

February 2026

# Women's Aid Submission to the Child and Family Homelessness Action Plan Public Consultation



Women's  Aid

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Women's Aid welcomes the opportunity to make a submission to the Department of Housing, Local Government and Heritage on the development of the Child and Family Homelessness Action Plan; given our remit we will focus on how homelessness impacts on women and children survivors of domestic violence and abuse (DVA)<sup>1</sup>.

### **Need for specific domestic abuse strand**

Domestic violence and abuse is a huge, ongoing problem in Ireland, with 35% of women having experienced psychological, physical and/or sexual abuse from an intimate partner<sup>2</sup>.

DVA is recognised as a key driver of women and children's homelessness in Ireland and internationally<sup>3</sup>. Conversely, being homeless increases the risk of gender-based violence, including sexual violence, harassment and exploitation.

When a survivor (often with children) flees the family home, finding emergency accommodation and re-establishing long-term secure housing are two of the most urgent yet difficult issues she faces. Currently victims of DVA encounter huge issues in securing accommodation both emergency and long-term.

In terms of emergency accommodation, refuges are overstretched and cannot meet demand. This is in part due to the difficulties survivors face in moving on, with families remaining in refuge longer than needed, or at times returning to the perpetrator due to the lack of options.

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<sup>1</sup> More information on Women's Aid is available at [www.womensaid.ie](http://www.womensaid.ie)

<sup>2</sup> FRA, EIGE, Eurostat (2024), EU gender-based violence survey – Key results. Experiences of women in the EU-27, Publications Office of the European Union, Luxembourg.

<sup>3</sup> Mayock P. and Neary F, 2021, Domestic Violence & Family Homelessness, Focus Ireland; [https://www.focusireland.ie/wp-content/uploads/2021/12/Domestic-Violence-and-Family-Homelessness-Report\\_FINAL.pdf](https://www.focusireland.ie/wp-content/uploads/2021/12/Domestic-Violence-and-Family-Homelessness-Report_FINAL.pdf)

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The 2021 Focus Ireland research shows that the path from leaving to secure housing is long, complex and all but straightforward, with families having to move in and out of unstable accommodation multiple times<sup>4</sup>.

Prior to becoming homeless a DVA survivor has lived with abuse and violence for years, which impacts on the resources she needs to exit homelessness, such as employment and finances, physical and mental health, the ability to call on family and social networks.

Yet so far Housing and Homelessness strategies have not considered DVA survivors as a group with specific experiences and needs, especially in relation to safety. Linkages with the National DSGBV Strategies have been insufficient.

There is also a lack of data regarding DVA and homelessness: women and children in DVA refuges are not counted as homeless, while DVA survivors in homelessness services are not systematically identified as such, because the PASS system does not have a DVA category.

### **Recommendations**

- 1.1 The Homelessness Action Plan should include a specific strand looking at the experiences and needs of women and children who are homeless due to domestic abuse with targeted actions in the immediate and longer term.
- 1.2 The Action Plan should link with the National Strategy on Domestic Sexual and Gender Based Violence to ensure the fast delivery of refuge accommodation remains a priority and jointly address DVA-related homelessness.
- 1.3 Domestic Violence services should be included in any consultation and implementation of the Action Plan, at local and national level.
- 1.4 Women and children staying in Domestic Violence services, or otherwise out of home due to domestic abuse, should be included in homelessness data.

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<sup>4</sup> Mayock P. and Neary F, 2021 page 55

1.5 The PASS systems should be modified to include DVA as a cause of homelessness category.

### **Homelessness prevention**

The best form of homelessness prevention for women and children escaping DVA is to remain in the family home and remove the perpetrator, **but only if they wish and are safe to do so**. This option is not for all families, but when viable it keeps survivors in their community and prevents the huge disruption, especially for children, that occurs when they are the ones who have to move.

Therefore, the Homelessness Plan should include measures to support DVA survivors and their children remaining **safely** in the home. This means addressing safety, financial and tenure concerns. In terms of safety, survivors should be supported in getting barring orders and making the home more secure. In this respect we note that in 2024 the Women's Aid Emergency Fund spent over €61,000 for security measures for women accessing our and other DVA services<sup>5</sup>. This finite support, paid for by fundraising, is no substitute for an ongoing, fully funded national programme.

Other jurisdictions have formal multi-agency programmes to support DVA survivors remaining in the home safely. The Australian Staying Home, Leaving Violence Programme<sup>6</sup> and the UK Sanctuary Scheme<sup>7</sup> provide examples of programmes where agencies work together to make it safer for women and children to remain in the family home by removing the perpetrator and providing a range of services (safety planning, improving home security, assistance with legal issues and managing finances) and tailored supports for any issues that may hinder their ability to maintain housing (such as mental health, disability, substance abuse, immigration status).

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5 Women's Aid Impact Report 2024

6 <https://dcj.nsw.gov.au/service-providers/supporting-family-domestic-sexual-violence-services/dfv-programs-funding/staying-home-leaving-violence.html>

7 <https://www.gov.uk/government/publications/sanctuary-schemes-for-households-at-risk-of-domestic-violence-guide-for-agencies>

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Women remaining in the home may also need financial support with rent or mortgage payments, as they may have difficulties in continuing to pay them with a much-reduced household income, particularly in the first few months after separation which is usually a time of great financial stress. Providing financial assistance at this time may make the difference between someone remaining in the home or becoming homeless.

There may also be a need for support in renegotiating leases and mortgages.

Note that remaining in the home may not be possible or desirable in all cases, survivors need to have the **option** to relocate to a new home and should be assisted to do so if that is their preference. In this case the same measures to increase the safety of the home and ensure its financial viability need to be applied to the new housing, as well as any relevant supports, to minimise the period of homelessness or housing instability.

### **Recommendations**

The Homelessness Action Plan should:

- 2.1 Consider the feasibility of establishing a sanctuary scheme in Ireland.
- 2.2 In the meantime provide DVA survivors with free access to home security measures.
- 2.3 Create a range of financial and other supports to facilitate maintaining/accessing housing (emergency DV rent supplement/mortgage assistance, legal and financial advice).

### **Accelerate exits and reduce time in homeless accommodation**

Women and children entering refuges or other emergency accommodation find it very difficult to move on.

The housing crisis makes securing new accommodation in the private market (both buying and renting) nearly impossible for women who have suffered economic abuse, have little access to

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savings, or the family estate and may have negative credit or rental history due to the abuser's actions.

Both the HAP payment rate and the HAP limit are too low. There is no clarity on whether a survivor already renting in the private market would be able to terminate a lease for safety reasons without penalties, or to transfer from joint to sole tenancy, leaving this to the discretion of the owner/agency.

### **Recommendations**

3. 1 Increase the maximum rent limit on HAP properties to reflect market rents.
3. 2 Increase HAP rates to an adequate level.
- 3.3 Ensure victims of DVA cannot be penalised if they need to break a lease for safety reasons.

There are huge waiting lists for local/social housing, and administrative barriers prevent DVA survivors from accessing it or being prioritised. These barriers include:

- Domestic abuse is not included in the factors assessing a person as homeless under the Housing Act 1988. Therefore, some local authorities do not consider women who have left their homes because of domestic abuse and are staying with friends/relatives as "homeless" and deem them ineligible for priority
- Some local authorities require applicants to have lived in the area for a specified time or have local connections to be eligible for housing. This is problematic for families needing to relocate to a new area away from the abuser.
- Some local authorities do not consider a woman entitled to social housing if she jointly owns a property with her abuser, regardless of the fact that she is not able to live there due to safety concerns.
- There is no clear guidance on how to transfer local authority tenancies from joint tenancy with the perpetrator to a sole one in case of DVA.

- While Department of Housing Guidance states that housing authorities have **discretion** in allowing applications or establishing priority for victims of DVA, it does not place a **positive obligation** on housing authorities to disregard the above rules where there is domestic violence. This results in an inconsistent approach which must be overcome.
- A survivor on a local authority housing list who needs to move to another local authority for safety has to start a fresh application and loses the time they have built up. While there have been suggestions of a “social housing passport”, there is no clarity on its progress.

A recent UK report found that while the Domestic Abuse Act 2021 establishes clear housing rights for survivors, implementation by local authorities is inconsistent. They note that move-on outcomes improved when there was a good relationship with the local DVA service, when the DVA service provided training to the local authority and where the local authority had an internal specialist domestic violence worker<sup>8</sup>.

### Recommendations

- 4.1 Increase social housing and allocate a % of it to DVA victims.
- 4.2 Prioritise victims of DVA in local authority allocations.
- 4.3 Revise the Department of Housing Guidance to: extend the definition of homeless person to people out of home due to DVA; disregard the local connection and the joint property rule for these applicants; clarify the process to transfer to sole tenancy.
- 4.4 Progress the social housing passport.
- 4.5 Ensure relevant local authority staff are trained on DVA by a specialist DV service.
- 4.6 Ensure all Regional Statutory Homeless Action Plans are DVA informed and include responses to preventing and responding to homelessness caused by DVA.

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<sup>8</sup> Women's Aid. (2025). From Safety to Stability: Access to move-on accommodation after refuge. Bristol: Women's Aid.

<https://womensaid.org.uk/wp-content/uploads/2025/06/Safety-to-Stability-Access-to-move-on-accommodation-after-refuge.pdf>

4.7 Ensure DVA providers are represented in all Regional Consultative Groups. This might be achieved in collaboration with CUAN to ensure clear connections between implementation of Housing and Homeless policy and the National DSGBV Strategy.

### **Supports in emergency accommodation**

Many DVA survivors access generic homelessness services, often with children. All the homeless services in the Focus Ireland research confirmed that domestic violence is a constant feature of their work<sup>9</sup>. It is important that staff in these services can identify DVA and are trained in how to respond and refer to specialist services.

Children who are forced to leave the family home because of DVA must deal with both the consequences of past abuse and often with the ongoing abuse of themselves and/or their mother after separation. They should be provided with specialist support, both in DVA refuges and in generalist homelessness services, where they may also be accommodated.

Disabled women are more likely to experience intimate partner abuse than non-disabled women and face more barriers leaving, including the lack of **accessible** emergency refuges and long-term housing<sup>10</sup>. Many adult victim-survivors are also caring for children with disabilities. Our research evidenced the need for training for local housing authorities, social housing and refuges on the intersection of disability and domestic abuse.

### **Recommendations**

The Homelessness Plan should include:

- 5.1 Specialist training in DVA and coercive control for homeless services.
- 5.2 Improved linkages between DVA and Homelessness services.
- 5.3 Funding for Child Support Workers in all DVA and Homelessness services.

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9 Mayock P. and Neary F, 2021 page 73

10 Flynn, S., Lakkshme Sundaresan, S., Holt, S., Price, A. & O'Neill, G. (2024) Disabled women's experiences of intimate partner abuse in Ireland: Research project report. Ireland: Women's Aid. Page 18

5.4 Funding to ensure refuges and transitional housing services are accessible to disabled women and children.

5.5 Accessible housing options for disabled women and children fleeing domestic violence.

5.6 Disabled people-led training for refuges, local housing authorities and social housing providers, on the intersection of disability and domestic abuse and needs arising thereof.