



Homeless Action Scotland

Equally Safe Delivery Plan
response

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Response to a Consultation on the draft Delivery Plan for Equally Safe: Scotland's strategy for preventing and eradicating violence against women and girls.

Introduction

Homeless Action Scotland is the membership body for organisations and individuals in Scotland working to prevent and tackle homelessness. Our members include local authorities, housing associations, voluntary organisations and individuals.

Homeless Action Scotland welcomes the opportunity to respond to this Consultation and strongly supports the broad aims and principles of Equally Safe. We have restricted our comments to our specialist areas of knowledge. Our consultation response is below:

PRIORITY 1: Scottish society embraces equality and mutual respect, and rejects all forms of violence against women and girls

- 1. Do you agree or disagree that the actions listed under priority 1 are the right actions to help meet the objectives of priority 1?**

Agree

- 2. Please tell us about any of the priority 1 actions that you are particularly supportive of.**

N/A

- 3. Please tell us about any priority 1 actions that you don't agree with.**

N/A

- 4. Are there any actions that you think are missing under priority 1?**

Yes. It is vital that programmes aimed at increasing understanding of positive and healthy relationships and empowering people to challenge abusive or toxic attitudes and behaviours are not simply restricted to boys and men. Girls and young women should also have access to programmes which promote positive and healthy relationship models and should be empowered to challenge problematic attitudes and behaviours. This should include information about the law around consent and sexual violence as well as looking at domestic abuse.

Do you have any suggestions for additional actions to focus on?

The Scottish Government should support evidence based programmes from the third sector, such as the Rape Crisis Scotland Prevention Project, alongside MVP.

PRIORITY 2: Women and girls thrive as equal citizens: socially, culturally, economically and politically

5. Do you agree or disagree that the actions listed under priority 2 are the right actions to help meet the objectives of priority 2?

Neither agree nor disagree

6. Please tell us about any of the priority 2 actions that you are particularly supportive of.

Homeless Action Scotland is particularly supportive of the commitment to provide gendered services under the new devolved employability powers. This is an excellent opportunity to mainstream women's economic equality in a new government service.

We are also particularly supportive of the proposal to deliver split payments of Universal Credit. We would urge the Scottish Government to ensure that the delivery system is responsive and able to adapt quickly to changes in circumstances to ensure that there are no additional financial barriers to leaving an abusive partner or situation.¹

7. Please tell us about any priority 2 actions that you don't agree with.

N/A

8. Are there any actions that you think are missing under priority 2?

Yes, we are broadly concerned that the only workstream contributing to priority 2 is the primary prevention strand and, more particularly, are worried about the complete lack of focus on housing and homelessness in this section. While we welcome the inclusion of two homelessness related outcomes under priority 3, we strongly believe that women and girls can only thrive as equal citizens when their right to housing is secured. We believe this section would be strengthened by including the right to safe, accessible housing as explained below.

Homelessness and Violence against Women and Girls

The right to a sustainable and affordable home underpins the ability of women and girls to thrive in their communities and lives. Homelessness is an extreme violation of the right to adequate housing and can prevent women and girls from achieving social, cultural, political and/or economic equality.² Homelessness often considered a visibly male problem yet 45% of homelessness applications in 2016/17 were made by women and 12% of all applications were due to violent domestic disputes, an inherently gendered phenomenon.³ As we know that

¹ Homeless Action Scotland fully supports the arguments laid out in the 2016 Engender briefing, 'Gender Matters in Social Security: Individual Payments of Universal Credit'. (Accessed [here](#), 4th July 2017).

² For an in-depth analysis of homelessness as a violation of the right to adequate housing, see the 2015 Report of the Special Rapporteur on adequate housing. (Accessed [here](#), 4th July 2017).

³ All figures drawn from the Scottish Government Publication, 'Homelessness in Scotland: 2016-17'. (Accessed [here](#), 4th July 2017).

official figures on domestic abuse are often underreported⁴, it is likely that this figure does not show the full picture.

Violence against women and girls can be both a cause and a consequence of homelessness. The best understood connection between homelessness and violence against women is domestic abuse. As stated above, approximately 1 in every 8 homelessness applications in Scotland is due to domestic abuse incidents.⁵ However, domestic abuse is not the only form of violence against women that can lead to homelessness. Other women and girls experience homelessness as a result of fleeing non domestic sexual violence, abuse and exploitation. Once homeless, women and girls are often vulnerable to further physical and sexual violence and there are links between homelessness and forms of sexual abuse, coercion and exploitation. In a recent report from St Mungo's focusing on the women in their services, they found:

- Almost half their female clients had experienced domestic abuse and a third said domestic abuse had contributed to their homelessness
- 19% had experienced abuse as a child
- More than a third of their clients who had slept rough had been involved in prostitution.⁶

These statistics highlight that not only can violence against women and girls cause homelessness in crisis situations but that many women and girls experiencing homelessness have experienced disproportionate levels of gendered violence, abuse and exploitation in their lives.

We would strongly support the inclusion of outcomes relating to housing and homelessness to recognise these links and to ensure that women and girls thrive in their communities and in Scottish society.

Understanding Gender

Homeless Action Scotland is concerned that the outcomes under this area are primarily led by and for the Scottish Government. It is vital that COSLA and local authorities are engaged with gendered budgeting, policy making and equality impact assessments in order to ensure local and regional services are taking gender differences into account when making decisions and providing services. We would urge their involvement at any early stage.

Contributing Workstreams

As we have suggested explicitly including housing and homelessness in this priority and involving COSLA and local authorities at an earlier stage, we believe it would be appropriate to involve the Capability and Capacity workstream in this priority. This is particularly important given the focus on gendering policy and budgeting processes in public services.

Do you have any suggestions for additional actions to focus on?

Yes, based on the above concerns Homeless Action Scotland suggests:

⁴ *Scottish Crime and Justice Survey 2014/15: Partner Abuse*, Section 4, 'Reporting Partner Abuse'. (Accessed [here](#), 4th July 2017)

⁵ See footnote 3, above.

⁶ All figures from '*Rebuilding Shattered Lives: The Final Report*', St Mungo's. (Accessed [here](#), 4th July, 2017)

- Involving the Capability and Capacity workstream in this priority area
- Finding ways to engage COSLA and local authorities in the Understanding Gender outcomes
- Include new actions to ensure that the housing situation of women and girls does not negatively impact their ability to thrive economically, socially, culturally and politically. This might include outcomes around financial barriers to working while in temporary accommodation or refuge and ensuring that the education of children is prioritised in homelessness situations.

PRIORITY 3: Interventions are early and effective, preventing violence and maximising the safety and wellbeing of women, children and young people

9. Do you agree or disagree that the actions listed under priority 3 are the right actions to help meet the objectives of priority 3?

Neither agree nor disagree

10. Please tell us about any of the priority 3 actions that you are particularly supportive of.

We welcome the inclusion of specific outcomes relating to local authority housing and homelessness hubs ('Housing Options Hubs') and supported accommodation projects, including refuge. However, we do believe that these outcomes could be more ambitious than they currently are.

11. Please tell us about any priority 3 actions that you don't agree with.

N/A

12. Are there any actions that you think are missing under priority 3?

Yes. While we welcome the broad focus of this priority area, we believe that the Scottish Government should take this opportunity to be as ambitious as possible. There are several outcomes which could be expanded in small and realistic ways which could create a much greater impact.

Housing Options Hubs

Homeless Action Scotland are completely supportive of the inclusion of training for Housing Options Hubs. As stated previously, approximately 1 in 8 homelessness applications are due to violent domestic dispute so there is a real need for training in domestic abuse competence. We would suggest however, that this outcome could be improved by ensuring that commissioned training has a broader focus on gender and violence against women. This would allow for domestic abuse competence to be developed but it would also equip housing options and homelessness teams to deal with cases of violence against women and girls that are linked to homelessness such as sexual abuse, commercial sexual exploitation and forced marriage.

We would also suggest that this training will be more effective where COSLA and local authorities more broadly are engaged in these issues as suggested in priority area 2.

Funding Supported Housing

We strongly welcome the commitment to develop appropriate funding options for supported housing providers, including domestic abuse refuge providers. We have two areas to highlight within this outcome:

- Refuge provision is an essential service provision in tackling domestic abuse and Homeless Action Scotland is completely supportive of ensuring sustainable and appropriate levels of funding for such provision. However, we would note that refuges are not an appropriate form of accommodation for all women leaving abusive partners. This can be for a variety of reasons including refuge availability, location and cost or multiple and complex needs including substance abuse and mental health conditions that are better served in specialist services for these issues. We would support the development of funding options that enable all women who have experienced abuse and violence to access appropriate and safe supported accommodation (when appropriate) that is tailored to their needs. Refuge provision, although vital, is only one part of this picture.
- In addition to specialist forms of supported accommodation, we know that many generic homelessness services also see women and girls who have experienced gender based violence including childhood sexual abuse, commercial sexual exploitation, trafficking and sexual violence, as well as domestic abuse. The development of funding options must also take these services into account to ensure that they are trained and equipped to accommodate women and girls who have experienced trauma, exploitation and abuse even where specialist services are providing outreach support.

Do you have any suggestions for additional actions to focus on?

Homeless Action Scotland would therefore suggest that:

- Commissioned training resources for local authority Housing Options Hubs include a broader focus on all forms of gender based violence in addition to domestic abuse
- During the process of developing funding options for supported housing there is a focus on supported accommodation which is equipped to accommodate survivors of all forms of violence against women and girls and that funding to support generic homelessness services in developing gender sensitive services that take into account violence against women is considered.
- The above outcomes will be more effective and have greater impact where COSLA, local authorities and the broader third sector is involved. We would particularly support the inclusion of the homelessness sector in the delivery of these outcomes.

PRIORITY 4: Men desist from all forms of violence against women and girls and perpetrators of such violence receive a robust and effective response

13. Do you agree or disagree that the actions listed under priority 4 are the right actions to help meet the objectives of priority 4?

Neither agree nor disagree

14. Please tell us about any of the priority 4 actions that you are particularly supportive of.

N/A

15. Please tell us about any priority 4 actions that you don't agree with.

While we are supportive of the outcome related to encouraging victims of gender based violence to report their experiences we are concerned that the action attached is limited to the domestic abuse communications plan. While this is important, it is not enough by itself. We know that other forms of violence against women and girls, such as rape and sexual assault, are underreported. We also know that certain groups of women and girls, such as those involved in prostitution, are reluctant to approach the police due to bad experiences. Any serious attempt to increase reporting must go far beyond the domestic abuse communications plan and must involve Police Scotland ensuring they are seen as approachable and non-judgemental.

16. Are there any actions that you think are missing under priority 4?

Yes. We are again concerned at the complete lack of focus on housing and homelessness in this section on perpetrators. We would suggest that clear guidance and information on housing rights and options in situations of domestic abuse and non-domestic violence is published considering the housing rights of survivors and perpetrators, the options available in these situations and the responsibilities and duties of local authorities. The lack of guidance available and the conflicting information provided by local authorities in cases of domestic and/or sexual abuse was highlighted in the Scottish Women's Aid 'Change, Justice, Fairness' report.

We are also concerned about the absence of the Scottish Prison Service in this priority area.

Do you have any suggestions for additional actions to focus on?

We would suggest the drafting of clear guidance and information on housing rights and options in situations of domestic abuse and non-domestic violence. This should consider the housing rights of survivors and perpetrators, the options available in these situations and the responsibilities and duties of local authorities. It should be easily accessible and understandable for the general public.

Cross cutting actions

17. Do you agree or disagree that the actions listed as cross cutting are the right actions to help meet the overall objectives of the delivery plan?

Agree

18. Please tell us about any of the cross cutting actions that you are particularly supportive of.

We strongly welcome the integration of human rights and violence against women and the use of the Sustainable Development Goals.

19. Please tell us about any cross cutting actions that you don't agree with.

N/A

20. Are there any cross cutting actions that you think are missing?

N/A

Do you have any suggestions for additional actions to focus on?

We welcome the mapping of exit routes from commercial sexual exploitation. We would urge the Scottish Government to take housing needs into account as part of this process.

Performance Framework and Indicators

21. Do you agree or disagree that the draft performance framework is right to help ensure that we understand the progress we are making?

Disagree

22. Please tell us about any sections of the draft performance framework that you are supportive of

N/A

23. Is there anything you think is missing?

N/A

24. Do you have any suggestions for additions to the draft performance framework?

The target groups in the framework seem to focus solely on the long term outcomes. We would suggest that they should include the services, organisations and institutions that will lead on the short and medium term outcomes. We need to see changes in these services in order to ensure that the long term outcomes are met. For example, in order to meet the short term outcome 'perpetrators are identified (early)' the target group must be the services and organisations that are responsible for identification rather than the perpetrators themselves. This would improve the framework and allow key stakeholders to see their role and place in the long term structure.

We would also suggest the following additional indicator:

% of local authority Housing Options Hubs trained in gender based violence/gendered approaches to homelessness prevention

Questions for Groups & Organisations

25. What role could your organisation have in contributing to this delivery plan?

As the national membership body for organisations working in homelessness in Scotland, we are able and willing to provide a national homelessness perspective drawn from the experience and expertise of our members. We would be very happy to work with the Scottish Government to strengthen the element of this plan which touch on housing and homelessness. We currently provide training courses on housing rights when relationships break down which specifically look at housing rights for abused women and many of our members offer training on other areas of violence against women and girls and housing/homelessness.

We will continue to work to find way to improve links and practice in the intersection of violence against women and girls and homelessness and welcome any opportunity to take this forward through Equally Safe.

26. In responding to this consultation, how are you drawing on the experiences and views of the women, children and young people who access your organisation?

As a membership body, we do not provide any frontline services. Our response is drawn from the frontline experience of our members which includes specialist violence against women services, third sector homelessness organisations, local authorities and housing associations. We have also drawn on evidence based best practice from national and international sources.

Homeless Action Scotland gives full permission for this submission to be published.

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