



Ministry of Housing,  
Communities &  
Local Government

## Domestic Abuse Services

### Future Delivery of Support to Victims and their Children in Accommodation-Based Domestic Abuse Services: Consultation Response



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# 1. Ministerial Foreword

Crime, whatever form it takes, has serious and potentially devastating consequences for the victims. But domestic abuse is an especially vile form of life-threatening abuse, which leaves victims including children living in fear in the place where they should feel most safe – their own homes.

That is why this Government is committed to ensuring that all victims of domestic abuse receive the support they need, as soon as they need it.

I am determined to ensure that no victim should have to struggle to get the right support or wait months for help. This includes having a safe place to stay with specialist support to rebuild their lives, with these vital services available across the country.

It was with this in mind that my department consulted on proposals to improve the way support within safe accommodation is commissioned and delivered.

I would like to thank everyone who took the time to respond to the consultation, providing valuable advice and insight into the steps required. In particular, I want to pay tribute to the dedication of front line service providers, national organisations and local authorities in supporting survivors and victims of domestic abuse.

It is encouraging to see that so many of you supported the overall aims of the proposals to introduce stronger accountability and consistency in the way that support within safe accommodation is delivered. This response sets out how a new statutory duty will support local authorities to do this.

To that end, the Government will develop statutory guidance, clearly outlining the expectations we have of local authorities to deliver a safe place to live with the right support for all who need it.

It is essential that local authorities work closely with partners locally, including specialist service providers and national organisations to assess needs and ensure that the support is tailored to meet these requirements.

I recognise that individual circumstances and needs can vary significantly from place to place. This is why specialist domestic abuse support must be available within a broad range of safe accommodation so victims and survivors can make their own choices about what is best for them.

Alongside these new proposals, Government will also establish a ministerial-led National Steering Group to monitor and evaluate delivery of the new duty, and my department will work closely with the Domestic Abuse Commissioner, to ensure we are making a real difference for those who have suffered so terribly. We must provide the right support, so they can recover and rebuild their lives.

I am confident that the measures in this response will help victims of domestic abuse to secure the accommodation and support they deserve as they look towards a brighter future.

**Rt Hon Robert Jenrick**  
**Secretary of State for Housing, Communities and Local Government**

## 2. Introduction

In March 2016 the Government published The Violence Against Women and Girls (VAWG) Strategy,<sup>1</sup> later updating it with the publication of the VAWG Strategy refresh on 6 March 2019.<sup>2</sup> The Strategy makes clear commitments to ensure no woman is turned away from the support she needs and that all victims get the right support at the right time.

As the lead for Government on housing the Ministry of Housing, Communities and Local Government (MHCLG) has a critical role to play in the provision of refuge and safe accommodation with support for survivors and victims of domestic abuse. As set out in the 2016 VAWG Strategy, in 2018 MHCLG reviewed the existing locally-led approach to commissioning of domestic abuse safe accommodation services across England.

We know how important high-quality support is essential to helping survivors and victims recover from the trauma of abuse and move on with their lives. Research and engagement have shown the importance of having support accessible within a range of safe accommodation services to ensure victims have a safe and secure place to live. We also understand that stable funding and effective commissioning of support within safe accommodation is a vital accompaniment to successful delivery of these services.

During the review we heard that commissioners and service providers would value stronger requirements and clearer expectations on how the need for this support is assessed and met. In particular, we found that more is needed to ensure all victims, the definition of which according to the Code of Practice for Victims of Crime includes their children, can access support within safe accommodation services. This includes Black, Asian and Minority Ethnic (BAME); Lesbian, Gay, Bisexual and Transgender (LGBT), disabled, male, young (aged 16-18) and older victims, offenders, people of faith who are victims of domestic abuse, victims with more than one child, those moving local areas to remain safe, those presenting with complex needs (including mental health and/or substance misuse needs), those with insecure immigration status or from isolated and/or marginalised communities, as well as their children (including adolescent male children).

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<sup>1</sup> <https://www.gov.uk/government/publications/strategy-to-end-violence-against-women-and-girls-2016-to-2020>

<sup>2</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/783596/VAWG\\_Strategy\\_Refresh\\_Web\\_Accessible.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/783596/VAWG_Strategy_Refresh_Web_Accessible.pdf)

As a result, the consultation sought views on the following areas:

- Defining accommodation-based services and support
- Leadership and responsibilities
- Local and national accountability
- Guidance
- Supporting all victims of domestic abuse

Recognising that local government plays an important leadership role in delivering domestic abuse services, we proposed placing a new statutory duty on Tier One local authorities (in this instance, County Councils, Metropolitan and Unitary Authorities and the Greater London Authority) to convene a Local Domestic Abuse Partnership Board ('the Board') comprised of a wide range of specialist local partners.

We proposed that the Board would be required to assess need for support within safe accommodation, develop and publish local strategies, decide what support services are required and commission these accordingly and report progress back to MHCLG. Within the proposal Tier Two authorities (in this instance, District, City and Borough Councils) would also be subject to a statutory duty to co-operate with the Board. To help local authorities and Boards meet these new requirements and transform the provision of support to victims of this devastating crime, we proposed that Government should produce statutory guidance to clearly set out expectations on local authorities in meeting their duty.

This response focuses on support within safe accommodation and does not address wider community services accessed by victims of domestic abuse. MHCLG are continuing to work with other government departments to explore the cross-government approach to community based domestic abuse services.

## 3. Executive Summary

On 13 May MHCLG launched a 12-week consultation on Future Delivery of Support to Victims and their Children in Accommodation-Based Domestic Abuse Services, which closed on 2 August.

The proposals set out in the consultation aimed to address the inconsistent approach to the commissioning and delivery of support within safe accommodation. Through these proposals, we want to ensure that all victims of domestic abuse can access the right support within safe accommodation when they need it.

The consultation focused specifically on the support within safe accommodation services, because in the majority of cases the costs of rent and eligible service charges will be met through welfare benefits

### 3.1. Methodology

Through this consultation, we wanted to hear from victims and survivors, service providers, local authorities and other public agencies, as well as other professionals who support victims and their children every day. To ensure that all were able to respond to the proposals within the consultation we used an online platform that would enable accessibility for all.

As we wanted to hear the views of individuals, and in particular the views of survivors of domestic abuse, we were conscious to preserve the anonymity of individuals. To support this need and to assist with gathering demographical and geographical data we only asked for respondents to identify themselves by two questions:

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#### Are you answering the consultation as?

- a. An individual with personal interest, b. An individual as a member of an organisation, c. An Upper Tier Local Authority, d. A Lower Tier Local Authority, e. Other

#### From the list below, where are you or your organisation based?

- a. London, b. South East, c. North West, d. East of England, e. West Midlands, f. South West, g. Yorkshire and the Humber, h. East Midlands, i. North East, j. National

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All responses to the consultation have been carefully considered and are reflected in the Government's response. The most common themes raised by respondents have been reflected in the summary data and statistics set out section by section below.

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There were also a small number of responses which were received via the dedicated mailbox but did not follow the questions or sections set out as in the consultation document or online questionnaire, and as a result could not be attributed to specific questions. These responses are therefore not reflected in the summary data, however they have all been considered as part of the response.

Unless stated otherwise, the figures set out in this document represent the number of responses received for each of the questions, and not the number of responses received to the consultation overall.

## 3.2. Engagement

The consultation received over 400 responses. Prior to and during the consultation period, policy officials met key stakeholders and attended events across the country to discuss the proposals set out with local authorities, sector organisations, service providers and survivors. We want to extend our thanks to all those who shared their views and experiences throughout the consultation process and to all the organisations that hosted events.

Type of respondent	No. of respondents
An individual with personal interest	78 (18.9%)
An individual on behalf of an organisation	199 (48.2%)
An Upper Tier Local Authority (Tier One)	68 (16.5%)
A Lower Tier Local Authority (Tier Two)	56 (13.6%)
Other	12 (2.9%)
Not Identified	19 (4.6%)

Region	No. of respondents
London	68 (16.6%)
South East	68 (16.6%)
North West	42 (10.2%)
East of England	24 (5.9%)
West Midlands	45 (11.0%)
South West	54 (13.2%)
Yorkshire and Humber	25 (6.1%)
East Midlands	29 (7.1%)
North East	24 (5.9%)
National	31 (7.6%)
Not Identified	22 (5.3%)

### 3.3. Main findings

The majority of those who responded to the consultation agreed with the proposals set out. The responses also provided vital insight into the differing approaches and experiences on the ground, including examples of current partnerships and joined up working to support domestic abuse survivors in safe accommodation.

#### Statutory Duty

There was strong agreement to the proposal to introduce a statutory duty on local authorities for the delivery of support within domestic abuse safe accommodation services. Government will therefore introduce a statutory duty based on the proposal set out in the consultation, including a requirement on Tier One authorities to convene a Domestic Abuse Local Partnership Board to advise on conducting robust local needs assessments and developing strategies to support victims and their children within safe accommodation.

There were, however, some concerns in regard to the scope of the proposals only covering support within safe accommodation. Some responses called for the duty to be widened in order to cover all types of domestic abuse support.

Whilst we recognise the importance of both support within safe accommodation and community-based domestic abuse services being available to victims and survivors, we have been clear that the scope of this consultation and statutory duty is in relation to support within safe accommodation.

Government is committed to tackling domestic abuse and supporting all victims and survivors of this devastating crime, which is evident in Government's commitment to take forward the Domestic Abuse Bill.

Support within safe accommodation is one part of a wider approach to tackling domestic abuse and supporting survivors. This statutory duty will form part of the Domestic Abuse Bill and will contribute to the wider range of protection and support proposed under the Bill. MHCLG will also continue to work closely with other government departments to explore the approach to community based services.

#### Definitions

Overall a majority of respondents agreed with the proposed broad definition of accommodation-based services. However, concerns were highlighted in regard to some of the accommodation types listed. This is because respondents believe that they are not domestic abuse specialist accommodation services and as a result would not be appropriate for supporting victims and survivors of domestic abuse.

We would like to clarify that all of the service types listed under the definition must be dedicated domestic abuse safe accommodation and not provision that provides generic bed spaces (e.g. bed and breakfast accommodation). To support this, we will further clarify the definition to ensure it cannot be interpreted in such a way.

This includes changing the wording from 'accommodation-based services' to domestic abuse 'safe accommodation'. In addition, we have removed the wording 'temporary' and 'respite' from the definition, as well as clarified the types of 'emergency' safe accommodation services that can be considered under the definition. A full breakdown of the amended definition of safe accommodation can be found in section 4.1.

### **Needs Assessment**

The majority of respondents agreed with the proposal which would require Tier One authorities, advised by the Local Partnership Board, to undertake a local needs assessment on support provided within safe accommodation. However, there was little agreement on how frequent the assessments should be conducted. Around 25% of respondents indicated that an assessment should be undertaken on an annual basis and around 21% favoured every three years. A number of comments also suggested that the frequency be flexible in order to be able to incorporate any changes in local need and / or better link in with current local governance arrangements.

We have therefore taken the decision, based on the overall responses, to set the frequency of conducting a full local needs assessment to every three years, with the expectation that a review/ refresh takes place at a minimum, on an annual basis. For Government's full response on needs assessments, please see section 4.7.

### **National Oversight**

There were some responses to the consultation which highlighted that the information provided on the national oversight of the duty was limited and further detail was needed on how the ministerial-led National Steering Group would operate. There were also calls for setting out more clearly how reporting will work and how local authorities will be held accountable for the delivery of the duty.

We have therefore set out in greater detail the role of the National Steering Group (see section 4.10), including how it will review and evaluate delivery of the duty, as well as publishing an annual report on progress.

We made clear in the consultation that local authorities will be required to submit reports back to MHCLG, which will then be reviewed to help identify areas which may require further support at both a local and national level. The lead MHCLG minister will take appropriate action should an area face particularly challenges in fulfilling its duty.

## Funding

Throughout the consultation there was a call for adequate and dedicated funding to support the proposals set out. In response, many local authorities and domestic abuse service providers supplied detailed information to support the assessment of the cost of delivering the new statutory duty. We would like to thank all those who contributed to this important piece of work. Final decisions on funding will be made as part of the Spending Review in 2020, ahead of the new duty coming into force.

## 3.4. Next Steps

The consultation also sought views on the proposed approach to developing statutory guidance for local authorities. This will now be finalised taking account of the responses to this consultation and will be published in due course.

In a small number of areas, we plan to conduct further informal consultation with stakeholders before we publish statutory guidance. This includes, for example, the standardised needs assessment form and reporting mechanism. To that end, we will be working closely with local authorities, service providers and representative organisations over the coming months to finalise these processes.

Many respondents to this consultation, particularly local authorities, asked for Government to provide or facilitate the sharing of good practice examples and case studies to support implementation. We will work closely with local authorities to determine how best to deliver this in a way that fully supports them in their delivery of the new statutory duty.

The duty will be included as part of the Government's Domestic Abuse Bill.

# 4. Consultation Outcomes

## 4.1. Accommodation-based services

Engagement with sector and local partners during the review and consultation period reinforced our understanding of the differing needs of victims and their children, and the importance of having a variety of different forms of safe accommodation available to them.

Within the consultation we proposed a broad definition of ‘accommodation-based services’. This would enable local authorities to meet the support needs of diverse groups of victims and their children in different accommodation settings. As well as taking account of the needs of those at lower and medium risk to prevent their needs from escalating.

Throughout the review and consultation, we defined ‘accommodation-based services’ as:

- Specialist refuge accommodation, including refuges which provide dedicated support to victims with protected characteristics and/or complex needs. These may include refuges for BAME, LGBT, and disabled victims and their children.
- Dispersed accommodation.
- Properties with Sanctuary Schemes or other enhanced security measures.
- Other forms of emergency accommodation – e.g. respite accommodation or temporary accommodation.
- Move-on and second stage accommodation.

### “We Asked...”

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Q1. Do you agree with our definition of ‘accommodation-based services’ for victims and their children?

Q2. Are there any other services, other than those listed, that you would define as an accommodation-based service?

If ‘Yes’, what is this accommodation-based service?

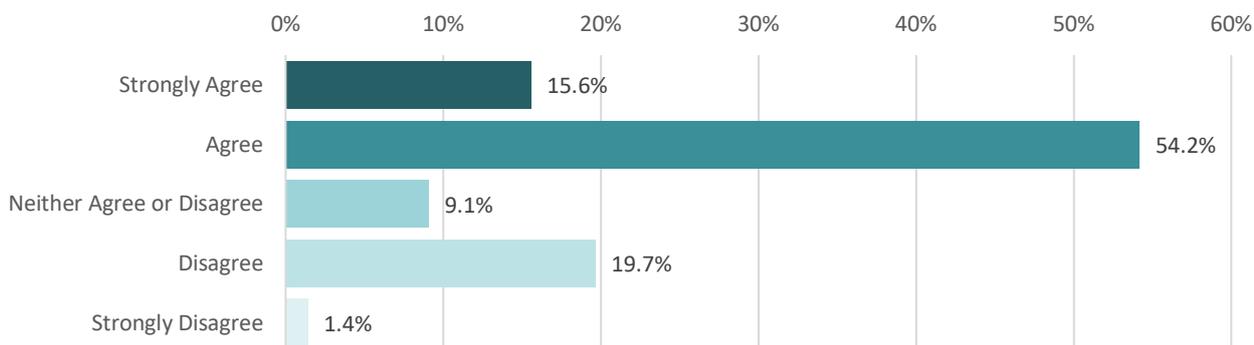
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### “You Said...”

The majority of respondents, 69.8%, either strongly agreed or agreed with the proposed definition of accommodation-based services. It was agreed that having a broad spectrum of specialist domestic abuse safe accommodation included under the definition will provide greater options for victims and survivors and allow local authorities to better meet their needs.

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Q1. Do you agree with our definition of 'accommodation-based services' for victims and their children?



Some respondents (13.9%) believed that the definition as drafted was too wide and should only be defined as specialist domestic abuse refuge.

*“...the proposed definition of accommodation-based services is too broad, with some proposed components too vague... As currently drafted, the definition of accommodation-based services could incentivise the commissioning of non-specialist, generic services, which are primarily accommodation services, rather than specialist domestic abuse support services.”*

*- An individual as a member of an organisation*

In contrast, 12% indicated that the types of services set out could potentially be too limiting and should be widened to also include domestic abuse services outside of safe accommodation.

*“The definition should be wider to take focus off victims / survivors having to move in order to seek safety and support.”*

*- An individual as a member of an organisation*

Concerns were raised throughout both formal and informal consultation in regard to the potential risk that services which did not specialise in providing dedicated domestic abuse services could be included under the definition, and there was a need to ensure that all safe accommodation types considered under this proposal are specialist domestic abuse services providing expert support and advice to victims and survivors of domestic abuse, and not generic accommodation services.

### **“We Will”**

We agree that the services commissioned as part of this duty should be specifically providing tailored support for victims and survivors of domestic abuse. Generic accommodation such as bed and breakfast is not considered as safe accommodation under this duty.

We will therefore change the wording to ‘domestic abuse safe accommodation’ (referred to as ‘safe accommodation’ in this document from this point onwards) to make clearer that the services falling under this definition are dedicated specialist services which provide a safe place to stay for survivors and victims fleeing domestic abuse. We will maintain the broad definition of safe accommodation in recognition of the diversity of housing in which victims may live, from refuges to dispersed accommodation.

We recognise that the understanding of some safe accommodation types proposed under the definition in the consultation may differ on the ground and we have therefore further clarified what we mean by the types of services set out. The different types of safe accommodation will be specified in regulations, supported by statutory guidance.

### **Domestic Abuse Safe Accommodation definition:**

- a. **Refuge accommodation** – a refuge offers accommodation and intensive support which is tied to that accommodation. Victims, including their children, have to be refuge residents to access specialist emotional and practical support.
- b. **Specialist safe accommodation** – safe accommodation services which provide dedicated specialist support to victims with protected characteristics and/or complex needs, such as specialist refuges for BAME, LGBT, and disabled victims and their children.
- c. **Dispersed accommodation:**
  - Safe, self-contained accommodation with the same level of specialist domestic abuse support as provided within a refuge but which may be more suitable for victims who are unable to stay in a refuge with communal spaces due to complex support needs or for families with teenage sons for example.
  - Safe, self-contained ‘semi-independent’ accommodation which is not within a refuge but with floating support for victims who do not require the intense support offered through refuge.
- d. **Sanctuary Schemes** – properties within Sanctuary Schemes or other similar schemes which provide enhanced security measures. A Sanctuary Scheme is a survivor centred initiative which aims to make it possible for survivors of domestic abuse to remain in their own homes, where it is safe for them to do so, where it is their choice, and where the perpetrator does not live in the accommodation. This is done by providing additional security – ‘installing a sanctuary’ – to the victims’ property or perimeter.

A number of local authorities run Sanctuary Schemes, working in partnership with the police to implement the scheme and any organisation working with an individual they deem suitable for sanctuary measures can make a referral to the scheme.

- e. **Move-on and / or second stage accommodation** – interchangeable terms for projects temporarily accommodating victims, including families who no longer need the intensive level of support provided in a refuge, but would still benefit from a lower level of domestic abuse specific support for a period before they move to fully independent and permanent accommodation. There is no expectation that every victim will require this. Many victims are ready to move straight to a permanent new home from refuge. However, move-on and / or second stage accommodation may be helpful in some cases.
- f. **Other forms of domestic abuse emergency accommodation** – i.e. a safe place with support. To give victims an opportunity to spend a temporary period of time to consider and make decisions in an environment which is self-contained and safe. This would include access to wrap around support and specialist support for victims with complex needs (including mental health needs and substance misuse).

## 4.2. Support

Within the consultation we proposed that support is the expert help provided to victims by the specialist staff in domestic abuse safe accommodation services. It was also clear that support is provided to victims in different manners in different types of safe accommodation. Support may be provided directly within safe accommodation such as refuges, or through outreach support in other forms of domestic abuse safe accommodation such as dispersed housing.

To best represent the breadth of support that local areas provide to victims throughout their journey to recovery, we proposed a broad definition of support within safe accommodation which included:

- Service managers
- Refuge staff
- Key workers, including those which provide dedicated support or counselling/therapy to victims with protected characteristics and/or complex needs
- Children’s support workers
- Outreach workers providing housing-related support in safe accommodation
- Advice services
- Translators and interpreters
- Counsellors and therapists (for both adults and children)

### “We Asked...”

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Q3. Do you agree with our definition of ‘support’?

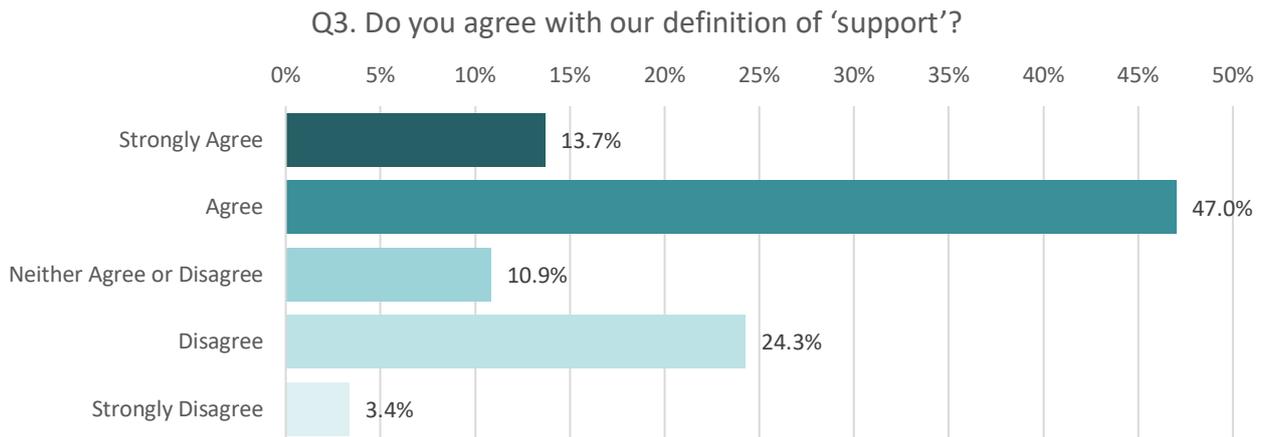
Q4. Do you define an accommodation-based service not listed here as support?  
If ‘Yes’, what is this support service?

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### “You Said...”

60.7% strongly agreed or agreed with the proposed definition of support. Many agreed with the need to keep the definition broad in order to consider the vast variety of support available to victims in safe accommodation. However, there was some concern that the support listed was too limited in scope. 15.2% commented that the definition of support should be widened to include community-based support services such as Independent Domestic Violence Advocate’s (IDVAs) and Multi-Agency Risk Assessment Conference’s (MARACs).

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A large number of comments indicated that the definition of support as drafted was unclear and needed to be more defined. This included a call for the definition to set out the types of support survivors are able to receive within safe accommodation under the duty, instead of setting out specific job roles.

### “We Will...”

In response to calls for the definition to be made clearer, we will amend the types of support listed so that it reflects the variety of support available instead of job types or roles, recognising that job titles can vary across the country and many may cover multiple support types.

We envisage that this will better support areas and providers to understand the scope of this duty whilst ensuring that vital support services within safe accommodation are not excluded due to variation in job roles within the sector.

The support to be covered under this duty will therefore be defined as:

- **Overall management of services** – management of staff, payroll and maintaining relationships with the local authority , financial management of service. (Often undertaken by a service manager).
- **Support with the day to day running of the service** – i.e. organisation of days e.g. times for counselling, group activities etc.
- **Advocacy support** – development of safety plans, liaison to other services (e.g. GPs and social workers, welfare benefits).
- **Domestic abuse support** – emotional support, support to assist victims to recognise the signs of abusive relationships, to help them remain safe (including online), and to prevent re-victimisation.

- **Specialist support for survivors with protected characteristics and / or complex needs.** e.g. translators and interpreters, faith services, mental health advice and support, drug and alcohol advice and support, and immigration advice.
- **Children’s support** – including play therapy and child advocacy.
- **Housing-related support** – providing housing-related advice and support e.g. securing a permanent home and advice on how to live safely and independently.
- **Counselling and therapy** for both adults and children.

We have not specifically set out IDVAs and MARACs (and other job roles) in the above list of support to allow local authorities flexibility to decide how best to provide advocacy and support services to victims in safe accommodation. We recognise that IDVAs and MARACs will continue to provide vital domestic abuse services in the community. However this does not fall within the scope of this duty.

## 4.3. A Statutory Duty

We proposed that there be a statutory duty framing the delivery of support to safeguard provision and provide clarity over governance and accountability. A duty would ensure the undertaking of needs assessment with the monitoring and reporting enhancing our understanding of safe accommodation services provision across England. We proposed a 4-part duty:

- I. **A duty on lead authorities to convene a multi-agency Local Domestic Abuse Partnership Board, which must perform certain specified functions, as outlined and explained in statutory guidance. These are to:**
  - a. Assess the need and demand for accommodation-based support for all victims, including those who require cross-border support.
  - b. Develop and publish strategies for the provision of support to cover the locality and diverse groups of victims.
  - c. Make commissioning / de-commissioning decisions.
  - d. Meet the support needs of victims.
  - e. Monitor and evaluate local delivery.
  - f. Report back to central government.
- II. **A duty for lead authorities to have regard to statutory guidance in exercising these functions;**
- III. **A duty on the Secretary of State to produce the statutory guidance; and**
- IV. **A duty on Tier 2 district, borough and city councils and London Boroughs to co-operate with the Local Domestic Abuse Partnership Boards.**

### “We Asked...”

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Q5. Do you agree with our approach of introducing a statutory duty underpinned by statutory guidance?

Q6. Do you agree with placing the statutory duty on Tier 1 Authorities (County Councils, Metropolitan Councils, Unitary Authorities and the Greater London Authority) as ‘Lead Authorities’?

Q7. Do you agree that a duty to co-operate should be placed on Tier2 Authorities and London Boroughs?

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### “You Said...”

The vast majority of replies were in favour of the proposals to introduce a statutory duty underpinned by statutory guidance with 86.3% either strongly agreeing or agreeing.

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*“We believe that the proposed statutory duty could help to end the postcode lottery that survivors currently face when trying to access support, improve accountability, and create more consistency in provision.”*

*- An individual as a member of an organisation*

*“...this will help to coordinate a systems-wide approach to commissioning and delivery of services.”*

*- A Tier One Local Authority*

Furthermore, 77.5% of respondents agreed to placing a statutory duty on Tier One local authorities as Lead Authorities, of Tier One local authorities that responded 90.5% were in agreement. 80.4% agreed that a duty to cooperate should be placed on Tier Two authorities – on this question 87.5% of Tier Two authorities agreed.

*“A statutory duty on Tier 1 Authorities aligns with their existing responsibilities on related matters for those affected by Domestic Abuse. They also have the understanding and expertise to map and respond to need in consultation with other key statutory bodies and stakeholders.”*

*- An individual as a member of an organisation*

Many responses conveyed agreement with the proposals, further elaborating how the scope of Tier One authorities meant they were best placed to lead on developing strategies which would effectively support victims. However, some respondents suggested a need for the duty on Tier Two authorities to go further than cooperate and to enable Tier Two authorities to commission services in order to ensure their unique knowledge and expertise of the services within the locality are fully utilised.

*“...we agree that Tier 1 Authorities are best placed to lead this work across their areas as they will be able to take a more strategic, co-ordination role, linking into other Tier 1 local authority responsibilities such as social care...”*

*- An individual as a member of an organisation*

Similar to views on the need to widen the definition set out to include services outside of safe accommodation, some comments in response to this suggested the need to widen the scope of this duty to cover all local domestic abuse services.

### **“We Will...”**

We will introduce a statutory duty based on the proposal set out in the consultation. This will form part of the Government’s Domestic Abuse Bill, the provisions of which will be subject to parliamentary scrutiny.

Government recognises the importance of all domestic abuse support services including those outside of safe accommodation. We are, and will continue to be, clear that the introduction of this duty should not result in any negative impact on non-accommodation based local domestic abuse services. We expect that support in safe accommodation should sit alongside and complement the support that is already available to victims.

We will not be extending this duty to include support outside of safe accommodation, instead maintaining the remit of this statutory duty to support within safe accommodation only. However, we will work closely with other government departments to continue to explore the cross-government approach to providing broader support to victims.

We agree with comments made in regard to Tier Two authorities and the level of local intelligence and expertise they can offer in developing needs assessments and strategies. Placing the overall duty on Tier One authorities sets out clearly where the accountability of the delivery of these services sit, something which we know has not being clear in the past. A duty on Tier Two authorities to cooperate ensures that their additional and more specific knowledge is fed into the area's approach.

Under this duty to cooperate, Tier Two authorities will need to provide data to Tier One Authorities to help, for example, inform needs assessments as well as contribute to the development of the local strategy and report on outcomes where they have commissioned services. The statutory guidance will make clear Government's expectation that Tier Two authorities play a key role in the delivery of this new duty.

In addition, it will be open to Tier One authorities to delegate commissioning decisions to Tier Two authorities by mutual agreement. This is set out in more detail in section 4.8 below.

## 4.4. The Local Partnership Board - Representation

A key finding from engagement throughout the review was of the benefit of multi-agency working in responding to the needs of victims of domestic abuse within safe accommodation. Research showed the value of close relationships between local authorities and a variety of agencies, most notably Police and Crime Commissioners and specialist domestic abuse services.

We made proposals for what a Board should look like, taking note that in those existing already they usually comprise of: local authorities or groups of local authorities, service providers, police, health and community representatives. The proposals set out expectations that the Board consist of key partners with an interest in tackling domestic abuse and supporting victims. Partners should reflect the range of skills, experience and expertise different organisations have in supporting victims and their children.

### “We Asked...”

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Q8. Do you agree with the proposed representation on Local Partnership Boards?

Q9. Do you believe your local authority has an existing governance structure in place which could meet the proposed role of the Board?

Q10. If you believe your local authority has an existing governance structure in place that could meet the proposed role of the Board:

- What is the structure of the Board?
- Who are the Board members?

Q11. Do you agree with a duty to convene a Local Partnership Board?

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### “You Said...”

The majority of respondents, 88.9%, agreed with the proposals for a duty to convene a Local Partnership Board, with 85.3% of local authorities, 89.3% of individuals and 91.1% of organisations agreeing. Comments in response to the proposal of convening a Board set out how it would enable a joint working approach to the provision of support for victims of domestic abuse.

*“This would appear the most efficient way of facilitating a joined-up approach, ensuring that all ‘key players’ are involved in decision making.”*  
- A Tier Two local authority

*“... we feel this would be a good way of combining resources and expertise to address domestic abuse in a joined-up way.”*  
- A Tier Two local authority

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*“I believe a multiagency/multidisciplinary approach is essential and a partnership board will provide this”  
- An individual with personal interest*

Of those that agreed with the representation of the Local Partnership Board 30.9% stressed the importance of representation amongst the board from specialist domestic abuse providers, with particular reference to services supporting survivors and victims from isolated and marginalised communities. It was also noted that many responses requested that the voice of the victim be heard within the Board.

Many local authorities, 64.2%, believed that there was a comparable governance board already in place within their area, such as: domestic abuse boards, sexual violence boards, VAWG specific partnerships or strategic boards, Community Safety Partnership Boards, and Health and Wellbeing boards.

It was clear from the responses that there is strong representation from both health services and police on established boards, when we asked who the board members were 53.1% indicated representation from health services and 52.4% identified representation from police amongst the boards.

Some responses highlighted the risk of duplication where established boards are already delivering many of the requirements set out, as well as the potential overlap with other boards which may have a similar interest.

#### **“We Will...”**

We will maintain the requirement on Tier One authorities to convene a Local Partnership Board as part of the statutory duty.

We will make clear in statutory guidance the flexibility local authorities have regarding utilising existing boards or structures which could cover the remit of the Board. We are clear that we do not want to cause duplication and know that some local authorities already have well established boards in place which will be able to perform the functions required.

As set out in the consultation, Government is content for local authorities to decide whether they use existing boards, expand or amend existing boards, or create a new dedicated Board in order to fulfil this duty. The selected approach must be able to meet all of the requirements set out under the duty and expectations set out in future statutory guidance.

The Board should include partners who are representative of different functions within its locality including health, police, housing, domestic abuse experts, public health, community safety and children’s services. The makeup of the Board may vary across local authority areas but should aim to include a broad range of representative partners.

We recognise the importance of ensuring local specialist domestic abuse service providers play a key role in local Boards. As set out in the consultation, Boards (whether existing or new) will need to have adequate representation from specialist domestic abuse services within their area. We will also expect Boards to ensure that the voices and views of survivors have been considered in their decisions.

Local Authorities may wish to include other representation not listed above to support their local approach to tackling domestic abuse, this could include representation from similar or connected boards such as Community Safety Partnerships.

Local authorities may also wish to work across Tier One boundaries when developing Boards, needs assessments and strategies, creating and covering a wider footprint. We would encourage authorities to join up where possible and / or appropriate to do so.

We will work with local authorities in setting up their Boards, including sharing best practice examples where existing boards are working well.

## 4.5. The Local Partnership Board – Accountability

We recognise the importance and value of partnership between local authorities and a variety of agencies and service providers. We proposed that the Board would be responsible for performing specified functions as set out in the duty, including assessing the need for support for victims of domestic abuse within safe accommodation, developing local strategies to address the needs identified, commissioning services in line with strategies, and reporting back to Government.

### “We Asked...”

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Q12. Do you agree with the role and remit of Local Partnership Boards?

Q13. Do you agree with Local Partnership Boards assessing need for services?

Q14. Do you agree with Local Partnership Boards developing local strategies?

Q15. Do you agree with Local Partnership Boards commissioning domestic abuse services with Tier 2 Authorities?

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### “You Said...”

The majority of respondents, 79.4%, agreed with the role and remit of the Boards, including the requirement to assess need for services, developing strategies and commissioning safe accommodation services. However, 17% of respondents indicated the need for the Board to have a wider domestic abuse remit to encourage a more holistic approach to supporting victims and survivors at a local level.

Over 80% of respondents agreed with proposals for Boards to be responsible for assessing need for services and developing local strategies to address the needs identified.

*“this will ensure that all assessments are conducted using the same methodology and that they are accountable to the Board.”  
- A Tier One local authority*

There were a number of respondents that indicated the need for Boards to look at and support need wider than their local area. This was echoed throughout our informal consultation which highlighted cross-border issues which saw some victims being turned away when fleeing to an area outside of which they originally resided.

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## **“We Will...”**

We will develop the role and remit of the Board based on the one proposed in the consultation document, and set this out further in statutory guidance.

This includes lead authorities, working with the Board, being responsible for undertaking a robust local needs assessment of the supply and demand of safe accommodation services. The Board will also support lead authorities in developing and publishing local strategies based on the needs assessment and reporting back to Government.

We recognise the need to ensure that all survivors are able to access safe accommodation irrespective of where they originally reside. Many survivors fleeing domestic abuse will travel across borders in order to seek help and move away from the perpetrator.

We will therefore make clear Government expectations on cross border access by including specific mention of local authorities needing to meet the needs of all victims including those who present from outside of the locality, within the statutory guidance (see section 4.11).

This will seek to address some of the cross-border barriers we know some victims face when attempting to access support from an area outside of where they reside, to help ensure all victims will be able to access the support they need, when they need it.

## 4.6. Strategies

In this section we set out that when looking at examples of the delivery of support services to victims within safe-accommodation, research showed a strong correlation between authorities with a domestic abuse strategy and those providing domestic abuse services, particularly specialist safe accommodation provision. This would indicate that a strategy informed by a thorough needs assessment and strong partnership working supports delivery and focuses on delivering the best possible outcomes for victims

We recognise that many local areas already have existing strategies and partnerships that work well. However, there are many that do not have either in place. The proposals in the consultation therefore aim to create more consistency by requiring all local authorities to adhere to the proposed duty. This will mean in some cases, that local authorities would need to develop new strategies and approaches, and in others local authorities may need to adapt current approaches in order to meet the requirements set out.

### “We Asked...”

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Q16. Local authority/ providers: What would be the practical implications of meeting the proposed requirements of the statutory duty?

Q17. Local authority: What would be the financial implications of meeting the proposed requirements of the statutory duty?

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### “You Said...”

Many respondents highlighted the need for adequate resources in order to be able to effectively meet the requirements set out under this duty, with 61.2% of respondents indicating that further funding and/or staffing resources would be necessary to meet the statutory duty in response to Q16.

*“We would need more resources to do the underpinning work around needs analysis, convening and servicing the board, commissioning and strategy development. We are concerned that this will all fall on the local authority, rather than a true partnership approach.”*  
- A Tier One local authority

*“This would indicate a broad responsibility which would require significant resource. In terms of funding provision but also for the infrastructure work of supporting a Partnership, delivering a needs assessment, contract monitoring and management and partnership (joint commissioning) negotiations.”*  
- A Tier One local authority

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This was further emphasised in responses to Q17 on the expected financial implications with 43.1% of respondents stating that funding for local authority resources would be required. A quarter, 26%, of local authorities went further in responding and set out the need for secure ring-fenced funding in order to deliver the services.

*“Funding allocations need to be long term and based on a common needs assessment framework which provides transparency and ensures resources are allocated to those areas of greater need. Funding should also be ring-fenced.”*  
- A Tier Two local authority

*“The statutory duty has significant additional resource implications on local authorities (and partners) which cannot be met in the current financial envelope. Additional staffing will be required to respond to the statutory duty, particularly where there will be a requirement for reporting and monitoring which may be over and above any existing requirements...”*  
- A Tier One local authority

### **“We Will...”**

We recognise that introducing any new duty on local authorities will require additional support in setting up the relevant infrastructure in order to meet the duty. We will continue to work with local authorities in determining the administrative new burdens cost of delivering this new duty.

We will provide comprehensive guidance to local authorities in order to support in the undertaking and delivery of the requirements set out under the duty (see section 4.11). This will include a standardised needs assessment (see section 4.7) and associated guidance.

We acknowledge that local authorities will require support and advice in setting up new Boards and delivering the requirements set out, particularly during the early stages of implementation.

We will therefore provide support for local authorities during the implementation and delivery phases. We will also support in the sharing and dissemination of best practice to aid areas in learning from each other.

Throughout the consultation there was a call for adequate and dedicated funding to support the proposals set out. We are currently working closely with local authorities and stakeholders to identify the cost of delivering the new statutory duty. We would like to thank all those who have and are continuing to support us with this important piece of work. Further information on funding, including a full New Burdens Assessment, will be available in due course.

## 4.7. Needs Assessments

We proposed introducing an expectation that Boards would produce and publish local strategies informed by a robust assessment of need for support in safe accommodation. A lack of robust and reliable data on need makes it difficult to assess demand for and plan services. While there are a variety of sources of data Local Partnership Boards can draw on in assessing need, we proposed introducing a standardised needs assessment form to help them carry out this task.

### “We Asked...”

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Q18. Do you think that Government should develop a standardised needs assessment form for local areas to use in assessing need for domestic abuse support services?

Q19. How often should the needs assessment be conducted?

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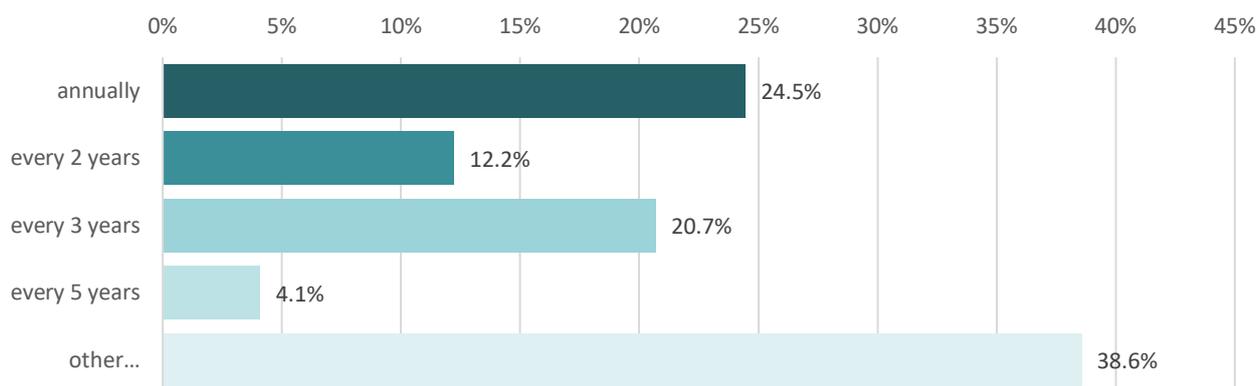
### “You Said...”

Around 80% of respondents agreed with the development of a standardised needs assessment in order to support local authorities in meeting their requirement. 28.4% of respondents believed the introduction of a standardised needs assessment was necessary to ensure a fair allocation of resources, and many commented that it would create more consistency across the country.

*“A standardised approach would ensure all local authorities were considering the same information. It should be developed in conjunction with local authorities and interested agencies.”*  
- An individual as a member of an organisation

Respondents also raised the need for the form to be designed in a way that would allow local variation to be taken into consideration. There were some concerns that a standardised form could unintendedly put restrictions on local authorities in conducting their needs assessment which in turn could result in some needs not being adequately assessed and met.

### Q19. How often should the needs assessment be conducted?



Whilst there was overwhelming agreement with the need to introduce a standardised form, there was little consensus on the duration of which local needs assessments would need to be conducted.

Around a quarter (24.5%) of respondents indicated that an assessment should be undertaken on an annual basis and around 21% favoured every three years. A number of comments also suggested that the frequency be flexible in order to be able to incorporate any changes in local need and/ or better link in with current local governance arrangements.

#### **“We Will...”**

We will develop a standardised needs assessment form to support Boards in conducting their local assessments, and to encourage consistency across the country.

In doing so, we will also produce guidance to go alongside this clearly setting out what is expected to be captured and how it should be completed. In developing the needs assessment and associated guidance, we will work closely with stakeholders to ensure it includes all relevant areas and is deliverable on the ground.

We recognise that areas will have local variants in regard to needs of victims within their area (including those who present from outside of the locality). We will therefore ensure there is scope within the standardised needs assessment form to take account of this variation.

Considering the differing views and approaches identified in regard to the frequency of conducting a needs assessment, we recognise that there is not a one size fits all approach. Areas need to be able to plan and commission long-term support within safe accommodation for survivors, at the same time as ensuring any change in need is picked up and appropriate measures of support are put in place in response.

As the responses to how frequent a needs assessment should be conducted varied considerably, we will require that as a minimum, a local needs assessment must be conducted every three years, but with an expectation that the assessment is refreshed or updated on an annual basis.

Local areas may wish to conduct full assessments on a more frequent basis in order to align with other local strategies. Government is clear that the requirements under this duty will not restrict areas from doing so should they wish to.

Government believes that local authorities are best placed to assess local needs and commission services within safe accommodation based on these needs. MHCLG will gain a national picture of need and provision through local authorities reporting.

## 4.8. Commissioning Support Services

We proposed that Tier One local authorities hold the responsibility for the commissioning and de-commissioning of safe accommodation support services. Commissioning of services would be required to be in line with their local strategy, which in turn would be informed by a robust needs assessment.

We appreciate that expertise in commissioning domestic abuse services sits at both levels of local authority within two tier areas, and with Boroughs in London. We therefore also set out that commissioning decisions should be made in partnership with Tier Two Authorities.

### “We Asked...”

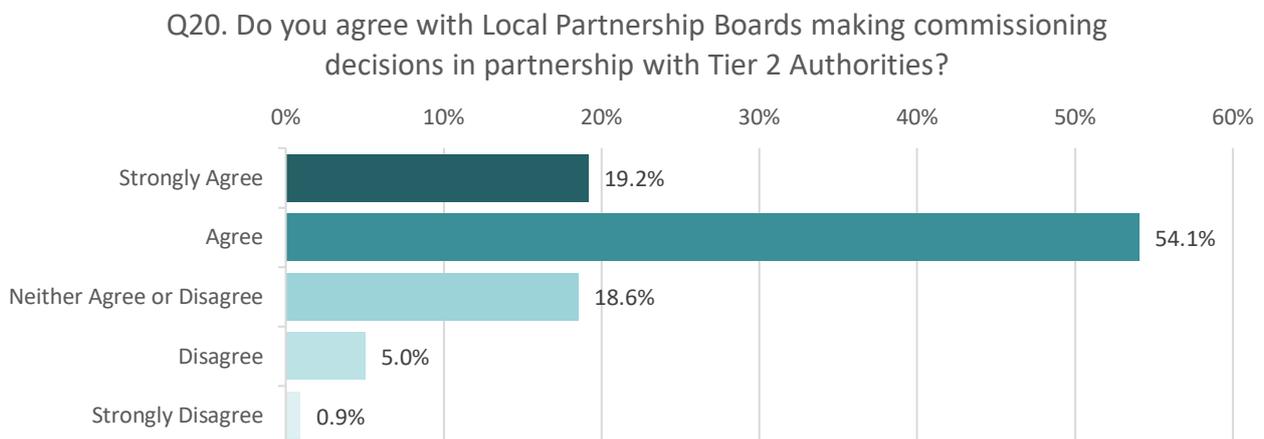
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Q20. Do you agree with Local Partnership Boards making commissioning decisions in partnership with Tier 2 Authorities?

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### “You Said...”

73.3% of respondents agreed with proposals for Tier One authorities, as convener and chair of the Board, making commissioning decisions in partnership with Tier Two authorities. However, some respondents did raise concerns in regard to accountability potentially becoming lost and confusing, and that Government should make clear where the overall responsibility should sit.



## **“We Will...”**

We recognise that support from Tier Two authorities and London Boroughs will be critical to the success of a future system, not least given their responsibilities for housing and their experience of commissioning domestic abuse services.

To ensure clear accountability, we will require Tier One authorities as convener and chair of the Board to make commissioning decisions. However, they will need to have regard to the strategy and working with Tier Two authorities in recognition of their local expertise and intelligence on local need and the level of appropriate support required.

It will be open to Tier One authorities to delegate commissioning decisions to Tier Two authorities by mutual agreement. Where authorities have mutually agreed to pass on some or all responsibility to Tier Two authorities, we will make clear in guidance that adequate funding to fulfil the agreed requirements must be passed down by Tier One authorities. Where this is the case, overall accountability of fulfilling the duty will still lie with Tier One authorities.

To fulfil their statutory duty to co-operate with the Tier One local authority, Tier Two authorities must provide any relevant data they have to help inform needs assessments, contribute to the development of local area strategies, and report on outcomes relating to services which they have commissioned where delegated to do so.

As previously set out, specialist domestic abuse service providers will play an important role on local Boards. However, it would not be appropriate for service providers to be present or involved when commissioning decisions are being made, to ensure services are commissioned on an open, fair and transparent basis.

## 4.9. Reporting on Outcomes

We proposed introducing standardised reporting to complement the standardised needs assessment, and to enforce stronger accountability on local authorities. We proposed a range of themes to make up the reporting including evidence local strategies were in place, evidence of adequate needs assessments, evidence of commissioning decisions being informed by needs assessments, the impact of decisions locally and evidence of adequate provision for all victims.

### “We Asked...”

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Q21. Do you agree that standardised reporting would promote accountability and transparency?

Q22. Do you agree with the reporting themes suggested?

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### “You Said...”

The majority of respondents agreed with proposals on the reporting of outcomes, with 82.8% in favour: 25.1% strongly agreed, 57.7% agreed and only 5.7% either disagreed or strongly disagreed. Of local authority respondents, 84% were in favour, and of organisations responding 83.4% were in favour. Common themes amongst responses related to the need for transparency in reporting and that the needs of the service user need to be reflected in the reporting.

*“This is vital to ensure consistency of support and to avoid a Postcode Lottery. It will also ensure that local authorities are clear on what is expected of them.”*

*- An individual as a member of an organisation.*

*“Yes, evidence-based reporting will improve accountability.”*

*- A Tier Two local authority*

Respondents were generally in favour of the reporting themes proposed with 62.9% in favour and 17.6% in disagreement. However, some respondents suggested that measures of service outcomes and service user feedback should be incorporated within the reporting themes.

### “We Will...”

We will develop a standardised reporting format to support local authorities in reporting back to Government on the delivery and outcomes of this new duty. This will also help Government to monitor how the system is working, where the challenges are, how funding is being used, learn about best practice, and ensure local authorities are held accountable where the needs of victims are not being met.

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We will do further work to refine the reporting themes, working closely with local authorities and stakeholders to ensure appropriate evidence is provided back to Government. We will explore including additional themes such as a measure to capture the views and experience of survivors and evidence of service delivery outcomes.

We will analyse the data provided by local authorities to understand the national picture of provision of support in safe accommodation, including specialist provision for victims and survivors with protected characteristics. This will help Government to identify areas that may require further support, as well as to identify best practice and evaluate service outcomes and value for money at a national level. The minister chairing the National Steering Group for will take appropriate action should a local area face particular challenges in fulfilling its duty.

Summary data will be presented at the National Steering Group, which will monitor and evaluate progress to ensure needs are being met through local delivery, as further elaborated in the section below.

## 4.10. National Oversight

We proposed that Government would establish a ministerial led National Steering Group ('Group') to monitor and evaluate delivery of the new duty. We proposed that membership of the group could include representatives from local government, Police and Crime Commissioners (PCCs), health bodies, specialist domestic abuse service providers and housing associations.

We also set out that we would ensure other parts of Government are represented in the group to support a joined up approach to tackling domestic abuse. This included the then proposed Domestic Abuse Commissioner.

### “We Asked...”

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Q23. Do you agree with the role and remit of the National Steering Group?

Q24. Do you agree with the proposed representation on National Steering Group?

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### “You Said...”

Overall the majority of responses, 61.6%, were in agreement with the role and remit of the Group. 67.9% of local authorities and 52.3% of other organisations were in favour of the role and remit.

This is in contrast to 10.4% local authorities and 30.7% of organisations whom did not agree. Responses from individuals indicated that they were, by and large, in agreement with the role and remit with 78.6% in favour and 20.9% indicating that they neither agreed nor disagreed.

*“Yes. The National Steering Group should highlight the importance of accommodation-based support for victims of domestic abuse, and give this issue a higher national profile and significance.”*  
- A Tier One Local Authority

*“We strongly support the role of a national oversight mechanism as it offers the potential to monitor, oversee and evaluate national provision of domestic violence accommodation-based services, highlighting gaps and sharing good practice...”*  
- A Tier Two Local Authority

Of those that disagreed, 40.3% indicated that the National Steering Group would need stronger powers in order to be effective. This sentiment was also echoed within 5.1% of those that agreed with the role and remit of the Group.

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*“[We are] concerned that the national steering group proposed will not be able to deliver the significant reforms required to deliver a sustainable funding system that ensures the national demand for support is met in services resourced to meet the needs of survivors and their children.”*  
- An Individual as a member of an Organisation

Similarly, most respondents also agreed with the proposed representation of the National Steering Group with 53.75% in favour, in particular 71.7% of local authorities and 42.8% of other organisations that responded agreed.

*“[We] broadly agrees with the proposed representation on the national steering group. We also welcome the creation of a specific ‘Domestic Abuse Commissioner’, that the group will be chaired by an MHCLG minister and particularly that it will have cross governmental representation.”*  
- An Individual as a member of an Organisation

Of all responses to the proposed representation the most common theme identified was an ask for wider representation including from bodies outside of safe-accommodation. Many respondents also called for wider cross government representation, to include departments such as Ministry of Justice (MoJ) as well as Police, Department of Health and Social Care Health and Department for Education.

*“Yes, particularly need cross governmental representation, e.g. MoJ, Home Office, MHCLG to ensure consistency of central government funding approach to domestic abuse. Should also have UK Borders and Immigration Service on Group...”*  
- A Tier One local authority

### **“We Will...”**

We will develop and publish a Terms of Reference to make clear the role and remit of the Group. This will include setting out the desired delivery outcomes of the group, as well as expectations on which bodies will form the Group’s core members, to ensure the right level of knowledge and expertise is in place.

We recognise the points raised in regard to ensuring other government departments are well represented on the Group. As set out in proposals, other departmental ministers will attend meetings of the National Steering Group where appropriate, to enable join up and cross government working.

To further support a joined-up approach, we will work closely with the Home Office and the Domestic Abuse Commissioner to define their inclusion in the National Steering Group.

The Group will consider the analysed monitoring and evaluation reports provided by local authorities. The Group will review the operation of local needs assessments and provision of domestic abuse support in safe accommodation across the country, considering specifically specialist provision for those who share relevant protected characteristics and services that serve a national rather than local need. The Group will monitor delivery progress, by comparing year-on-year data and reviewing outcomes.

The Group will consider whether monitoring information suggests that any areas require further support to implement the statutory duty effectively. The diverse expertise of its membership will support the Chair to address these areas requiring additional support, including advising Ministers if changes are required to the statutory guidance (see below). The Group will also publish an annual report summarising progress across the country, sharing best practice and setting service standards.

## 4.11. Guidance

MHCLG want to set a clear vision for the delivery of safe accommodation support services and the Priorities for these services. We therefore proposed developing statutory guidance for local authorities to underpin the duty, setting out how delivery would work in practice and to clearly outline the expectations government has for local authorities in delivering their duty.

### “We Asked...”

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Q25. Do you agree with the overall approach of the statutory guidance?

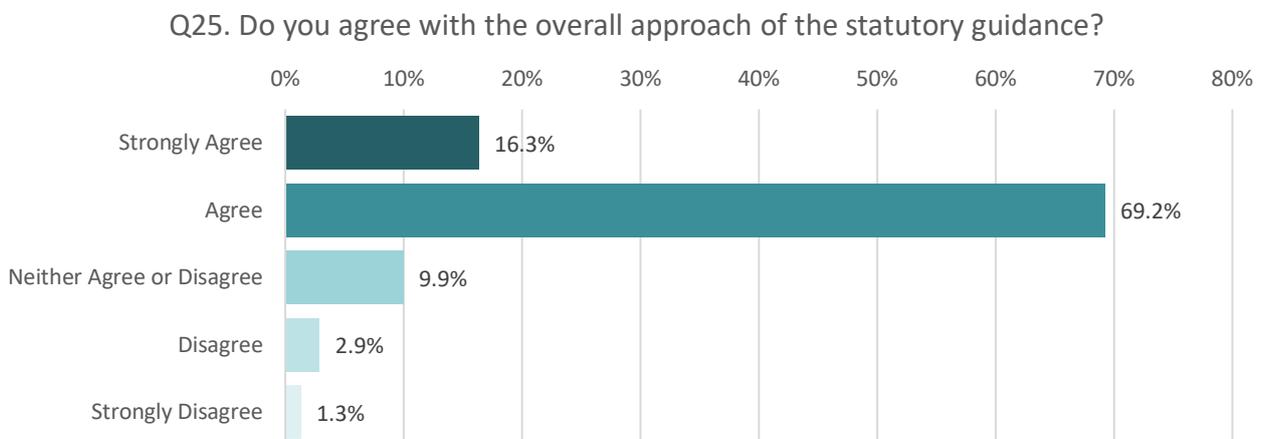
Q26. What else would you like to have set out within the Guidance?

Q27. What support would you find most useful to meet the requirements of the statutory duty and guidance?

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### “You Said...”

The majority of respondents (85.6%) agreed with the overall approach to developing statutory guidance to support local authorities in the delivery of this new duty.



When asked what else respondents would like to see set out in the guidance, 25.2% called for guidance to set out requirements for service quality and standards.

*“We recommend that the statutory guidance includes requirements for standards for local delivery and service quality, including the provision of services that meet recognised quality standards and deliver positive outcomes for survivors and their children.”*  
- An individual as a member of an organisation

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Adequate and sustainable funding was highlighted most amongst responses when asked about the support needed to meet the requirements of the statutory duty, with 50.6% of respondents mentioning it within their response. This sentiment was represented evenly across local authorities, 46.2%, and other organisations, 43.5%.

It is also evident from the consultation responses that some would like to see the guidance widened to include support outside of safe accommodation, with 25.6% referencing services outside of safe accommodation of which organisations contributed to 54.8% of the responses.

*“...it is crucial that the guidance sets out the approach of the partnership board in overseeing all - not only accommodation based - types of domestic abuse service provision, and ensuring that the statutory duty is one part of a ‘whole housing’ approach to domestic abuse within local areas...”*

*- An individual as a member of an organisation*

### **“We Will...”**

Government recognises that there is a balance to strike between providing local authorities with flexibility to meet particular local needs and to build on well-established existing approaches, with the need for a consistent approach to the provision of support within safe accommodation across the country.

Given the clear agreement from respondents on the approach to produce statutory guidance to underpin this duty, we will develop comprehensive guidance based on the outcome of this consultation which all local authorities must have regard to.

Government will make clear in the statutory guidance that support commissioned under this duty should meet clear quality standards along the lines of the Violence Against Women and Girls National Statement of Expectations<sup>3</sup> and MHCLG’s Priorities for Domestic Abuse.<sup>4</sup>

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/574665/V\\_AWG\\_National\\_Statement\\_of\\_Expectations\\_-\\_FINAL.PDF](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/574665/V_AWG_National_Statement_of_Expectations_-_FINAL.PDF)

<sup>4</sup> Annex B of the Consultation on Future Delivery of Support to Victims and their children in Accommodation-based Domestic Abuse Services.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/801097/D\\_A\\_Consultation\\_Document.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/801097/D_A_Consultation_Document.pdf)

As mentioned throughout this document, we recognise and understand the importance of community-based domestic abuse services. This Government wants to ensure survivors and victims continue to have access to a range of support appropriate to their needs. We have been clear that this duty will only cover the delivery of support in safe accommodation services. However, we would expect local authorities to ensure that the delivery of this duty does not negatively affect the provision of community based support and should consider how services outside of safe accommodation will operate alongside this duty. Nothing in this duty will prevent them from doing so.

We will also make clear in guidance how this duty links in with other duties and requirements on local authorities, such as those relating to homelessness and community safety.

We will conduct further informal consultation with stakeholders in developing this guidance. We intend to publish full statutory guidance in due course.

## 4.12. Providing support to all victims

We know how important high-quality support is to helping victims to recover from the trauma of abuse and move on with their lives. This includes children who experience domestic abuse. Through the proposals set out in the consultation, we aimed to help local areas ensure that all victims are able to access and receive the support they need within safe accommodation when they need it.

### “We Asked...”

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Q28. Do you think that the proposed policy will help local areas ensure the needs of all victims and their children can be met?

Q29. What more could the Government do to ensure the needs of victims and their children with protected characteristics are supported?

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### “You Said...”

Whilst half of respondents agreed that the proposed policy will help meet the needs of all victims including children, a high proportion of respondents did not believe the proposed policy would help, 33.4% responding ‘No’ to question 28 compared to 49.8% answering ‘Yes’.

Of those that responded to Q29, two key themes were evident in their responses. Almost a quarter of comments, 23.3%, suggested that more needs to be done for isolated and/or marginalised victims such as disabled, LGBT and those from BAME backgrounds. Also 25.2%, of respondents suggested that further links should be made to wider domestic abuse services, outside of accommodation-based services.

### “We Will...”

This duty and the proposals set out here and in the consultation document are just one part of a comprehensive package of measures being taken by this Government to tackle domestic abuse and ensure appropriate support within safe accommodation is available to survivors. MHCLG will continue to work with all relevant government departments to ensure join up and explore the cross-government approach to tackling domestic abuse.

We intend to make clear through the statutory guidance that Boards will be required to take steps to understand the additional barriers that may prevent victims with protected characteristics from accessing support in safe accommodation services. Local strategies will also need to clearly set out how Tier One authorities, working with and through the Board, will address the barriers identified.

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Where appropriate, we will also encourage authorities to work in partnership and pool funding in order to address the needs of victims and survivors from isolated and/or marginalised communities, across a wider geographical footprint.

The Government is clear that victims of domestic abuse should be treated first and foremost as victims and all the measures in the Bill apply equally to all victims of domestic abuse in England and Wales. We do recognise, however, that there are some migrant victims who do not have access to immediate support. That is why, in response to the recommendations made by the Joint Committee on the draft Domestic Abuse Bill, the Government is undertaking a review into the overall response to migrant victims of domestic abuse.

As set out in the consultation document, the ministerial led national steering group will also specifically consider as a standing agenda item, whether the support needs of all victims are being met at both a national and local need.