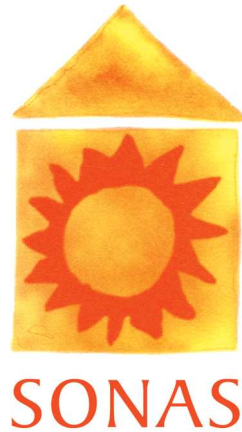


Submission to Cosc on the National Strategy on Domestic Violence, Sexual and Gender-based Violence from Sonas Housing Association Ltd.



Introduction

Sonas welcomes the opportunity to make a submission to Cosc on the National Strategy on Domestic Violence, Sexual and Gender-based Violence. Sonas is a specialist feminist voluntary housing organisation which provides supported transitional accommodation to women and children who are out of home primarily as a result of domestic violence. For this reason Sonas' primary area of interest is in relation to the effect of gender-based violence against women which can result in women and children being out of home and in need of accommodation with support.

The main thrust of the submission from Sonas Housing Association on the National Strategy on Domestic Violence, Sexual and Gender-based Violence is as follows:

1. To establish the link between domestic violence and homelessness / accommodation need and the need for co-ordinated responses in the strategy.
2. To include in the strategy responses to address the accommodation need at a local and national level to include identified roles for statutory and voluntary providers.
3. To identify a lead role for Cosc in relation to the co-ordination of domestic violence and homelessness / accommodation responses for victims and to ensure participation of the NGO service providers in implementation and monitoring structures at both regional and national level.

Summary of Sonas' Submission on the Strategy on Domestic Violence, Sexual and Gender-based Violence

Sonas' submission is asking for the following to be taken into account in the new strategy:

1. To establish the link between domestic violence and homelessness / accommodation need and the need for co-ordinated responses in the strategy

Recommendation 1 (a): The strategy should identify the need for a new national study that quantitatively examines the impact of domestic violence on homelessness/housing need in Ireland, together with a timescale for implementation of this study.

2. To include in the strategy responses to address the accommodation need at a local and national level to include identified roles for statutory and voluntary providers.

Recommendation 2 (a): The strategy should include a timeframed action plan for the development of women's refuges with clear identified roles for local authorities, the Department of the Environment, Heritage and Local Government (DEHLG), the Health Services Executive (HSE) and the voluntary providers to make this happen.

Recommendation 2 (b): The strategy should identify the need for a 'wet refuge' in the Dublin area (and a timeframe for implementation) which will provide emergency accommodation, as well as specialist domestic violence, addiction services and mental health services.

Recommendation 2 (c):

- It should include a commitment and targets for the reduction of the use of B&B accommodation for families who are homeless due to domestic violence.
- The strategy should commit to the expansion of refuge services (and adequately resource them) to facilitate them accommodating older children, especially teenage boys.

Recommendation 2 (d): The strategy should identify the need for targets for the provision of refuge, transitional and permanent housing responses to accommodate the victims of domestic violence, together with identified lead agencies and ring-fenced resources.

Recommendation 2 (e): The strategy should identify the need for an appropriate standardised approach to accommodation provision for victims of domestic violence, together with policy guidelines regarding domestic violence for local authorities and the HSE to take account of 'eligibility' and housing management/tenancy issues.

Recommendation 2 (f): The strategy should identify the need for clear guidelines in relation to funding services which combine housing and support for victims of domestic violence as this is currently open to local interpretation and inconsistencies between local authority areas and within the HSE.

3. To identify a lead role for Cosc in relation to the co-ordination of domestic violence and homelessness / accommodation responses for victims and to ensure participation of the NGO service providers in implementation and monitoring structures at both regional and national level

Recommendation 3 (a):

- The national strategy should address homelessness due to domestic violence, with an action plan which cascades down to local authorities, HSE local offices, other public agencies and to the voluntary sector. Cosc working with the HSE and DEHLG should play a key role in this.
- The need for and commitment to the development of guidelines and codes of practice (together with clear responsibilities) for local authorities and service providers in relation to responses to homelessness as a result of domestic violence.
- A key role for Cosc in monitoring implementation of the national strategy which provides for regular reports on progress to government and to cross-sectoral implementation and monitoring structures. It is important that other government departments are accountable to Cosc on the implementation of a cross-departmental strategy. This should help ensure that Cosc can implement such a strategy especially in the area of service provision.

Recommendation 3 (b): That in any new implementation and monitoring structures at regional and national level for the National Strategy on Domestic Violence, Sexual and Gender-based Violence that appropriate NGO representation be sought.

1. Identify the link between domestic violence and homelessness / accommodation need in the new strategy

Sonas believes that if a woman is experiencing or is in danger of experiencing domestic violence that she is living in insecure accommodation and can therefore be deemed to be homeless under the Housing Act 1988 and as such is eligible as homeless. Sonas believes that abuse affects every aspect of a victim's life and as such, responses to abuse and violence must be holistic in nature. Sonas aims to provide its tenants with high quality housing and a range of supports to equip them with the skills to live independent lives in more permanent housing.

The link between domestic violence and homelessness is clear. In a report on domestic violence in Ireland, Kearns, Coen and Canavan (2008) found that 55% of victims of domestic violence vacated the family home. Other studies have provided evidence that the majority of women who do not vacate the home (88%) do not leave violent partners because they have nowhere to go and because of the lack of affordable accommodation (*Making the Links* (Kelleher and Associates, and O'Connor, 1995). These figures highlight the extent of housing need for women in situations of domestic violence and the reality of having to stay in a violent relationship because of problems of access to housing.

There has not, however, been a national study that quantitatively examines the impact of domestic violence on homelessness in Ireland. International studies suggest that between 20-40% of homeless people are without a home due to domestic violence

(Reeve, Goudie & Casey 2007, ACLU 2004). In 2007, a working group of the Homeless Agency looked at a population of 36-40 homeless women with multiple needs in Dublin and found that 2/3 had drug related support needs, 1/3 had alcohol related support needs and over 1/3 had experienced domestic violence.

Recommendation 1 (a):

- For Cosc to identify in the new National Strategy the need for a national study that quantitatively examines the impact of domestic violence on homelessness/housing need in Ireland, together with a timescale for implementation of this study.

2. Improve current responses to homelessness & housing need arising from domestic violence

There are a number of responses to homelessness due to domestic violence. Some, including Sonas, address accommodation and support needs, whilst others provide purely an accommodation response. Agencies of the state, namely the local authorities and the HSE, play a crucial role by financially supporting these responses and enacting policies and practices that directly impact on the responses.

The Refuge Response

Each year a significant number of women and children cannot be accommodated in refuges due to lack of space. In 2004, the three refuges in the Eastern region refused twice as many women as they accommodated; 1,144 women were refused refuge. Anecdotally, refuge managers are reporting longer lengths of stay in refuges due to lack of move-on options into social housing, transitional housing or into the private rented sector – these sometimes being due to lack of provision and sometimes due to financial, social housing or homeless eligibility criteria of the local authorities.

Not only is the number of refuge spaces unable to meet current demand, but also the level of provision falls short of international recommendations of 1.7 bedspaces for every 10,000 population. The Dublin area would need to have 201 refuge bedspaces to meet current population levels. We currently, however, have only 31 rooms and a further 12 under construction. By 2021, based on population projections, we will need 245 refuge bedspaces. The development of the Blanchardstown refuge tells us that the lead-in time for such a facility may be up to twelve years. In order to meet the level of current demand and the projected level of demand for refuge provision by 2021, there is a need for a timeframed action plan with clear identified roles for local authorities, the DEHLG, the HSE and voluntary providers to make this happen.

Recommendation 2 (a):

- In the strategy, there is a need for a timeframed action plan for the development of refuges with clear identified roles for local authorities, the DEHLG, the HSE and the voluntary providers to make this happen.

As we know from research, violence against women has many negative health consequences. The negative health outcomes for women can include poor mental

health with victims suffering from depression, anxiety, phobias, self-harm and parasuicide. Others engage in negative health behaviours as a result of the impact of domestic violence including smoking, and alcohol and drug abuse. (The Women's Health Council, 2007)

Many refuges are accommodating women with these complex needs of mental health and addictions and in some cases are unable to cater for high needs women with active addictions. The Homeless Agency's working group in 2007 on women with complex needs also identified this group of women with complex needs who are homeless. This highlights the need for a 'wet refuge' in the Dublin area which will provide an integrated service providing emergency accommodation, specialist domestic violence services, addiction services and mental health services.

Recommendation 2 (b):

- The strategy should identify the need for a 'wet refuge' in the Dublin area (and a timeframe for implementation) which will provide emergency accommodation, as well as a specialist domestic violence service, addiction services and mental health services.

B&Bs and Hostels

Families who are not accessing refuges, either because of a lack of space or because of the age of their children, must turn to alternate options for emergency accommodation. Not only do hostels and bed and breakfast establishments not have specialist domestic violence support services, but also in some cases these facilities may be exposing victims of domestic violence to further risk from 'high needs' homeless persons. The Homeless Agency's 2005 survey found that there were 220 homeless families with children under 18 in Dublin. 463 children were residing in B&B and of these children, 41% were aged under-5 years. The majority of these families (73%) were in emergency bed and breakfast accommodation (Homeless Agency 2005).

Recommendation 2 (c):

- The Strategy should include targets for the reduction of the use of B&B accommodation for families including those who are homeless due to domestic violence. The UK has implemented targeted measures for B&B reduction and Ireland should follow suit.
- There is a need to expand refuge services (and adequately resource them) to facilitate them accommodating older children, especially teenage boys.

Move-on accommodation – transitional and permanent housing

Sonas provides a specialist domestic violence transitional housing service. Other voluntary domestic violence organisations also provide small numbers of units around the country. A recent HSE report on domestic violence (prepared by NUIG), highlights the need for refuge, transitional and permanent housing to respond to the accommodation needs of victims.

Recommendation 2 (d):

- The need and targets for refuge, transitional and permanent housing responses to accommodate the victims of domestic violence should be included in the new strategy together with identified lead agencies and ring-fenced resources.

The Local Authority Response

The local authorities, with the HSE local offices, have a significant role in responding to homelessness as a result of domestic violence. Firstly, the local authorities record causes of homelessness in their assessment of homeless and housing eligibility for women who are out of home due to domestic violence. Local authority policies and practices directly impact the eligibility of female homeowners, women who have had to flee their area of origin to be safe and women without residency status. Secondly, the ways in which local authorities deal with housing management and tenancy issues for a woman who is a victim of domestic violence who is a joint local authority tenant with the perpetrator has very serious implications for whether she can stay in the family home (or indeed whether she can access local authority housing in the future).

There appears to be increasing numbers of women who are joint owners of the family home who are accessing refuge and support services and who are applying for homeless services. These women may have very limited housing options due to the interpretation of eligibility for homeless accommodation by local authorities. Depending on the local authority interpretation and local practice, a woman may be unable to access homeless services or social housing until after lengthy civil proceedings for separation or an inadequate settlement from the sale of the home. These processes can take 2-3 years to conclude.

Another group of women accessing refuge and who have few or no move-on options after refuge are women with temporary residency status. Sonas proposes a review of 'eligibility' requirements and consideration to be given to the use of temporary lettings (of local authorities or voluntary housing providers) until such time as status has been determined.

There are inconsistencies between local authorities in how they assess homelessness - in some cases domestic violence is not even considered as a possible cause. In addition, the Homeless Persons Unit in Dublin last year suggested that it was impossible to identify the extent of homelessness due to domestic violence, suggesting that it might be hidden in other listed causes such as 'family violence', 'anti-social behaviour' and 'family breakdown'

Recommendation 2(e):

- The strategy should identify the need for an appropriate, standardised approach to accommodation provision for victims of domestic violence, together with policy guidelines regarding domestic violence for local authorities and the HSE to take account of homeless 'eligibility' and housing management/tenancy issues.
- For local authorities statistics on homelessness and housing need due to domestic violence to be collated nationally.

The HSE Response

As previously mentioned, the HSE has a key role in meeting the needs of women who are out of home due to domestic violence in refuges and in homeless hostels, particularly those women who may need addiction, mental health and child protection services. Social workers are sometimes involved and families may need family support services. Furthermore, because the HSE has a lead role in national homeless initiatives, its role in funding domestic violence-related services is substantial.

In most areas, the HSE funds refuges. But in a number of other areas the local authority pays Section 10 homeless funding to refuges. In the Dublin area, transitional housing is funded through the Homeless Agency by both the HSE and the relevant local authority (broadly with the care element being funded by the HSE and the settlement and housing service being funded by the local authority). However, outside Dublin, confusion within complex funding schemes leads to delays in getting new services established and in ensuring ongoing funding of long established specialist domestic violence housing services.

Recommendation 2(f):

- The strategy should identify the need for clear guidelines in relation to funding services which combine housing and support for victims of domestic violence as it is currently open to local interpretation and inconsistencies between local authority areas and within the HSE.

3. A Key Role for Cosc and Participation of NGOs in the Implementation of the new Strategy

Key Role for Cosc

Ireland needs a clear, coherent national strategy and an action plan on domestic violence (part of which address homelessness due to gender based violence against women that cascades down to local authorities, HSE local offices, other public agencies and to the voluntary sector).

The new draft Homelessness Strategy clearly identifies the link between domestic violence and homelessness and highlights the need for research into domestic violence and homelessness. Cosc will play a key role in implementing these goals in the National Homeless Strategy and the new National Strategy on Domestic Violence, Sexual and Gender-based Violence. Through regular meetings with the HSE and DEHLG, Cosc can ensure co-ordination between these agencies in relation to both strategies.

The National Strategy on Domestic Violence, Sexual and Gender-based Violence should identify the need for and a commitment to do the following:

- Develop guidelines and codes of practice for local authorities and service providers
- Clarify roles and responsibilities of DEHLG, local authorities and HSE (and funding)
- Assign a key strategic role to the local authorities in planning for future refuge provision to meet international guidelines on levels of provision
- Change housing legislation to:
 - Explicitly incorporate domestic violence in the definition of homeless
 - Treat breaches of barring orders/protection order as breaches of tenancy agreements and reverting to a sole tenancy for the victim
 - Interpret violence against a person on the tenancy as anti-social behaviour and therefore a breach of tenancy

Cosc's role should be to ensure a 'whole of government' approach to implementing the strategy and the action plan. Cosc should have a key role in monitoring implementation and reporting on progress with the strategy to government and to cross-sectoral implementation structures.

Recommendation 3(a):

- The national strategy should address homelessness due to domestic violence, with an action plan which cascades down to local authorities, HSE local offices, other public agencies and to the voluntary sector. Cosc, working with the HSE and DEHLG, should play a key role in this.
- The strategy should identify the need for and a commitment to develop guidelines and codes of practice, with clear responsibilities for local authorities and service providers.
- Cosc should have a key role in monitoring implementation and reporting on the progress with the strategy to government.
- For Cosc to establish cross-departmental ways of working where other departments are accountable to Cosc on the implementation of a cross-departmental strategy. This should help ensure that Cosc can implement such a strategy especially in the area of service provision.

Participation of NGOs in the Implementation and Monitoring Structures

The structures of the Regional Planning Committees and the National Steering Committee on Violence against Women have ensured participation of the voluntary sector in violence against women policies, programmes and actions over the last number of years.

Sonas recognises the value of participation by NGOs and asks that in any the new implementation and monitoring structures at regional and national level for the National Strategy on Domestic Violence, Sexual and Gender-based Violence that appropriate NGO representation be sought.

Recommendation 3(b):

- That in any of the new implementation and monitoring structures at regional and national level for the National Strategy on Domestic Violence, Sexual and Gender-based Violence that appropriate NGO representation be sought.