

solace

**Safe Lives.  
Strong Futures.**

Rt Hon Simon Clarke MP  
Chief Secretary to the Treasury  
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And;  
Rachel Maclean MP,  
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18 March 2022

Dear Chief Secretary to the Treasury,

### **Expanding the exemption to the shared accommodation rate include sexual violence victims aged under 35**

Solace is one of the largest providers of services for survivors of domestic abuse and sexual violence in the UK, supporting over 23,500 survivors of male violence a year. Along with our partners and sector colleagues listed below, we are asking you to widen the Treasury's planned exemption to the shared accommodation rate for victims of domestic violence and trafficking aged under 35 to include survivors of sexual violence and to provide urgent and immediate support to the most vulnerable women exposed to the cost-of-living crisis.

**Free advice line  
0808 802 5565**

**[solacewomensaid.org](http://solacewomensaid.org)**

Registered address | Moore Kingston Smith | Devonshire House | 60 Goswell Road | London | EC1M 7AD  
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Registered in England and Wales (3376716). Charity Number 1082450



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The Government has recognised the housing need for younger victims and survivors of domestic abuse and trafficking, who desperately need access to independent accommodation for their safety.

To support the Government's commitment to end rough sleeping in this Parliament, in the Spring 2020 Budget the Chancellor of the Exchequer announced he was introducing additional exemptions from the Shared Accommodation Rate for Universal Credit and Housing Benefit claimants to protect those at risk of homelessness. In Spring 2020, the Government said the measure would be effective from October 2023 with an estimated cost of £10 million in 2023-24 and £15 million in 2024-25.

This exemption covers:

- Rough sleepers aged 16-25;
- Care leavers up to the age of 25; and
- Victims of domestic abuse and human trafficking.

The exemption was brought forward by over two years to May 2021 for the first two groups and to October this year (2022) for the final group, announced in the Government's Autumn Budget and Spending Review in October last year.

### **Rape and Sexual violence**

The data on sexual violence including rape as a cause of homelessness is limited, but through our work with survivors of sexual violence particularly the rape crisis service we run in north London and our specialist partnership programmes working with women experiencing street homelessness, we know it is both a cause of homelessness and increases for women already homeless, and for vulnerable young women the lack of available support can be particularly traumatising.

While the data on homelessness is not broken down into forms of violence, according to the Government's latest data, nearly 3,000 people were threatened with homelessness by some form of violence or harassment in 2020-21 (owed a prevention duty) and 5,660 were made homeless in 2020-21 (owed a relief duty).



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The number of people made homeless by violence or harassment has increased by nearly 40% over the last two years, from 3,420 in 2018-19 (Department for Levelling Up, Housing and Communities: Live tables on homelessness, 2022).

The Office for National Statistics (ONS)' analysis of the most recent Crime Survey for England and Wales showed that in the year ending March 2020 773,000 people were sexually assaulted, 80% of whom were female. The ONS also reports that 37% of rapes and assaults by penetration happen in the victims' home – higher for women than men, and that 38% of victims are aged 16 to 34.

For women who experience street homelessness, the likelihood of sexual violence is more than three times higher than the general population. The ONS reports that 7% of women in the general population had experienced sexual assault by rape or penetration (including attempts) since the age of 16 years. In 2017, Crisis found that 30% of the women they surveyed who were current or recent rough sleepers had experienced sexual violence at some point while homeless, and 60% had been threatened with violence.

Our caseworkers and advocates have worked with younger women who have been housed in completely unsuitable and unsafe mixed-gender accommodation, including large hostels where there is drug-taking in the communal areas. We have found that there is a real lack of recognition of the vulnerability of this age group in local housing departments. Young women who have been abused and exploited are told by housing officers to check websites where houses in multiple occupation are advertised, such as Spare Room or Gumtree, expecting them to approach and move in with complete strangers.

Some survivors choose to stay with family rather than take the risks of shared accommodation, but for Black and Minoritised survivors including survivors of so-called 'honour' based violence this is not always an option. Local authorities also tend not to take account of cultural or religious needs when placing women in shared accommodation.



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For women who have been raped or sexually assaulted, including where the perpetrators were their flat mates or friends of flat mates (12% of sexual assaults are perpetrated by victims' friends), the expectation on them to share accommodation fails to recognise the trauma they have experienced, the ongoing risk to their safety, and the emotional or psychological impact on them. Experiencing rape can be debilitating and for some survivors leaves them unable to continue working. They too should be supported while they recover and should be exempt from the shared accommodation rate.

In June 2021 the then-Minister for Children and Families, Will Quince MP, suggested local authorities could use Discretionary Housing Payments (DHP) for those for whom shared accommodation was unsuitable, but DHP is limited and is being reduced by £40 million between 2021-22 and 2022-23. In our experiences local authorities are rarely if ever prepared to use it to top up the shared accommodation rate.

### Cost of Living Crisis

The global energy crisis combined with the impacts of the horrendous war waged by Russia against Ukraine is resulting in rocketing energy costs for households combined with rising living costs resulting from the pandemic, global inflation rises and stagnant wage growth.

Increasing poverty is associated with an increase in VAWG including domestic abuse and we are still seeing higher levels of need for our services than before the pandemic.

We therefore join others calling for urgent action on the general cost of living crisis with targeted support for those at the sharpest end. In this Spring Statement we urge the Chancellor to:

- Address the energy crisis with additional support for households to help pay their energy bills;
- Restore the Universal Credit uplift and increase all other benefits at least in line with inflation; and
- Lift the benefit cap which disproportionately impacts women with children making them more vulnerable to abuse and making it harder for them to recover from abuse.

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The Treasury has recognised the gap that exists for under 35s who have experienced domestic abuse and has already implemented exemptions for other vulnerable groups.

Since April 2021 to date, we have worked with over 550 survivors aged under 35 who have been made homeless by domestic abuse in this period, over 200 of whom did not have children and therefore subject to the shared accommodation rate.

While we recognise the Government's efforts to bring this exemption forward to October, in light of the growing barriers to this groups' independence and recovery, we ask the Department for Work and Pensions to urgently implement this change as we are working now with young women being forced to choose between unsafe accommodation and staying in unsafe relationships.

Yours Sincerely,

Judith Banjoko, Interim CEO, Solace  
Shaminder Ubhi, Director, Ashiana Network  
Jayne Butler, CEO Rape Crisis England and Wales  
Yasmin Rehman, CEO, Juno Women's Aid  
Diana Nammi, Executive Director, IKWRO – Women's Rights Organisation  
Dr Nicola Sharp-Jeffs OBE, CEO, Surviving Economic Abuse  
Thea Raisbeck, Honorary Research Fellow, University of Birmingham  
Rick Henderson, Chief Executive, Homeless Link  
Annie Howell, Deputy CEO, IRISi Interventions  
Gavin Smart, CEO, Chartered Institute of Housing  
Indy Cross, CEO, Agenda  
Ashley Horsey, Chief Executive, Commonweal Housing  
Guddy Barnet, CEO, Standing Together  
Susie Thompson, Executive Director of Housing, Gentoo  
Maureen Connolly, CEO, Birmingham Solihull Women's Aid  
Sarah Hill, CEO, IDAS (Independent Domestic Abuse Services)  
Rahila Gupta, Interim Director, Southall Black Sisters



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