

Southern Housing Response to House of Lords Select Committee Inquiry on the Domestic Abuse Act 2021

About Us

Southern Housing is one of the largest housing associations in the UK with more than 80,000 homes across London, the South East, the Isle of Wight and the Midlands, giving over 167,000 people somewhere affordable to call their own. As a not-for-profit social landlord with charitable status, we reinvest every penny we receive from rent, service charges and sales into delivering services to our residents, maintaining our existing homes and building new ones. Our vision is to create communities where everyone has a safe home in a place where they're proud to live. We're responding because housing providers are a critical but under recognised part of the safeguarding system. Recognising and integrating social housing more fully into domestic abuse responses would materially improve safety, stability, and recovery for survivors and their children.

1. Children as victims of domestic abuse

As a social landlord, our tenants are adults aged 18 and over; however, many are parents or carers. The homes we provide are where children live, experience domestic abuse, and attempt to recover. While we do not work directly with children, we regularly engage with external agencies that do, including children's social care, police, health services, education providers, and domestic abuse specialists. Our comments are therefore based on multi agency practice rather than direct children's service delivery.

Effectiveness and sufficiency of recognition

The Domestic Abuse Act 2021's recognition of children as victims in their own right is a significant and welcome development. From our experience, this has improved professional awareness that domestic abuse causes direct emotional, psychological, and developmental harm to children, rather than framing them solely as witnesses.

However, this recognition has not yet translated consistently into early, coordinated, or preventative support for children. Intervention often remains reactive, with agencies becoming fully engaged only once risk escalates significantly. The provision is therefore important, but not yet sufficient in practice.

Impact on children's services

Children's services demonstrate reasonable commitment to the principles of the Act, but delivery is constrained by:

- Rising demand and limited capacity
- High thresholds for intervention
- Fragmented responses across agencies.

Support for children affected by domestic abuse is often episodic rather than continuous, particularly where families are rehoused into temporary or emergency accommodation for long periods.

Coherence across agencies

There is inconsistent recognition of children as victims across courts, local authorities, service providers and statutory agencies. Importantly, social housing providers are rarely treated as key safeguarding partners, despite housing stability being central to children's safety and wellbeing.

This lack of inclusion weakens information sharing, risk management, and long-term planning for children.

Resourcing and funding

Resourcing has not matched the intent of the Act. Agencies working with children affected by domestic abuse remain under significant pressure, limiting early intervention, follow up, and multi agency coordination.

2. Statutory definition of domestic abuse

Usefulness of the definition

The statutory definition has been broadly helpful in promoting a shared language across agencies. It supports a broader understanding of abuse beyond physical violence and assists practitioners when identifying risk.

Coverage of different forms of abuse

The Act appropriately recognises many non-physical forms of abuse, including coercive control, financial abuse and non-fatal strangulation. However, in practice:

- Tech abuse, spiritual abuse, and honour-based abuse are inconsistently understood
- Abuse perpetrated by family members other than partners is often overlooked or misunderstood.

This lack of understanding sometimes results in local authorities disputing statutory duties where the perpetrator is not a current or former intimate partner.

Age limit

We consider the age limit appropriate; however, stronger links are needed between domestic abuse frameworks and youth safeguarding where abuse impacts older teenagers within family settings.

3. Local authorities, statutory bodies and agencies, and multi-agency working

Provision of safe accommodation

Local authorities face severe challenges in meeting their statutory duty to provide safe accommodation due to the national housing crisis. This results in:

- Extended stays in refuge or temporary accommodation (often 2–3 years+)
- Children experiencing prolonged instability.

Monitoring and audit arrangements vary significantly between areas.

Multi agency collaboration

Collaboration exists but is often fragmented. Processes would benefit from:

- Earlier multi agency engagement
- Stronger inclusion of housing associations as partners
- Improved information sharing

Housing associations are frequently expected to rehouse domestic abuse survivors, despite not holding the statutory duty or access to emergency accommodation.

Regional disparities

There are clear postcode-based disparities, especially in:

- Housing banding policies
- Access to refuge and temporary accommodation
- Thresholds for statutory support.

Risk assessment approaches

Risk assessments are not consistently applied across agencies. Housing associations often lack access to free training on completing Domestic Abuse, Stalking and Harassment (DASH) assessments, despite being regularly involved in cases.

Resourcing and training

Training across statutory bodies is inconsistent. We would welcome:

- Free, accessible DA training for non-statutory housing providers
- Clearer guidance on statutory vs non-statutory responsibilities
- Improved understanding of domestic abuse where perpetrators are family members

Good Practice

Based on our operational experience on the use of property hardening measures, overall, we have found this to be a positive, effective, and supportive intervention for victim survivors and their children who wish to remain safely in their own homes. Where implemented quickly and in a way that is tailored to individual circumstances, these measures can reduce risk, increase feelings of safety, and help maintain

stability for households that may otherwise face further trauma through displacement.

In our experience, the most effective property hardening interventions are those that are individualised to the resident's needs, informed by risk assessment, and delivered promptly. When combined with wider safeguarding arrangements and multi agency oversight, such measures can offer meaningful reassurance and practical protection.

We have also observed that property hardening can be particularly beneficial for children, disabled victim survivors, and households with complex needs, where remaining in familiar surroundings can support wellbeing, education, and access to existing support networks. For some residents, relocation is not always the safest or most appropriate immediate option, and property hardening provides a viable alternative where risk can be suitably managed.

Reduction in delays to applying hardening measures can seek to provide early assurances to survivors and families wishing to remain in their home. Good practice includes the use of county-wide consent protocols where multiple landlords operate, removing the need for individual landlord consent.

Visibility and timely information sharing is key to supporting DA survivors. Digital initiatives such as OASIS currently being rolled out in Kent to support Multi-Agency Risk Assessment Conferences (MARAC) is showing encouraging signs in bringing together key agencies and developing action plans.

4. The office of the Domestic Abuse Commissioner

The Domestic Abuse Commissioner has played an important leadership and advocacy role, particularly in raising awareness of systemic gaps. However, limited enforcement powers and reliance on other bodies to act on recommendations may constrain effectiveness.

5. Policing and courts

The Act has improved recognition of domestic abuse within policing, but outcomes for victims remain inconsistent. We observe:

- Survivors hesitant to engage due to fear of housing/children's social services consequences
- Limited feedback loops between police and housing providers.

DAPOs and DAPNs

These have potential but appear inconsistently applied. Enforcement of positive requirements remains unclear at local level.

Court processes

Special measures are helpful where applied, but access varies. Training for court practitioners appears inconsistent.

6. Community service providers

Community providers remain vital but face:

- Short term funding cycles
- Challenging procurement processes
- Capacity limitations.

Information sharing between providers and statutory agencies is inconsistent, limiting holistic support.

7. Prevention

Public awareness

Public awareness of domestic abuse is relatively strong. However, children are not consistently educated about abusive behaviours. We believe:

- Education on healthy relationships and abuse should form part of the national school curriculum
- Content could align with relationships and sex education.

Perpetrator programmes

We are unclear whether perpetrators involved in cases we support are being offered or encouraged to engage with DVPPs/DAPPs. Greater transparency and consistent referral would be beneficial.

We also recognise that:

- Removing perpetrators without alternative accommodation can increase risk
- Perpetrators often relocate to family members' homes, exposing new victims.

8. Inclusion

While the Act aims to be inclusive, implementation gaps remain for:

- Minority ethnic victims
- Migrant victims with NRPF
- Disabled victims
- Male victims
- LGBT+ victims.

Barriers include access to housing, language support, eligibility criteria, and cultural understanding.

9. External developments

We have not conducted a comparative legal analysis but note that:

- Subsequent legislation and strategies have not fully resolved housing or enforcement gaps

- The Violence Against Women and Girls strategy may strengthen prevention but will require sustained funding.

10. Gaps

Key gaps identified through our experience include:

- Lack of clarity on housing responsibilities between local authorities and housing associations
- Inconsistent housing banding for domestic abuse survivors
- Inadequate protection from prolonged stays in temporary accommodation
- Insufficient training access for non-statutory agencies
- Limited mechanisms to support neighbours reporting suspected domestic abuse where victims do not disclose.

We frequently receive reports of domestic abuse framed as anti-social behaviour by neighbours. Without victim disclosure, housing associations have limited powers and can only advise contacting the police.

Closing statement

The Domestic Abuse Act 2021 provides a strong legislative foundation. However, housing insecurity, inconsistent local authority practice, and limited multi agency cohesion significantly diminish its effectiveness, particularly for children.

Housing providers are a critical but under recognised part of the safeguarding system. Recognising and integrating social housing more fully into domestic abuse responses would materially improve safety, stability, and recovery for survivors and their children.