

<b>Committees:</b> Homelessness and Rough Sleeping Sub-Committee – For Information Department of Community and Children’s Services – For Information	<b>Dated:</b>  04/10/2023  01/11/2023
<b>Subject:</b> City of London’s Women Project Access Criteria	<b>Public</b>
<b>Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?</b>	1,2,3,4,10
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>N</b>
<b>If so, how much?</b>	<b>N/A</b>
<b>What is the source of Funding?</b>	<b>N/A</b>
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	<b>N/A</b>
<b>Report of:</b> Judith Finlay, Director of Community and Children’s Services	<b>For Information</b>
<b>Report author:</b> Fleur Holley-Moore, Rough Sleeping Services Manager	

### Summary

This report aims to provide supplementary information on the access criteria of the City of London’s Women Project and how it ensures that the City of London is meeting its obligations under the Domestic Abuse Act (2021) and the Equality Act (2010). The City of London’s Women Project was launched in April 2023, marking the City of London’s first dedicated accommodation service for single women who are experiencing homelessness and fleeing domestic abuse. This report outlines the access criteria and the measures in place to minimise risk as far as reasonably possible for women accommodated within the project.

### Recommendation

Members are asked to:

- Note the report.

### Main Report

#### Background

1. The report *City of London’s Women Project Update* was brought to the Department of Community and Children’s Services Committee and Homelessness and Rough Sleeping Sub-Committee in July 2023.
2. The paper provided a background on the City of London’s Women Project and why it was required to meet City of London’s (CoL’s) legal obligations under

the Domestic Abuse Act (2021) and moral responsibilities towards women who are homeless and fleeing domestic abuse.

3. The paper also explained how the project supports CoL's Violence Against Women and Girls Strategy 2019-2023,<sup>1</sup> that outlines its priorities for dealing with violence against women and girls through services across the Square Mile.
4. Members requested that a supplementary paper be provided to offer additional information on the access criteria of the project and how the safety of the women placed there is ensured, while also ensuring that the CoL is meeting its statutory responsibilities under the Housing Act (1996), the Domestic Abuse Act (2021) and the Equality Act (2010). Members also requested additional information on demand for the project, and outcomes to date.

### **Domestic Abuse Act (2021)**

5. The Domestic Abuse Act (2021) changed homelessness legislation to include those fleeing domestic abuse as automatically in priority need for assistance under the Housing Act (1996).
6. This means that, if the local authority is satisfied that an applicant is eligible for assistance and is homeless because of domestic abuse, the local authority must offer safe temporary accommodation for the duration of their application without needing to meet other qualifying factors.
7. The Act created a new requirement that temporary accommodation for those fleeing domestic abuse must be safe, and CoL saw this as an opportunity to move away from its reliance on mixed-sex accommodation provision and develop a new approach for this group.
8. In response, the City of London's Women Project was established as a women-only temporary accommodation initiative to better address the needs of women fleeing domestic abuse and fulfil legal duties under the Domestic Abuse Act (2021).

### **Demand Data**

9. The City of London experienced an increase in homelessness approaches from households fleeing domestic abuse after the enactment of the Domestic Abuse Act (2021).

---

<sup>1</sup> [City of London Violence Against Women and Girls Strategy 2019-2023](#)

**Table 1 – Number of approaches from households fleeing domestic abuse**

Year	Number of approaches	Percentage increase vs previous year
2018/19	5	N/A
2019/20	3	-40%
2020/21	26	77%
2021/22	31	19%
2022/23	53	71%

10. Overall, from 2018/19 to 2022/23, the CoL saw a 960% increase in approaches due to domestic abuse.
11. Figures for England demonstrate a 53% increase in a homeless duty acceptance due to domestic abuse from 2018/19 to 2021/22 (please note annual figures for 2022/23 are not yet published).
12. In the year 2022/23, a total of 49 women slept rough in the Square Mile for one or more nights. While data from the Combined Homelessness and Information Network (CHAIN) under-reports those rough sleeping due to fleeing domestic abuse, data from a nationwide homeless charity suggests that domestic abuse contributes to a third of cases involving women who sleep rough.<sup>2</sup>
13. This increase can be partially attributed to the national lockdown in response to COVID-19. During this period “police recorded crime data show an increase in offences flagged as domestic abuse-relation”, “an increase in demand for domestic abuse victim services” and “London’s Metropolitan police services received an increased number of calls-for service for domestic incidents”.<sup>3</sup> This, too, would have resulted in an increase in the number of households approaching CoL and local authorities across England because of fleeing domestic abuse.

### **Access Criteria**

14. The access criteria for the City of London’s Women Project has been developed based on the Housing Act (1996), Equality Act (2010), Domestic Abuse Act (2021) and best practice research.
15. The project is for women, (including those who identify as a woman), with a connection to CoL who are homeless, require safe accommodation and for whom domestic abuse is an aggravating factor in their homelessness.
16. The project, and access criteria, have been established in light of potential proposals to reform the Gender Recognition Act (2004)

---

<sup>2</sup> [New research reveals women experiencing homelessness are often hidden from help - St Mungo's \(mungos.org\)](https://www.stmungos.org/news/new-research-reveals-women-experiencing-homelessness-are-often-hidden-from-help)

<sup>3</sup> [Domestic abuse during the coronavirus \(COVID-19\) pandemic, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/news-and-comment/news-releases/2020/04/2020-04-23-domestic-abuse-during-the-coronavirus-covid-19-pandemic-england-and-wales)

17. Clients must be 18 years old or older.
18. They must be single, or it must be that their children or partner do not reside with them.
19. They must be eligible for homelessness assistance and have access to public funds.
20. They must have low- or medium-level support needs and be able to sustain temporary accommodation with floating support.
21. They must not have a violent criminal conviction, caution or warning.
22. They must either have a history of rough sleeping recoded in the Square Mile on CHAIN or have sought homeless assistance from the CoL under Part VII of the Housing Act (1996).
23. The Equality Act (2010) stipulates that the exclusion of an individual because of a protected characteristic, for example, because they have started or completed gender reassignment, can only be in circumstances when it can be demonstrated that such exclusion constitutes a proportionate means of achieving a legitimate aim.
24. Under this clause, a single-sex service such as the City of London's Women Project can only exclude men from accessing the service. Additionally, as there is insufficient demand, CoL are not required to provide a parallel service for men.
25. Therefore, apart from the exceptions mentioned above, exclusion from the service is determined by assessing the potential risk that a placement into the project might pose to others within the service, or the risk that existing residents might pose to the new individual, rather than an arbitrary exclusion of a protected characteristic.
26. This access criteria is in line with the 15 umbrella bodies and local domestic and sexual violence support services across Britain that were interviewed for Stonewall's resource *Supporting trans women in domestic and sexual violence services; Interviews with professionals in the sector*. Among other findings, it found that "no participants said they have used the Equality Act exemption to deny support to a trans survivor. Some participants said that the exemption should be kept as a safeguard, while others were concerned about other services using the exemption to turn away trans survivors when they should be providing support" and "participants take a personalised, client-centred approach to supporting trans women, as they do for all survivors".<sup>4</sup>

---

<sup>4</sup> Stonewall, Supporting trans women in domestic and sexual violence services. [stonewall\\_and\\_nfpsynergy\\_report.pdf](#)

## Keeping Women Safe in the City of London's Women Project

27. The Project is for all women who meet the access criteria and do not pose a threat to the existing residents, thereby prioritising safety for both newcomers and those already part of the programme.
28. To minimise risk as much as possible for the women placed in the project, a range of safety measures have been implemented, both concerning the project itself and the assessment and sign-up process. This includes a client centred risk assessment procedure.
29. Through its research<sup>5</sup>, Stonewall observed that “while respondents were aware that gender recognition reform could allow violent men to pose as women to access their service...there was a clear consensus that services’ thorough risk assessment procedures would safeguard against (harm)”.
30. The project does not have direct access; referrals must undergo a thorough assessment by a CoL Advice and Homeless Officer or by a City Outreach Worker before being presented to a panel for acceptance.
31. The panel convenes as needed and includes CoL employees as well as representatives from commissioned services, ensuring a comprehensive assessment of the referral.
32. A referral will be declined by the panel if the individual fails to meet the access criteria and/or if they present a risk to others within the service, or if existing residents may pose a risk to them.
33. A comprehensive sign-up process is in place, including CoL’s Temporary Accommodation Agreement and a Behaviour Contract. This ensures that accepted referrals understand their responsibilities during their time in the project, and that it is a safe, inclusive space. In the event of a breach of the Temporary Accommodation Agreement or Behaviour Contract, the woman’s bedspace in the project may be brought to an end.
34. A female Mobile Intervention and Support Worker attends the project regularly to provide support for the women and to ensure adherence to the Temporary Accommodation Agreement and the Behaviour Contract.
35. The temporary accommodation provider of the City of London’s Women Project has also installed CCTV that can be accessed and shared when necessary.
36. If a woman, or someone identifying as female, is deemed unsuitable for the project at panel or after placement, alternative suitable temporary accommodation will be arranged. This may include a placement in CoL Supported Accommodation Pathway, self-contained Temporary Accommodation, or a more specialised options, such as a refuge.

---

<sup>5</sup> Stonewall, Supporting trans women in domestic and sexual violence services.  
[stonewall\\_and\\_nfpsynergy\\_report.pdf](#)

## **Outcomes to Date**

37. To date, we have had seven placements in the City of London's Women Project.
38. Six of these placements have been made by the Statutory Homeless Team and one by the Rough Sleeping Team.
39. Four women have moved on from the project: one was reconnected to their home area; two moved into CoL social housing stock; and one moved on to a privately rented flat.
40. We currently have two women on the waitlist.

## **Options**

41. There are no additional options arising from this report.

## **Proposals**

42. There are no proposals arising from this report.

## **Key Data**

43. There is no key data arising from this report.

## **Corporate & Strategic Implications**

44. Financial implications – N/A
45. Resource implications – N/A
46. Legal implications – N/A
47. Risk implications – N/A
48. Equalities implications – Under the Equality Act (2010) providers cannot discriminate against someone based on a protected characteristic. However, there are exceptions where access for certain groups can be modified or limited when it represents a "proportionate means of achieving a legitimate aim". Under this exception, men are excluded from accessing the CoL's Women's Hub, as it is a safe space for women fleeing domestic. A full Equality Analysis has been completed.
49. Climate implications – N/A
50. Security implications – N/A

## **Conclusion**

51. The City of London's Women Project is for all women who meet the access criteria and who do not present a risk to the current residents, ensuring safety for newcomers and those already within the service.
52. Legislative changes under the Domestic Abuse Act (2021) accentuated the need for the project, alongside the increase in demand from approaches to CoL from women fleeing domestic abuse and the ongoing need from women sleeping rough in the Square Mile.
53. The access criteria, which was developed with careful consideration, ensures that the project caters to the needs of single women fleeing domestic abuse, and has a robust assessment mechanism to ensure a safe environment.
54. The project's compliance with the Equality Act (2010) demonstrates its dedication to maintaining an inclusive and protective space, and the safety measures in place for the project play a pivotal role in ensuring the women's safety while at the project.

## **Appendices**

- None

## **Background Papers**

- City of London's Women Project Update, July 2023

## **Fleur Holley-Moore**

Rough Sleeping Services Manager  
Department of Community and Children's Services

T: 07912041596

E: Fleur.Holley-Moore@cityoflondon.gov.uk