



Federation Northern Ireland

Committee for Social Development

A written submission in response to: The Welfare Reform Bill

19 October 2012

Women's Aid Federation Northern Ireland

129 University Street
BELFAST BT7 1HP

Tel: 028 9024 9041

General Email: info@womensaidni.org

Website: www.womensaidni.org

24 Hour Domestic Violence Helpline - 0800 917 1414

Email support: 24hrsupport@dvhelpline.org

Text SUPPORT to 07797 805 839

Open to all women and men affected by domestic violence

Contents

Section		Page
1	Introduction	3
2	Core work of Women's Aid	3
3	Women's Aid statistics (2011-2012)	3
4	Additional Women's Aid statistical data	4
5	Statistics: Domestic violence and violence against women	4
6	Domestic violence: Crime statistics	4
7	Response	5
7.1	General comments	5
7.2	Universal Credit	7
7.3	Housing Benefit	9
7.4	Flexibility of payments	11
8	Conclusion	12
9	Contact details	13

1.0 Introduction

Women's Aid is the lead voluntary organisation in Northern Ireland addressing domestic and sexual violence and providing services for women and children. We recognise domestic violence as one form of violence against women. Women's Aid seeks to challenge attitudes and beliefs that perpetuate domestic and sexual violence and, through our work, promote healthy and non-abusive relationships.

2.0 Core work of Women's Aid

The core work of Women's Aid in Northern Ireland, including Women's Aid Federation Northern Ireland and the 10 local Women's Aid groups is:

- To provide refuge accommodation to women and their children suffering mental, physical or sexual abuse within the home.
- To run the 24 Hour Domestic Violence Helpline.
- To provide a range of support services to enable women who are leaving a violent situation to rebuild their lives and the lives of their children.
- To provide a range of support services to children and young people who have experienced domestic violence.
- To run preventative education programmes in schools and other settings.
- To educate and inform the public, media, police, courts, social services and other agencies of the impact and effects of domestic violence.
- To advise and support all relevant agencies in the development of domestic violence policies, protocols and service delivery.
- To work in partnership with all relevant agencies to ensure a joined up response to domestic violence.

3.0 Women's Aid statistics (2011 - 2012)

- 12 refuges with 300 bed spaces, playrooms and facilities.
- 831 women and 586 children sought refuge.
- 15 resource centres for women seeking information and support; group work and training.
- 3,663 women and 4,152 children accessed the Floating Support service enabling women to access support whilst remaining in their own homes and communities.
- Move-on houses for women and children leaving refuges.
- In 2011/12 the 24 Hour Domestic Violence Helpline, open to women and men affected by domestic violence, managed 43,949 calls. This represented an increase of 14.5% on 2009/10.

4.0 Additional Women's Aid statistical data

- Since 1999, Women's Aid across Northern Ireland gave refuge to 15,545 women and 14,942 children and young people.
- During the last 17 years Women's Aid Federation Northern Ireland managed 326,809 calls to the 24 Hour Domestic Violence Helpline.

5.0 Statistics: Domestic violence & violence against women

- Domestic violence is a violation of Article 5 of the UN Universal Declaration of Human Rights – that “no one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment”;
- The joint DoJ, DHSSPS Strategy “Tackling Violence at Home” estimates that the cost of domestic violence in Northern Ireland, including the potential loss of economic output, could amount to £180 million each year.
- UNICEF research released in 2006, showing per capita incidence, indicates that there are up to 32,000 children and young people living with domestic violence in Northern Ireland.
- Over 30% of all domestic violence starts during pregnancy.

6.0 Domestic violence: crime statistics

- Domestic Violence is a crime. PSNI statistics for 2011/12 indicate that there were more recorded crimes with a domestic motivation (10,387) than the combined total of all the following crimes (10,327) – all recorded sexual offences (1,836), shoplifting (6,201) and theft of a motor vehicle (2,290).
- PSNI Statistics for 2011/12 indicate that they responded to a domestic incident every 21 minutes of every day of the year.
- The total of 10,387 crimes with a domestic motivation in 11/12 represents an average of approximately 1 domestic crime every 51 minutes in Northern Ireland.
- The number of all recorded offences of murder in Northern Ireland in 11/12 total 16. Those classed as having a domestic motivation

total 3. Therefore, 19% of all murders in Northern Ireland in 11/12 had a domestic motivation.

- There were 553 rapes (including attempted Rapes) in Northern Ireland in the period 2011/12.

(Source: PSNI Statistics 2011/12)

- Official sources (NISOSMC) estimate that up to 80% of sex crimes are not reported.
- Violence against Women is not limited to domestic violence, it includes amongst other crimes murder, rape, sexual assault, sexual exploitation, trafficking, sexual stalking and sexual harassment.

7.0. Response

Women's Aid Federation Northern Ireland welcomes the opportunity to respond to the proposed Welfare Reform Bill on behalf of our ten local groups, who have been consulted with for the purpose of this response. We understand that the Welfare Reform Bill was formally introduced to the Northern Ireland Assembly on 1st October 2012 and received its second reading on 9th October 2012. We are aware that the Bill has been referred to the Committee for Social Development for Committee Stage.

7.1 General comments and concerns

- We have serious concerns relating to the potentially devastating consequences the proposed Welfare Reform Bill will have on women and as direct result, their children and families.
- We view the proposed Bill as a major step backwards in relation to women's rights and gender parity. In its current format, the Bill negates the positive progress we have witnessed in these areas over the past decades with EU, UK and NI gender equality strategies.
- We would like to draw attention to a recently published report by the Women's Resource and Development Agency entitled "The Northern Ireland Economy: Women on the Edge"¹ This report effectively examines women's current economic position, economic participation and the impact of the current economic crisis upon their lives. It provides a robust evidence base on women's position in terms of economy, employment, childcare, pensions, welfare, debt and credit, housing, fuel and fuel debt. The report includes a

¹ Hinds, B (July 2011) The Northern Ireland Economy: Women on the Edge? WRDA: Belfast

comprehensive chapter on Welfare and Welfare Reform. Overall the report paints a bleak picture for the position of women in the current economic climate and in particular, highlights the potential damage of proposed changes to welfare reform.

- We would also like to highlight recent reports of increasing child poverty in Northern Ireland. Statistics highlight 60% of low income families cutting back on food, 29% skipping meals, and 31% saying that they 'have nothing left to cut back on' (Child Poverty in 2012, Save The Children).
- Welfare and emergency support is crucial in helping victims of domestic and sexual violence leave their abusive home situation and ensure the safety of themselves and their children. Such support ensures that victims have the option to extricate themselves from a domestic violence situation in the knowledge that it will not lead to destitution.
- In most cases, women who leave their abusers are faced with poverty and, in the case of victims who have children, the additional challenges associated with being a single parent.
- We would like to preface our specific concerns by emphasising the impact of the current economic environment for women and children who have been and/or are still living with domestic violence. Reduced financial circumstances resulting from the economic downturn can prevent a woman from leaving an abusive situation. Fear of impoverishment is very real as is the fear of losing their children as a consequence. Others feel trapped by the fear of losing their home, being placed in negative equity or being unable to sell their property.
- Since the economic downtown, we have witnessed levels of poverty among women using our services that are shocking. Examples have included women approaching charitable organisations for donations of food, clothing, furniture etc. and women having to overlook their own basic needs in order to provide food and clothing for their children.
- Additionally we are deeply concerned that women, who have experienced domestic violence, are reporting significant difficulties in accessing entitlements in Northern Ireland. Women accessing our services often have no money or income and are often denied access to their own money by violent partners. Without financial and practical help to rebuild their lives and the lives of their children, they are left destitute at a very vulnerable time. Problems include lengthy delays for women who are making their first claim,

eligibility for crisis loans, problems with the assessment of Employment and Support Allowance (ESA), Disability Living Allowance (DLA) and Community Care Grants, and difficulties in obtaining Child Benefit Payments.

- Women's Aid is concerned that the proposed changes to the welfare system will have a negative impact both on the work of our organisation and on many of the women who use our services. We feel, the Bill, in its current format is discriminatory and represents an extremely grim future for women and children experiencing domestic violence in Northern Ireland. Our concerns are now outlined and relate specifically to Universal Credit, Housing Benefit and flexibility of payments.

7.2 Universal credit

Our concerns

- In relation to Universal Credit, Women's Aid has serious concerns relating to the proposed process for payment of Universal Credit to one member of the household who is declared as the "main applicant". It is estimated that in 80% of cases, it will be paid to the male in the household.
- While we understand the purpose of this approach is to simulate a wage/salary coming in to the household, it does not take into consideration families where there are two earners or families where there is a main earner while another receives child benefit or tax credits. It also makes the huge assumption that money is shared equally within all households and fails to recognise that finances are frequently used as a means of power and control in abusive relationships.
- This is a huge step backwards in terms of gender equality and we are seriously concerned that this will deprive a woman of tax benefits, including tax credits paid to her as a mother. As a result, women will have less control over household income, less ability to budget effectively, less autonomy to manage housekeeping and less ability to care for children's needs. Not only do we believe the proposed changes are a step backwards in relation to gender equality, we also believe they represent a violation of children's rights as outlined in the UNCRC and are certainly not in the best interests of the child.
- This proposed process for payment of Universal Credit creates a greater potential for economic abuse within a household.
- We would like to express the particular concerns we have in relation to women and children who are experiencing or escaping from domestic violence. Financial abuse is a frequent characteristic of domestic violence.

Over a history of 37 years of service provision to women and children experiencing domestic and sexual violence, Women's Aid has witnessed endless examples of such abuse. These have included perpetrators preventing their partners from working, accumulating debt in their partner's name, preventing their partners from pursuing education or personal development opportunities and excessive control and management of the household and personal finances.

- We are extremely concerned that the proposal for payment of Universal Credit to one person has the potential to create tension, exacerbate situations of financial abuse, therefore putting women and children at greater risk.
- Women's Aid joins with WRDA in raising the very real concern that Universal Credit will serve as a disincentive to the second earner in a family. The second earner again is usually the woman in a household. We are concerned this represents a regression in women's economic and labour market equality and positions women firmly as part-time and low-paid workers, earning pin money to subsidise the main earner (the man) or to stay at home and take up the role of unpaid carer. This severely limits women's choices and positions them clearly as economic dependants. This is also compounded by a lack of childcare provision currently and the lack of regional childcare strategy.
- Women's Aid shares the belief of WRDA that it is unacceptable that government policy in the 21st Century should have such a regressive impact on the lives of women.

Recommendations

- Women's Aid urgently calls for an immediate reconsideration of arrangements for payment of Universal Credit.
- Women's Aid, along with other representatives from the women's sector, have been advocating that Universal Credit be paid to second earner or adult with the main caring responsibilities (women in most cases), to ensure that both partners have personal access to finances and that there is a positive knock on effect on children. We therefore recommend payment to the "main carer" or "second earner" or to split payments between joint claimants.
- Women's Aid strongly recommends a structured process of consultation with gender experts and providers of temporary accommodation such as Women's Aid to explore the possible damage such proposed changes could have and to examine alternative options.

7.3 Housing Benefit

Our concerns

- Women's Aid anticipates several problems arising from the rolling of Housing Benefit into Universal Credit. We see this as a huge and potentially devastating step and one which we feel should not be taken without in depth consultation with gender experts and providers of temporary accommodation such as Women's Aid. We believe this move will lead to women falling into debt, becoming homeless or being forced to take unsafe steps to improve their situation.
- We have serious concerns about the potentially devastating consequences this proposed change will have upon the provision of life saving emergency temporary accommodation (refuge) for women and children fleeing domestic and sexual violence in Northern Ireland. Women's Aid currently provides 12 refuges across Northern Ireland. These provide safe temporary accommodation for women and children who have experienced domestic and sexual violence in their homes. Since 1999, Women's Aid across Northern Ireland gave refuge to 15,545 women and 14,942 children and young people. Women and children come to refuge with a range of individual support needs. The length of stay will vary depending upon needs and circumstances and can range from short stays while a woman considers her options to lengthy stays exceeding one year, while she waits to be re-housed.
- We question whether the housing benefit element of Universal Credit will be paid to the male if his name is not on the tenancy? If this is the case and he does not pay the rent, will the debt then be attributed to the woman who does hold the tenancy? Also if there is a joint tenancy and the male who is the main applicant and in receipt of Universal Credit does not pay the rent, does half of the remaining debt stay with the woman?
- The situations that could arise from this arrangement are complex and the repercussions need to be clearly thought through in consultation with experts in the area such as Women's Aid. There is a definite need to reconsider this proposed approach if we are to avoid homelessness for women and children generally and in particular, those experiencing domestic and sexual violence.
- If a woman escapes domestic violence and comes to a Women's Aid refuge for safety and support, housing arrears can follow her. As a direct consequence, the problem is then being passed onto Women's Aid as the temporary housing provider. This is an historical pattern and a situation that a woman unfortunately has no control over.
- The accrual of debt can have serious repercussions for payment of housing benefits to temporary accommodation providers such as Women's Aid.

Women's Aid is totally reliant on Housing Benefit to cover the costs of women and children accessing refuge accommodation. Without rents and service charges being met in full, the provision of refuge accommodation would no longer be viable. Women's Aid across Northern Ireland is already working within reduced budgets and insecure funding streams. We are not in a position to support multiple women without Housing Benefit in the long term. This proposed approach for payment of Housing Benefit has the potential to reduce substantially the crucial funding that provides a safe place for women and children who are escaping from domestic and sexual violence in Northern Ireland.

- We are also concerned about the shared room rate applying up to 35 years. There are issues of privacy and confidentiality which need to be respected in refuge accommodation. Above all women need to be treated with respect and dignity during what, for them is a difficult and often painful time. Personal information must be kept confidential and this can be increasingly difficult where accommodation is shared. Complications also arise where a woman is not the custodial parent as shared rooms are not suitable for bringing children for day visits or overnight stays. Conflict may also arise with the primary care parent or with the perpetrator of domestic violence over the suitability of shared accommodation for children and young people. Such issues compound women's fears in relation to leaving an abusive situation and in many cases are primary drivers for her to return to an unsafe situation.
- Finally, in situations of domestic and sexual violence where the woman and children have fled the home and the abuser remains, there may be circumstances where the house is declared under-occupied. We are concerned that women who leave will be at higher risk as a direct result. This will reduce the Housing Benefit paid to the partner, we are concerned this financial hit will be used as another reason to abuse, threaten and cajole the woman who has left.

Recommendations

- Women's Aid strongly urges consideration of the serious repercussions of accrued debt on temporary accommodation providers such as Women's Aid.
- We seek clarification on whom the debt will remain with and strongly recommend the inclusion of a clause which states that housing arrears remain with the person who receives payment of Universal Credit.
- We reiterate that Universal Credit should be paid to the second earner or main carer.
- We request that a block grant for Housing Benefit should be paid annually to refuge providers to cover occupancy. As a minimum, the Housing Benefit

element of Universal Credit should continue to be paid on an individual basis but directly to landlords, including refuge providers.

- Finally, we strongly recommend a structured process of consultation with gender experts and providers of temporary accommodation such as Women's Aid to explore the possible damage such proposed changes could have and to examine alternative options.

7.4 Flexibility of payments

Our concerns

- Women's Aid has serious concerns in relation to the proposed monthly payment of Universal Credit. We feel the rationale for this i.e. to learn to budget for monthly wages, is not based upon a real understanding of the needs of low income families.
- Those families who are on low income pay are generally paid weekly or fortnightly. Even with this women still find it difficult to manage, many reporting dependence on weekly child tax credits to "see them through".
- A month between payments is too long for such families and we anticipate a range of problems for low income families including, difficulties in making ends meet, running out of money towards the end of the month, turning to other methods of finance for survival such as high interest loans or simply surviving on less in the latter part of the month. It can also place a family in a position where they cannot deal with unexpected or crisis situations.
- Such problems can exacerbate and lead to overarching problems such as poor health, child poverty and an ever increasing spiral of debt.
- Rather than promoting effective budgeting, we strongly believe a move towards monthly payments could actually increase budgeting problems with serious consequences.

Recommendations

- Women's Aid strongly recommends a reconsideration of the proposed payment timescale.
- We believe people should not be forced to move to monthly payments. Payments could be changed to weekly or fortnightly or at the very least, families should be given a choice.

- We strongly recommend a structured process of consultation with gender experts and providers of temporary accommodation such as Women's Aid to explore the possible damage such proposed changes could have and to examine alternative options.

8. Conclusion

Women's Aid appreciates the opportunity to raise our concerns in relation to the proposed Welfare Reform Bill. Once again we would like to reiterate our belief that it represents a huge step backwards in relation to gender equality and completely negates the positive developments we have witnessed over the past years. In truth, we feel it represents a poor deal for women, particularly those who are experiencing or escaping from domestic and sexual violence.

Achieving gender parity is accepted internationally as an indicator of well-being as well as a true and genuine demonstration of women's rights. These proposed welfare reform changes undermine EU, UK and NI gender equality strategies. The UK government has ratified the International Covenant on Economic, Social and Cultural Rights, and as such has committed to ensure that people in the UK have an adequate standard of living, including food, clothing and housing, and the continuous improvement of living conditions (Article 11). Therefore it is extremely alarming that this Welfare Reform Bill does not commit to guaranteeing these basic human rights, or adopting a human rights-based approach with the right to human dignity as its basis.

9. Contact details

For further information about this response please contact:

Annie Campbell
Director
Women's Aid Federation Northern Ireland
129 University Street
BELFAST
BT7 1HP
Tel: 028 9024 9041

annie.campbell@womensaidni.org

Website: www.womensaidni.org

24 Hour Domestic Violence Helpline - 0800 917 1414

Email Support: 24hrsupport@dvhelpline.org

Text SUPPORT to 07797805839

Open to all women and men affected by domestic violence