

- Please provide a list of all meetings held with the Child Poverty Action Group (CPAG) on the topic of a leavers fund to support victims of domestic abuse to leave abusive relationships.

Dates of meetings with CPAG about the fund to leave

21/04/2022	Actions from meeting on 21/04/2022
18/08/2022	Actions from meeting on 18/08/2022
13/07/2023	No meeting note – email follow up

- Please provide all correspondence related to these meetings including the minutes of the meeting, any briefing notes provided to ministers related to these meetings, any notes or analysis produced before or after the meeting related to the establishment of a leavers fund for victims of domestic abuse, and any proposed timeline that may have been produced regarding the establishment of a leavers fund.

redacted–30(b)(i)	Section 30(b)(i) (free and frank provision of advice)
redacted–38(1)(b)	Section 38(1)(b) (personal information)
out of scope	Information is not in scope of original request

Documents for release in chronological order:

1	Email chain ending with CPAG with info – 20/04/2022
2	Actions from meeting on 21/04/2022
3	Email with case studies – 16/06/2022
4	Actions from meeting on 18/08/2022
5	Submission to Ministers – financial support to leave and abusive partner – 29/06/2023
6	Email with development paper – 13/07/2023
7	Email from CPAG on development paper – 28/07/2023
8	Email from CPAG with DHP info – 07/08/2023
9	Core Brief
10	Development paper – version 2

Email chaining ending with CPAG with info – 20/04/2022

From: redacted–38(1)(b)
Sent: 20 April 2022 10:56
To: redacted–38(1)(b) MacKean C (Catriona); redacted–38(1)(b)
Subject: Re: Financial support for women experiencing domestic abuse meeting 21st April 11am
Attachments: Financial support for women leaving domestic abuse briefing.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Hello

Please find briefing attached ahead of our meeting tomorrow.

Credit must go to **redacted-38(1)(b)** who drafted a report before leaving Engender. I just condensed it.

I look forward to meeting you all.

Best wishes

redacted-38(1)(b)

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redacted-38(1)(b)

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From: **redacted-38(1)(b)**

Sent: 14 April 2022 6:13 PM

To: **redacted-38(1)(b)** Catriona.MacKean@gov.scot <Catriona.MacKean@gov.scot>; **redacted-38(1)(b)**

Cc: **redacted-38(1)(b)**

Subject: RE: Financial support for women experiencing domestic abuse meeting 21st April 11am

Thank you for the introduction **redacted-38(1)(b)** and for including me in this group.

As you know, unfortunately **redacted-38(1)(b)** will be leaving Engender this week. So I will be stepping in in her place. I look forward to working with you all on this.

Warm wishes

redacted-38(1)(b)

redacted-38(1)(b)

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redacted-38(1)(b)

Engender is Scotland's feminist membership organisation. We work for women's economic, political and social equality with men. Scottish charity (SC029053) and company limited by guarantee (SC 286639).

From: redacted-38(1)(b)

Sent: 07 April 2022 15:59

To: Catriona.MacKean@gov.scot; redacted-38(1)(b)

Cc: redacted-38(1)(b)

Subject: Financial support for women experiencing domestic abuse meeting 21st April 11am

Hi Catriona

I hope you are well. I'm emailing to let you know that redacted-38(1)(b) from CPAG, will circulate a briefing ahead of our meeting on the 21st April to discuss the recommendation on financial support for women to leave an abusive partner. I'm making email introductions here with redacted-38(1)(b) and redacted-38(1)(b) from Engender so that hopefully all the relevant people are copied in!

Best wishes

redacted-38(1)(b)

Financial support for women leaving domestic abuse

CPAG in Scotland, Engender and Scottish Women's Aid: April 2022

The Scottish Government should explore options for a dedicated support fund, or entitlements with clear guidance and capable of delivering short-term recurring payments, to support women leaving an abusive partner.¹ This should include essential crisis costs to enable a woman to leave and to bridge the gap between leaving and the first Universal Credit payment.²

Why does there need to be dedicated support?

Women's poverty and men's violence against women are inherently and causally connected.

Women who come to social security from a place where they are experiencing abuse are in a particular set of circumstances where their previous economic resources may be "almost irrelevant" because they have been denied financial autonomy and agency, even if income or savings have been formally in their own name.³

Gaps in the social security system mean that people escaping domestic abuse are not guaranteed to have the financial means they need to survive. This can jeopardise their having a safe place to go and result in people returning to their abusive partners.

Our collective evidence highlights:

- Women claiming benefits in a couple are unable to make a new claim for benefit as a single person without alerting their partner

¹ Any payment/fund would have to be made available to all sexes, but the nature of domestic abuse means that the majority of payments would be made to women, hence the language used in this briefing.

² <https://womensaid.scot/wp-content/uploads/2020/12/Improving-Housing-Outcomes-for-Women-and-Children-Experiencing-Domestic-Abuse-Report.pdf>

³ <https://appguniversalcredit.org.uk/meetings/29-april-2021-domestic-abuse/>

- No financial support for deposits or rent in advance
- Minimum five week wait for the first payment of universal credit
- The two-child limit and benefit cap reduce awards of universal credit considerably
- Child benefit claims taking months to be transferred from one partner to another if there is a dispute about who should receive it.
- Women being refused or having to wait for grants from the Scottish Welfare Fund

In particular the five week wait for universal credit is a severe barrier for people escaping domestic abuse and that “it can be even lengthier for survivors who have escaped without ID and documentation, or who have no bank account due to economic abuse.”⁴

In practice five weeks is often the minimum wait, and represents five weeks from successful application. Perpetrators frequently withhold women and children’s documents or make false claims to frustrate the payment of benefits. There is also evidence of abuser’s incurring debt in joint names or in the victim’s name, including through advances of universal credit. These can delay and / or significantly reduce the value of the first and subsequent payment. Claimants are also often responsible for paying other deductions like council tax arrears or overpayments.

What is needed?

A new payment could bridge this existing gap in the social security system. A new payment should meet the following minimum objectives:

- Provide an income from the date of leaving until the first payment of universal credit (and Scottish child payment)
- Be capable of being applied for prospectively without alerting a partner.
- Not undermine the claimant’s privacy with other agencies or criminal justice bodies.
- Cover all children living with the claimant before and after separating from a partner.
- Meet immediate costs such as new accommodation, clothes replacement and food.
- Help a victim-survivor to prepare to leave their present home.
- Support adjustments to independence.
- Be compatible with payments to reflect additional costs and needs including for disabled women with higher livings costs.
- Include a recurring payment element to support adjustment period for a designated time period before income or income replacement is available.
- Include a grant element to cover one off / initial costs such as clothing, toys or furniture.

It is also imperative that the new fund can support migrant women. CPAG’s Early Warning System identifies migrant destitution as a consistent issue, including women who are EU nationals with pre-settled or no status and non-EU nationals with no recourse to public funds who plan to leave an abusive partner and realise that they will not be entitled to any social security support.⁵

Payment outcomes

As part of the primary goal, **in our view the payment should also seek to ensure that:**

- Women are given **immediate relief** from destitution and poverty when they leave their current home for a place of safety because of domestic abuse.

⁴ <https://www.womensaid.org.uk/wp-content/uploads/2021/01/Joint-Recommendations-on-the-Domestic-Abuse-Bill-4.docx>

⁵ <https://cpag.org.uk/sites/default/files/files/CPAG-Scot-EWS-domestic%20abuse-Oct18%20%282%29.pdf>

- Women are **given more time** to access integrated support to navigate the costs of a new life as ongoing needs are identified.
- Women have the **option to leave** more quickly with the confidence their initial needs will be met.
- As a result, **women are less likely to return** to an abusive partner.
- Women have **equal access** to the payment through multiple avenues that understand the needs of different groups.
- Women are **not required to navigate new risk and bureaucracy** and the payment is received quickly following an application.
- The payment should recognise that financial control does **not always end on separation**.

Options for delivery

A new entitlement managed by Social Security Scotland

Devolved social security powers could be used to create a standalone payment based on individual application and administered by Social Security Scotland.⁶

A new entitlement could be modelled on processes for payments such as the Funeral Support Payment, which allows for a standard flat rate to be paid as part of meeting funeral costs if a relative responsible for the cost of burial is receiving a qualifying benefit.⁷

A new payment would ensure uniformity and consistency, allowing for a single approach and standardised awards that could be increased with relative ease over time. Levels of payment could be standardised and ensure transparency and predictability through a centralised payment. A recurring option for periodic awards may also be easier to facilitate through a single national Agency.

However, a new social security entitlement might be less flexible than alternative approaches in terms of responding in a more tailored way to individual needs. There is a risk of bureaucracy slowing down the delivery of payments. Such an approach would also require negotiation with DWP about excluding the award of the entitlement from UC eligibility so that the benefits of the temporary award do not result in further hardship and delay to a UC award. Evidencing entitlement may also be more complex than a more discretionary fund.

A discretionary fund

A second option may be to create a specific discretionary fund to sit within or alongside the Scottish Welfare Fund (SWF) for people who are forced to leave their partner and / or home because of domestic abuse. This could sit alongside the continuing availability of crisis grants and community care grants, but provide a specific option for women to access ring-fenced funding via a trained administer. Existing statutory guidance already makes clear that “SWF advisors should be able to recognise and respond appropriately to domestic abuse, have developed good relationships and a referrals process to specialist domestic abuse services making links to Scottish Women’s Aid or other local provision.” However, a specific fund would ensure a ring-fenced volume that could be targeted without having to manage other resources.

This option may allow for more variable awards to meet individual circumstances. However, the more discretionary a system is the more opportunity there is for inconsistent decision making, discrimination and challenge. Local variations would need to be monitored. There is a need for certainty for women who are in a particularly dangerous moment, both in terms of risk of harm

⁶ For example, by virtue of Exception 10, under Head F, of schedule 5 of the Scotland Act 1988

⁷ <https://www.mygov.scot/funeral-support-payment/who-can-apply-and-when>

from their abuser, which is most acute at the point of leaving, but also from wider harms associated with poverty and insecurity. Women cannot be in a position where they make a decision to leave an abusive environment on the basis of a fund to support them but are then faced with an insufficient amount or rejection. We also know that low-paid women in employment have reported being rejected for existing SWF grants.

Any discretionary fund approach should have standalone co-produced guidance and be administered by workers with specific training on domestic abuse. Women should not be required to leave their partner and make themselves destitute before being able to claim as safety should be the over-riding factor. A fund will also have to reconcile with the realities of domestic abuse. Women do leave a partner and then sometimes return for a variety of factors. SWF crisis grants are in principle limited to 3 claims in a 12 month period, which should not be the case for a domestic abuse fund that is capable of responding to individual circumstances.

Evidence and eligibility

However it is delivered, the new payment should not require claimants to 'prove' their abuse. However we recognise that some form of consideration will be necessary. We recommend that given the short-term nature of the payment and relatively low cost of individual payments to the state, the evidence burden be as low as possible and satisfied through a number of avenues. A new payment with a complex referral or evidence process that delays receipt will not meet the ambitions of mitigating the impacts of the five-week wait.

Evidence of eligibility could include referrals from listed agencies or bodies, schools, trusted third sector organisations or the existence of a crime number. In a more discretionary model, the accepted evidence list could be open ended.

Means-testing

We do not believe that the payment should be means-tested. The link between need and entitlement should be considered broadly in terms of practical access to resource and ensuring physical safety. Women who leave an abusive partner may not have been previously eligible for UC or other low-income benefits before leaving and may not intend or need to go on to claim them after leaving. This does not however mean that they will have had access to household income to prepare them for leaving.

Actions from meeting on 21/04/2022

- redacted-38(1)(b) will pull together some case studies which outline the journey options, including gaps
- redacted-38(1)(b) to get SWF data analysis if available
- Draw out existing models of funding.
- Consider the ask of SWA members before redacted-38(1)(b) surveys them on what they may have provided funding for
- Set up follow up meeting in June

Email with case studies – 16/06/2022

From: redacted-38(1)(b)

Sent: 16 June 2022 16:50
To: redacted-38(1)(b) MacKean C (Catriona); redacted-38(1)(b)
redacted-38(1)(b)
Cc: redacted-38(1)(b)
Subject: Re: DA imp group - financial support follow up
Attachments: domestic abuse cases.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Hello

At our last meeting we agreed that I would forward case studies highlighting the gaps in the social security system that make it difficult for women to leave domestic abuse. Please find a compilation of cases attached.

Please get in touch if you would like to discuss any of them in more detail. Apologies for the delay in getting this to you all.

Best wishes

redacted-38(1)(b)

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From: redacted-38(1)(b)
Sent: 07 June 2022 3:20 PM
To: Catriona.MacKean@gov.scot <Catriona.MacKean@gov.scot>; redacted-38(1)(b)
Cc: redacted-38(1)(b)
Subject: DA imp group - financial support follow up
When: 14 July 2022 14:00-14:45.
Where: Microsoft Teams Meeting

This is the date that suits most.

redacted-38(1)(b) I am aware you are unable to make it (me too) but hopefully the other attendees can feed back?

Case studies

Preparing to leave

In order for a woman to leave an abusive partner, she needs somewhere safe to go and the financial means to survive. Some women may not have any money, and if they do, they may not be able to access it.

It is very difficult for a woman to make a claim for benefits in preparation for leaving her partner. For example:

A woman planning to leave her abusive partner claimed universal credit (UC) as she thought she would be re-housed soon. DWP told her she could only make a claim as a couple while she was still living with her soon to be ex-partner. #5064 (8/3/21)

A claimant is included in her partner's claim for employment and support allowance. She wants to claim a benefit in her own right so she can prepare to leave him, but if she does he will be alerted to the change in his benefits. She fears this will cause further aggravation. #4189 (10/2/22)

There is no provision to help with rent or a deposit in advance.

The police have advised a woman to leave her husband for her own protection after he has been arrested twice for domestic abuse. She has secured a one bedroom flat but needs to pay a deposit and one month's rent in advance. If she can convince DWP that she is no longer living as husband and wife, she may be able to claim UC before she leaves. However it is possible that DWP will not accept this while she is still living with her husband. Furthermore, if the wife is included in any of her husband's benefit claims, he will be alerted if she makes a claim for UC on her own. #4196(19/1/21)

At least a 5 week wait for universal credit

It is much easier to claim UC once you are no longer living with your partner, however you will not receive your first payment for at least five weeks. You can request an advance, however this will have to be paid back from future payments of UC.

A mum with a two year old applied for UC and was only offered an advance of £150 – it is not known why the amount was so low and there is no right of appeal. #2438 (15/9/21)

Advances are usually paid at 100% of the amount the claimant will expect to receive. As this mum had no other income it is unclear why the amount offered was so low, but it was definitely not enough to provide adequate support for five weeks or more.

Universal credit issues

The cases below highlight that claiming UC is not always straight forward.

A mum recently fled domestic abuse with her three children and then applied for UC. She was only awarded an amount for herself (£324) and not for her three children. This would appear to be an error on DWP's part but may take a while to resolve. #2945 (20/10/21)

When a woman tried to claim UC after she left her husband due to domestic abuse, she discovered he was already claiming UC for them both. She assumed her new single claim would remove her from the couple claim, but DWP have refused to accept the new claim on the basis that she is already included in the couple claim. #856 (17/5/21)

A woman who currently receives an additional amount in her benefits due to severe disability is planning to go into refuge in another local authority due to domestic abuse. The move to another local authority will trigger a claim for UC. She will receive an additional amount in respect of her severe disability but the value of this will erode over time if other elements of her UC increase.

#5081 (15/3/21)

Rent

The cases below highlight that women who flee abuse are often liable for their notice period in their old tenancy, whilst having to pay rent for their new tenancy – often with social security only paying rent on one of the properties.

A mum and her child had to flee their housing association tenancy due to domestic abuse and are now staying in temporary accommodation. She is supposed to give the housing association a month's notice before her tenancy can end, but UC stopped paying her housing costs (in accordance with UC rules) when she moved out because she has no intention to return. #2549

(21/9/21)

Housing benefit will pay her temporary accommodation costs, but she will have to ask for a discretionary housing payment (which may not be granted) or pay the final month's rent herself, which is simply not affordable.

A woman moved from one housing association tenancy to another due to the threat of domestic abuse. She had to move immediately, but is being held liable for her 28 day notice period on her tenancy. She has applied for a discretionary housing payment to cover her notice period but this has been refused, stating that as she has moved within the same landlord, the housing association should not be holding her to the notice period, but this is not something she has any control over. #2789 (12/10/21)

Because the woman is getting housing benefit she may be able to request a two homes payment to cover the unavoidable overlap of liability to pay rent, but housing benefit may take the same position as discretionary housing payments. Scottish Women's Aid report that women usually are not awarded a two homes payment unless they can demonstrate that they intend to return home. There are no two homes payments in UC for unavoidable overlaps of rent liability.

Councils and housing associations often require new tenancies to start immediately but housing benefit will not make two homes payments until the woman actually moves in to her new home. She cannot move in until she's got some furnishings to move in with – (although some women do move in with very little and 'camp out' until a Scottish welfare fund community care grant comes through – or aren't entitled as they are working even on a very low income).

NB Discretionary housing payments can only be granted if you are receiving housing benefit or the housing costs of UC towards your rent.

Scottish welfare fund

Moves into permanent accommodation, from temporary accommodation or refuge, are often delayed due to long processing times for community care grants for household essentials that are needed before the tenant can move in.

A woman in refuge has been offered a housing association tenancy but has not been able to move in yet because the local authority are taking a long time to process her community care grant for household essentials. Housing benefit continue to pay rent in the refuge, but universal credit will not begin to pay housing costs for the new tenancy until the woman moves in. This means the woman will begin her new tenancy with rent arrears. #1432 (28/6/21)

A mum with two children who has fled domestic abuse signed up to a new tenancy and immediately applied for a community care grant for furniture. Almost 4 weeks later she has still not received a decision, although the mum's adviser is hopeful of a positive decision. She is concerned however that people waiting for furniture from the company that fulfil this local authority's community care grants have experienced long delays, which could delay this family's move even more. #659 (7/6/22)

It is common to hear of individuals being unable to move into a property until a community care grant is awarded – but there is an even greater degree of urgency when the family are fleeing domestic abuse.

Child benefit

If someone else is claiming benefits in respect of children in the household it can take a long time to resolve any disputes and have the children included any new claims for benefit.

A mum and her three children have just escaped domestic abuse. Her husband is still getting the child benefit but not passing it on to her. She can make a competing claim for child benefit just now, but the husband will continue to receive it for a further three weeks and it may be longer before it is paid to her. #461 (24/5/22)

The mum could request a crisis grant from the Scottish Welfare Fund in the meantime, but there is no guarantee that this would be paid or at what level.

Students

Full time students are usually not entitled to claim UC (unless they meet one of the exceptions, for example as a parent). This makes it extremely difficult for students to obtain an independent income to allow them to leave an abusive partner.

A full time student who was subject to honour-based domestic abuse, fled from one local authority area to another. Despite being in early stages of pregnancy she did not meet any of the exceptions that would allow a full time student to claim UC or housing benefit. The temporary accommodation charge was £240 a week so she has accrued almost £5000 in housing costs arrears. #4454 (3/2/21)

Migrants

Likewise, many migrants are not entitled to any benefits, or if they are, they may face long processing delays before they will receive any benefit.

An EU national with two young children left her partner recently due to domestic abuse. She applied for UC soon after but more than six weeks later, she has still not received any money and has nothing to live on. #1636 (13/7/21)

- Although this client is an EU national, she was in a group that should have been entitled to UC, but claims involving EU nationals frequently take a long time to process.
- The client has been advised to make a claim to the Scottish Welfare Fund but the success of such applications varies between local authorities.

An EU national with a toddler recently left her husband due to domestic abuse – which included claiming UC as a couple and refusing to give her any money. She has pre-settled status which does not confer rights to benefits, so the client has no money. #2282 (2/9/21)

CPAG challenged the rule excluding EU nationals with pre-settled status from eligibility for benefits, but were not successful and the rule stands.

A woman with two children, who was in the UK on a spousal visa had to leave her husband due to domestic abuse. She has been granted a three month temporary visa with recourse to public funds and made a claim for UC. She has been incorrectly advised that this cannot be paid until she is allocated a national insurance number. She can challenge this, but in the meantime she has no money. #1924 (5/8/21)

A woman came to the UK from the USA on a student visa over 15 years ago. She overstayed her visa, is working and has children. She is trying to leave her partner due to domestic abuse but has no entitlement to benefits and social work have refused to provide assistance because she is working and have told her she will have to go back home to the USA. #4266 (21/1/21)

Financial abuse

95% of cases of domestic abuse involve economic abuse.⁸ This means that women trying to leave their partner may have no income of their own, or be unable to access any money that they do have. Without access to money it is very difficult to leave an abuser and access safety. Women who do leave, often leave with nothing, with no money for essentials, in debt and with poor credit ratings, with lasting impacts on their economic stability.

A woman's husband hid all her letters. She missed a letter asking her to renew her son's claim for disability living allowance, so it stopped and as a consequence so did her carer's allowance. The husband is now in prison and the woman now has to reclaim all the benefits that were stopped. This may take some time. #200 (2/5/22)

A disabled woman left everything behind to escape domestic abuse and has now settled into a new tenancy with her adult daughter. She has part ownership of three houses which are rented out but the income all goes to her husband. This is in the hands of her solicitors, but in the meantime she has been told that she cannot claim UC to help with her rent. It may be possible to

⁸ <https://survivingeconomicabuse.org/what-is-economic-abuse/>

challenge this decision – but in the meantime she has no means of paying her rent. #1883 (30/7/21)

A woman's abusive ex-partner held appointeeship with DWP in relation to her benefit claims. This prevented her from being able to speak to the DWP or change her address. The appointeeship was eventually revoked (following assistance from CPAG). In the meantime the woman was sent a form asking her to reapply for personal independence payment before the current award ended. The letter went to the appointee, her ex-partner, so she never received it. When she did not reapply her personal independence payment stopped. She had to make a new claim once the appointeeship was revoked but was left with a gap (and loss of income) between one award ending and another being granted. #5211 (23/3/21)

Client living with financially abusive husband wants her share of their joint UC claim paid into her own bank account. Her husband withholds money unless she does what he says and so she is obliged to cook, clean, eat with him etc, so, as far as the DWP is concerned, they are "a couple". A worker from Women's Aid accompanied the client to the Jobcentre and they agreed to accept this as evidence of financial abuse. However, client was then phoned to be told that she would only be able to have her share of the money if her husband agreed to it in the journal. #5197 (19/3/21)

Actions from meeting on 18/08/2022

DA Imp Group – Financial Support follow up meeting – 18 August 2022

Catriona MacKean, redacted-38(1)(b)

Actions:

- Cost of Living Crisis impacting the lowest income earners. Most likely to be equalities groups – Speak to Equalities Unit on evidence of this – redacted-38(1)(b)
- Develop proposal on short term fund to include; what it would look like, who would distribute it or delivery mechanism; scale of fund; costs involved; range of payments; and link to all cross cutting policy areas. redacted-38(1)(b)
- Explore role of other organisations, such as Housing Options Scotland, to deliver a fund - Catriona
- Explore with Scottish Welfare Fund officials if SWF could deliver a fund ?
- Check with SWF officials if there is any data or a breakdown on what funding has been given for domestic abuse – redacted-38(1)(b)
- Check with Best Start Grant officials on their budget and what is expected to go to women experiencing domestic abuse – redacted-38(1)(b)
- Invite BSG officials to work stream 4 meetings – redacted-38(1)(b)
- Next meeting mid-September - redacted-38(1)(b)

Submission to Ministers – financial support to leave and abusive partner – 29/06/2023

**Minister for Housing
Minister for Equalities, Migration and Refugees
Minister for Victims and Community Safety**

FINANCIAL SUPPORT TO LEAVE AN ABUSIVE PARTNER

Priority and Purpose

1. Routine

Recommendation

2. Recommend that you agree to scoping by officials of the feasibility of a fund to provide immediate financial support to women experiencing domestic abuse to leave an abusive partner.

Context and Issues

Background

3. Domestic abuse is the most common reason for women applying for homelessness assistance. In 2021/22, nearly a quarter of women making a homelessness application cited the reason due to *dispute within household: violent or abusive*.
4. We commissioned a working group, co-chaired by Scottish Women's Aid (SWA) and the Chartered Institute of Housing (CIH) Scotland, to look at the actions needed to prevent homelessness for women and children experiencing domestic abuse.
5. In December 2020, the *Improving Housing Outcomes for Women and Children Experiencing Domestic Abuse in the social rented sector* report was published. We accepted all 27 recommendations in principle and convened an SG official led implementation group to take forward the actions needed.
6. One of the recommendations states: *Financial support for women experiencing domestic abuse - The Scottish Government should explore options for a dedicated support fund, or entitlements with clear guidance and capable of delivering short-term recurring payments, to support women leaving an abusive partner. This should include essential crisis costs to enable a woman to leave and to bridge the gap between leaving and the first Universal Credit payment.*

Policy Objective

7. We have been working with Engender, SWA and Child Poverty Action Group (CPAG) to develop a proposal in response to this recommendation. They have told us that women experiencing domestic abuse are often unable to leave abusive partners due to financial implications and economic coercive control. This leads to women and children staying in unsafe situations.
8. There are a wide range of issues relating to domestic abuse that are additional barriers to leaving an abuser. These include challenges in accessing competent legal advice and representation and issues navigating the social security system including:
 - Women claiming benefits in a couple are unable to make a new claim for benefit as a single person without alerting their partner
 - No financial support for deposits or rent in advance
 - Minimum five week wait for the first payment of universal credit
 - The two-child limit and benefit cap reduce awards of universal credit considerably
 - Child benefit claims taking months to be transferred from one partner to another if there is a dispute about who should receive it.
 - Women being refused or having to wait for grants from the Scottish Welfare Fund
9. Stakeholders indicate that evidence of other financial implications as a result of domestic abuse include:
 - The abuser incurring debt in joint names or in the victim's name
 - Lengthier waits for survivors who have escaped without ID and documentation, or who have no bank account due to economic abuse
 - Financial control and coercion does not always end on separation
10. While we can work with Social Security colleagues to represent interests of women facing homelessness as a result of Domestic Abuse to DWP, any change will be challenging to secure support for and would take considerable time to implement. The objective of the 'fund to leave' is to act within our devolved powers to provide financial support to women so they have immediate relief from destitution and poverty when they leave their current home for a place of safety because of domestic abuse.
11. Providing this financial support will remove barriers to enable women more time and space to access a range of support and consider their needs, including housing needs, to build a new life, safely.
12. CPAG provided us with some case studies highlighting difficulties women face in leaving an abusive partner. These case studies are at Annex A for information.

Discretionary Housing Payments (DHPs)

13. The case studies outline some financial support that is available, such as Discretionary Housing Payments (DHPs), but also highlight why accessing these financial supports are not always an option for women seeking to leave an abusive partner.

14. DHPs are administered by local authorities and support tenants struggling with their housing costs where Universal Credit or Housing Benefit does not cover the cost of their rent. Only those in receipt of Housing Benefit or the housing element of Universal Credit who require further financial assistance in order to meet housing costs are eligible to apply.

Similar schemes in operation

15. In March 2023, the UKG confirmed they are trialling a new approach to supporting victims with a flexible fund of £300k, which will provide one-off payments of £250 to victims of domestic abuse, rising to £500 where a victim has children.

16. The money is being allocated to Women's Aid, given their national reach, expertise and existing infrastructure to provide urgent financial support to victims of domestic abuse who need it most. It will help victims to pay for essentials such as groceries, nappies, sanitary products and rent on their previous property whilst they are in a refuge, or it could be put towards a deposit on new accommodation when they leave a refuge.

17. In December 2022, TSB announced its 'Emergency Flee Fund' for domestic abuse victims, which will offer existing customers who are impacted by domestic abuse an 'Emergency Flee Fund' payment of up to £500 to help escape an abusive relationship. Scottish TSB customers could take advantage of this scheme.

Gender Based Violence

18. Our focus on women doesn't mean that men don't experience domestic abuse or that support is not available. Our approach recognises that women and girls are disproportionately affected by particular forms of violence that they experience because they are women and girls.

19. Men's and women's experiences of homelessness are very different. We are focusing on preventing homelessness for women as a result of domestic abuse as it is the main reason for women making a homelessness application. It is not the main reason for men making a homelessness application.

20. redacted-30(b)(i).

21. redacted-30(b)(i)

Assessment of Options

22. In light of the volume of homelessness applications driven by experience of domestic abuse, and the impact on victims when housing is used as an element of coercive control and a barrier to leaving, there is a case to explore the impact of a fund to leave. redacted-30(b)(i).

23. redacted-30(b)(i)

24. On balance, to take the action we can to prevent homelessness for a key at risk group, we recommend you agree to further scoping and advice to propose a national test of change, funded directly by SG, to progress our response to this recommendation and establish a baseline of evidence for the potential impact of the investment. redacted-30(b)(i).

25. Officials have gathered extensive information about a 'fund to leave'. We can build on experience elsewhere and the knowledge of stakeholders to establish the details, including options for budget allocation assessed for value for money; proposals for the delivery method; fund criteria and mitigating the risks of unintended consequences. Unintended consequences will include whether DWP view any 'fund to leave' payment as a form of income which will, in turn, affect any subsequent UC payment.

26. redacted-30(b)(i)

27. The Housing Element of UC will usually cover the cost of rent in the social sector, but in the private rented sector claimants are subject to local housing allowance (LHA). The monthly LHA is based on size and location of accommodation and in Scotland range from the lowest rate at £260 for a room in Dumfries and Galloway to the highest rate at £1,695 for 4 bedrooms in the Lothians⁹. Single people under 35 years old are only eligible for a single room rate.

28. These amounts are also subject to the bedroom tax and benefit cap, which can be mitigated via claiming DHPs. These figures are for illustration purposes to indicate our intention to use as the basis of cost analysis.

29. If you are content with our recommendation, we would progress further scoping with partners, including local authorities, SWA, CIH, Engender, CPAG, social security and other relevant stakeholders. We will also work with the Implementation and Monitoring Group established to support delivery of the recommendations for improving housing outcomes. This will include establishing the detail of what the potential cost will be and how many women can potentially benefit from the fund.

30. We recommend you agree to officials scoping the feasibility of a fund redacted-30(b)(i) to progress a time limited, evaluated test of change redacted-30(b)(i)

out of scope

redacted-30(b)(i)

⁹ [Scotland: Universal Credit Local Housing Allowance monthly rates 2023 to 2024 - GOV.UK \(publishing.service.gov.uk\)](https://www.gov.uk/publishing.service.gov.uk)

Sensitivities

31. SWA and CIH have been critical in discussion with officials of the length of time it is taking to implement the 2020 recommendations. Officials, SWA and CIH agreed the prioritisation of actions within the Scottish Government led implementation group.

out of scope

As part of its media activity around 16 days of Activism in November, SWA called on the Scottish Government to “keep its promises” to people experiencing domestic abuse during the Cost of Living Crisis, including establishing a leaving fund. redacted-30(b)(i)

32. The Minister for Housing is scheduled to have an introductory meeting with SWA CEO Marsha Scott on 9 August. We expect the ‘fund to leave’ will be raised during this meeting.

out of scope

Conclusions and next Steps

33. That you agree to homelessness and equality unit officials scoping the feasibility and development of a fund to provide financial support to women experiencing domestic abuse to leave an abusive partner. If you are content, we will provide further detailed advice on options for decision.

redacted-38(1)(b)

Directorate for Local Government and Housing
Better Homes Division

redacted-38(1)(b)

Cabinet Secretaries and Ministers Copy List	For Action	For Information Portfolio interest	For Information Constituency interest	For Information General awareness
Cabinet Secretary for Social Justice		X		
Cabinet Secretary for Justice		X		

Officials Copy List

DG Communities
Director for Local Government and Communities
Director for Equality, Inclusion & Human Rights

Officials Copy List

Catriona MacKean, Deputy Director, Better Homes
Catherine McMeeken, Deputy Director,
redacted-38(1)(b)

CASE STUDIES FROM CPAG

ANNEX A

Preparing to leave

In order for a woman to leave an abusive partner, she needs somewhere safe to go and the financial means to survive. Some women may not have any money, and if they do, they may not be able to access it.

It is very difficult for a woman to make a claim for benefits in preparation for leaving her partner. For example:

A woman planning to leave her abusive partner claimed universal credit (UC) as she thought she would be re-housed soon. DWP told her she could only make a claim as a couple while she was still living with her soon to be ex-partner. #5064 (8/3/21)

A claimant is included in her partner's claim for employment and support allowance. She wants to claim a benefit in her own right so she can prepare to leave him, but if she does he will be alerted to the change in his benefits. She fears this will cause further aggravation. #4189 (10/2/22)

There is no provision to help with rent or a deposit in advance.

The police have advised a woman to leave her husband for her own protection after he has been arrested twice for domestic abuse. She has secured a one bedroom flat but needs to pay a deposit and one month's rent in advance. If she can convince DWP that she is no longer living as husband and wife, she may be able to claim UC before she leaves. However it is possible that DWP will not accept this while she is still living with her husband. Furthermore, if the wife is included in any of her husband's benefit claims, he will be alerted if she makes a claim for UC on her own. #4196(19/1/21)

At least a 5 week wait for universal credit

It is much easier to claim UC once you are no longer living with your partner, however you will not receive your first payment for at least five weeks. You can request an advance, however this will have to be paid back from future payments of UC.

A mum with a two year old applied for UC and was only offered an advance of £150 – it is not known why the amount was so low and there is no right of appeal. #2438 (15/9/21)

Advances are usually paid at 100% of the amount the claimant will expect to receive. As this mum had no other income it is unclear why the amount offered was so low, but it was definitely not enough to provide adequate support for five weeks or more.

Universal credit issues

The cases below highlight that claiming UC is not always straight forward.

A mum recently fled domestic abuse with her three children and then applied for UC. She was only awarded an amount for herself (£324) and not for her three children. This would appear to be an error on DWP's part but may take a while to resolve. #2945 (20/10/21)

When a woman tried to claim UC after she left her husband due to domestic abuse, she discovered he was already claiming UC for them both. She assumed her new single claim would remove her from the couple claim, but DWP have refused to accept the new claim on the basis that she is already included in the couple claim. #856 (17/5/21)

A woman who currently receives an additional amount in her benefits due to severe disability is planning to go into refuge in another local authority due to domestic abuse. The move to another local authority will trigger a claim for UC. She will receive an additional amount in respect of her severe disability but the value of this will erode over time if other elements of her UC increase. #5081 (15/3/21)

Rent

The cases below highlight that women who flee abuse are often liable for their notice period in their old tenancy, whilst having to pay rent for their new tenancy – often with social security only paying rent on one of the properties.

A mum and her child had to flee their housing association tenancy due to domestic abuse and are now staying in temporary accommodation. She is supposed to give the housing association a month's notice before her tenancy can end, but UC stopped paying her housing costs (in accordance with UC rules) when she moved out because she has no intention to return. #2549 (21/9/21)

Housing benefit will pay her temporary accommodation costs, but she will have to ask for a discretionary housing payment (which may not be granted) or pay the final month's rent herself, which is simply not affordable.

A woman moved from one housing association tenancy to another due to the threat of domestic abuse. She had to move immediately, but is being held liable for her 28 day notice period on her tenancy. She has applied for a discretionary housing payment to cover her notice period but this has been refused, stating that as she has moved within the same landlord, the housing association should not be holding her to the notice period, but this is not something she has any control over. #2789 (12/10/21)

Because the woman is getting housing benefit she may be able to request a two homes payment to cover the unavoidable overlap of liability to pay rent, but housing benefit may take the same position as discretionary housing payments. Scottish Women's Aid

report that women usually are not awarded a two homes payment unless they can demonstrate that they intend to return home. There are no two homes payments in UC for unavoidable overlaps of rent liability.

Councils and housing associations often require new tenancies to start immediately but housing benefit will not make two homes payments until the woman actually moves in to her new home. She cannot move in until she's got some furnishings to move in with – (although some women do move in with very little and 'camp out' until a Scottish welfare fund community care grant comes through – or aren't entitled as they are working even on a very low income).

NB Discretionary housing payments can only be granted if you are receiving housing benefit or the housing costs of UC towards your rent.

Scottish welfare fund

Moves into permanent accommodation, from temporary accommodation or refuge, are often delayed due to long processing times for community care grants for household essentials that are needed before the tenant can move in.

A woman in refuge has been offered a housing association tenancy but has not been able to move in yet because the local authority are taking a long time to process her community care grant for household essentials. Housing benefit continue to pay rent in the refuge, but universal credit will not begin to pay housing costs for the new tenancy until the woman moves in. This means the woman will begin her new tenancy with rent arrears. #1432 (28/6/21)

A mum with two children who has fled domestic abuse signed up to a new tenancy and immediately applied for a community care grant for furniture. Almost 4 weeks later she has still not received a decision, although the mum's adviser is hopeful of a positive decision. She is concerned however that people waiting for furniture from the company that fulfil this local authority's community care grants have experienced long delays, which could delay this family's move even more. #659 (7/6/22)

It is common to hear of individuals being unable to move into a property until a community care grant is awarded – but there is an even greater degree of urgency when the family are fleeing domestic abuse.

Child benefit

If someone else is claiming benefits in respect of children in the household it can take a long time to resolve any disputes and have the children included any new claims for benefit.

A mum and her three children have just escaped domestic abuse. Her husband is still getting the child benefit but not passing it on to her. She can make a competing claim

for child benefit just now, but the husband will continue to receive it for a further three weeks and it may be longer before it is paid to her. #461 (24/5/22)

The mum could request a crisis grant from the Scottish Welfare Fund in the meantime, but there is no guarantee that this would be paid or at what level.

Students

Full time students are usually not entitled to claim UC (unless they meet one of the exceptions, for example as a parent). This makes it extremely difficult for students to obtain an independent income to allow them to leave an abusive partner.

A full time student who was subject to honour-based domestic abuse, fled from one local authority area to another. Despite being in the early stages of pregnancy she did not meet any of the exceptions that would allow a full time student to claim UC or housing benefit. The temporary accommodation charge was £240 a week so she has accrued almost £5000 in housing costs arrears. #4454 (3/2/21)

Migrants

Likewise, many migrants are not entitled to any benefits, or if they are, they may face long processing delays before they will receive any benefit.

An EU national with two young children left her partner recently due to domestic abuse. She applied for UC soon after but more than six weeks later, she has still not received any money and has nothing to live on. #1636 (13/7/21)

- Although this client is an EU national, she was in a group that should have been entitled to UC, but claims involving EU nationals frequently take a long time to process.
- The client has been advised to make a claim to the Scottish Welfare Fund but the success of such applications varies between local authorities.

An EU national with a toddler recently left her husband due to domestic abuse – which included claiming UC as a couple and refusing to give her any money. She has pre-settled status which does not confer rights to benefits, so the client has no money. #2282 (2/9/21)

CPAG challenged the rule excluding EU nationals with pre-settled status from eligibility for benefits, but were not successful and the rule stands.

A woman with two children, who was in the UK on a spousal visa had to leave her husband due to domestic abuse. She has been granted a three month temporary visa with recourse to public funds and made a claim for UC. She has been incorrectly advised that this cannot be paid until she is allocated a national insurance number. She can challenge this, but in the meantime she has no money. #1924 (5/8/21)

A woman came to the UK from the USA on a student visa over 15 years ago. She overstayed her visa, is working and has children. She is trying to leave her partner due to domestic abuse but has no entitlement to benefits and social work have refused to

provide assistance because she is working and have told her she will have to go back home to the USA. #4266 (21/1/21)

Financial abuse

95% of cases of domestic abuse involve economic abuse.¹⁰ This means that women trying to leave their partner may have no income of their own, or be unable to access any money that they do have. Without access to money it is very difficult to leave an abuser and access safety. Women who do leave, often leave with nothing, with no money for essentials, in debt and with poor credit ratings, with lasting impacts on their economic stability.

A woman's husband hid all her letters. She missed a letter asking her to renew her son's claim for disability living allowance, so it stopped and as a consequence so did her carer's allowance. The husband is now in prison and the woman now has to reclaim all the benefits that were stopped. This may take some time. #200 (2/5/22)

A disabled woman left everything behind to escape domestic abuse and has now settled into a new tenancy with her adult daughter. She has part ownership of three houses which are rented out but the income all goes to her husband. This is in the hands of her solicitors, but in the meantime she has been told that she cannot claim UC to help with her rent. It may be possible to challenge this decision – but in the meantime she has no means of paying her rent. #1883 (30/7/21)

A woman's abusive ex-partner held appointeeship with DWP in relation to her benefit claims. This prevented her from being able to speak to the DWP or change her address. The appointeeship was eventually revoked (following assistance from CPAG). In the meantime the woman was sent a form asking her to reapply for personal independence payment before the current award ended. The letter went to the appointee, her ex-partner, so she never received it. When she did not reapply her personal independence payment stopped. She had to make a new claim once the appointeeship was revoked but was left with a gap (and loss of income) between one award ending and another being granted. #5211 (23/3/21)

Client living with financially abusive husband wants her share of their joint UC claim paid into her own bank account. Her husband withholds money unless she does what he says and so she is obliged to cook, clean, eat with him etc, so, as far as the DWP is concerned, they are "a couple". A worker from Women's Aid accompanied the client to the Jobcentre and they agreed to accept this as evidence of financial abuse. However, client was then phoned to be told that she would only be able to have her share of the money if her husband agreed to it in the journal. #5197 (19/3/21)

Email with development paper – 13 July 2023

¹⁰ <https://survivingeconomicabuse.org/what-is-economic-abuse/>

From: redacted-38(1)(b)
Sent: 13 July 2023 15:12
To: redacted-38(1)(b)
Cc: redacted-38(1)(b)
Subject: Fund to leave - development paper - version 2 - July 2023 (A44478445)
Attachments: Fund to leave - development paper - version 2 - July 2023.docx

redacted-38(1)(b)

Please see attached development paper for the fund to leave as discussed with redacted-38(1)(b) and redacted-38(1)(b) separately. This version includes both mine and redacted-38(1)(b) thoughts (am calling mine a brain dump) and very much welcome all your thoughts and input into this development paper.

I would like us to all meet, preferably in person but appreciate the difficulties of that, to discuss our approach and also getting input from stakeholders. There is a stakeholder list in the paper so please do add any that you think are missing.

redacted-38(1)(b), I have included you as I know you may want to add more to this paper so this is the most recent version.

It would be helpful to have your responses by Friday 21 July, then I will set up a time for us all to get together to start to form some options.

Please let me know if you have any questions or if the deadline poses any issues.

Many thanks

redacted-38(1)(b)
Homelessness Unit, Homelessness Prevention Team
The Scottish Government, Atlantic Quay, Glasgow, G2 8LU

Temporary contact number – redacted-38(1)(b)
redacted-38(1)(b)

Fund to leave – Development Paper

Background

- Women's pre-existing economic inequality means they have fewer financial resources, capital /savings and more existing debt.
- Women's disadvantaged position in the labour market, including part-time, insecure and/or low-paid employment and unpaid care work, has a direct impact on their incomes and poverty.
- Women's caring responsibilities, interrupted employment patterns, and lower incomes make them more reliant on social security, with women twice as likely to be reliant on social security as men.

- Single parents (95% women), BME women and disabled women have been particularly impacted by the social, economic, and labour market implications of the pandemic.¹¹
- Women who lived in households that earned less than £10,000 were more than four times as likely (14.3%) to have experienced partner abuse in the last 12 months than women living in households with an income of £50,000 or more (3.3%).¹²
- In line with the recent response to Scotland ending food bank usage ‘Cash First’¹³, this solution is about providing a cash solution; which is more empowering, allows for broader range of solutions to be sought than vouchers, and treats people in need with dignity.

Recommendation - Financial support for women experiencing domestic abuse

The Scottish Government should explore options for a dedicated support fund, or entitlements with clear guidance and capable of delivering short-term recurring payments, to support women leaving an abusive partner. This should include essential crisis costs to enable a woman to leave and to bridge the gap between leaving and the first Universal Credit payment.

It is important that such a fund is quickly accessible to victims, with as little paper trail in terms of a perpetrator knowing of the fund, or having information on where a victim is. It will also be important to have solutions for women who have no bank account, or no access to their bank account. We need a solution that works across urban and rural locations, and to build in a monitoring and recording system that is not burdensome, but allows us to learn in terms of what works over time. Key to the implementation of this will be around awareness of the fund existing too. The fund should be extremely useful in terms of the monies offered, as well as may provide other general support, as well as housing support, and financial support; it could include possibilities for working with new partners, including financial institutions.

Considerations	Questions	Thoughts	Other info
Name	Fund to leave doesn't seem appropriate. What should this fund be called?	<ul style="list-style-type: none"> • redacted–30(b)(i) 	Already in place (don't want to confuse): <ul style="list-style-type: none"> • Discretionary Housing Payment (DHP) • Scottish Welfare Fund – Crisis grants and Community Care Grants (CCGs) • Self-Directed Support (SDS) • Hardship Grant / Fund

¹¹ <https://www.engender.org.uk/content/publications/Close-the-Gap-and-Engender-Joint-Briefing-on-the-impact-of-COVID-19-on-women-with-childcare-responsibilities-in-Scotland.pdf>

¹² <https://womensaid.scot/wp-content/uploads/2022/09/SWA-Briefing-the-cost-of-living-crisis-Sept-22.pdf>

¹³ <https://www.gov.scot/publications/cash-first-towards-ending-need-food-banks-scotland/>

			<ul style="list-style-type: none"> Emergency Flee Fund (TSB)
Cost	redacted–30(b)(i)	redacted–30(b)(i)	<ul style="list-style-type: none"> Personalised budgets: (initially 2010 up to 3k per person, average spent £794)¹⁴ CCG average 20/21: £692¹⁵ Crisis Grant average 20/21: £115¹⁶ Hardship Grant/ Fund: usually £500¹⁷ TSB Emergency Flee fund: Up to £500¹⁸ English / Welsh equivalent to fund is £250 / £500¹⁹
Considerations	Questions	Thoughts	Other info
Support	<p>Should this fund also come with access to specialist support, including reducing financial related control that still may exist?</p> <p>Also, referrals to appropriate support?</p>	<p>What protocols needs to be put in place, and with which organisations?</p> <p>Does this also give opportunities to help in terms of setting up bank accounts, etc.?</p> <p>Safe Spaces (domestic abuse spaces) are already in banks and pharmacies.</p> <p>It would be great to link it in with at least the SWA domestic abuse helpline number.</p> <p>There is also an opportunity to link in with housing.</p> <p>At the point of fleeing, a woman (and family) can be at more risk than ever, and so this must be considered in terms</p>	<ul style="list-style-type: none"> Someone may not wish to take up support initially, so this should be about opportunities in terms of offering support and engagement, rather than there being a prerequisite that support is taken to receive the money. When considering the support, we should seek the views from Survivors in terms of useful resources and places to link in with; this might differ from one area to another. We may also find that rural and urban are different.

¹⁴ <https://www.jrf.org.uk/report/providing-personalised-support-rough-sleepers>

¹⁵ <https://www.gov.scot/binaries/content/documents/govscot/publications/statistics/2022/07/scottish-welfare-fund-statistics-annual-update-2021-222/documents/scottish-welfare-fund-statistics-annual-update-2021-22/scottish-welfare-fund-statistics-annual-update-2021-22/govscot%3Adocument/scottish-welfare-fund-statistics-annual-update-2021-22.pdf>

¹⁶ <https://www.gov.scot/binaries/content/documents/govscot/publications/statistics/2022/07/scottish-welfare-fund-statistics-annual-update-2021-222/documents/scottish-welfare-fund-statistics-annual-update-2021-22/scottish-welfare-fund-statistics-annual-update-2021-22/govscot%3Adocument/scottish-welfare-fund-statistics-annual-update-2021-22.pdf>

¹⁷ <https://www.citizensadvice.org.uk/benefits/universal-credit/sanctions/hardship-payment/>

¹⁸ <https://www.tsb.co.uk/supporting-you-domestic-or-financial-abuse/>

¹⁹ <https://www.womensaid.org.uk/excellent-start-as-government-announces-pilot-of-emergency-fund-for-domestic-abuse-survivors/>

		<p>of support offered, as well as how this can be accessed.</p> <p>All household members should be considered in terms of the support on offer...for example, the children.</p> <p>There should be support that links to LGBTQ agencies.</p> <p>We need to consider BME support.</p> <p>Links to security measures and how to put these in place would help.</p>	
Considerations	Questions	Thoughts	Other info
Fund Criteria	redacted–30(b)(i)	<ul style="list-style-type: none"> redacted–30(b)(i) 	<ul style="list-style-type: none"> 57% of the people on Universal Credit in April 2023 were women²⁰ redacted–30(b)(i)
Delivery method	redacted–30(b)(i)	redacted–30(b)(i)	Recent qualitative views around help at the point of fleeing is a request from survivors to keep systems as simple as possible.
Pilot/Test of Change	Where do we focus the pilot?	redacted–30(b)(i)	redacted–30(b)(i)
Systems	Can we use existing IT systems or do new ones need to be set up?	<p>What have England / Wales done?</p> <p>What have any of the prevention funds done?</p> <p>Could it link in with SWF, or DHP? (ringfenced)</p>	<ul style="list-style-type: none"> We need a system that has the opportunity to monitor and record. We need a system that is fast. We need a system that doesn't require a bank account in place.
Data	<p>How do we collect relevant and useful data?</p> <p>Do we need data sharing</p>	redacted–30(b)(i)	

²⁰ <https://www.gov.uk/government/statistics/universal-credit-statistics-29-april-2013-to-13-april-2023/universal-credit-29-april-2013-to-13-april-2023>

	agreements?		
Outcomes	What outcomes do we want to see and how will this be monitored	redacted-30(b)(i)	
Evaluation	This needs to be evaluated so we have something to present for evidence of impact.	Can this be done as part of the delivery mechanism?	
Lived experience input	How do we best get involvement of women with lived experience?	SWA has a survivor participation group.	
Raising awareness	How do we promote the fund?	<p>A recent survivor focus group said that one of the most useful places to read about DA help is the back of public toilet doors.</p> <p>Support Teams will be a useful resource in terms of promotion too; RRTP group, etc.</p> <p>The VAWG networks.</p> <p>Public transport.</p> <p>Universities and higher education buildings.</p>	
Migrant women and women with NRPF	What are the implications for someone with NRPF?		

Unintended Consequences	Will this fund effect the recipients benefits or tax?		
Others	<p>What role can the banks play</p> <p>What happens if someone doesn't have a bank account?</p> <p>Can someone receive cash?</p>		

Fund to leave development – Stakeholder engagement

Stakeholders		
Scottish Government		
redacted-38(1)(b)	Equality Unit - VAWG	redacted-38(1)(b)
redacted-38(1)(b)	G/T team	redacted-38(1)(b)
redacted-38(1)(b)	PRS team	redacted-38(1)(b)
redacted-38(1)(b)	RSL team	redacted-38(1)(b)
redacted-38(1)(b)	Social Security – Reserved Benefits team	redacted-38(1)(b)
redacted-38(1)(b)	Asylum and Refugee Integration team	redacted-38(1)(b)
External		
redacted-38(1)(b)	COSLA	redacted-38(1)(b)
redacted-38(1)(b)	COSLA	redacted-38(1)(b)
redacted-38(1)(b)	COSLA	tbc

redacted-38(1)(b)	Improvement Service	redacted-38(1)(b)
redacted-38(1)(b)	ALACHO	redacted-38(1)(b)
redacted-38(1)(b)	ALACHO	redacted-38(1)(b)
redacted-38(1)(b)	SOLACE	redacted-38(1)(b)
?	HO Hub rep	
	Mecopp – get details from redacted-38(1)(b)	
redacted-38(1)(b)	SWA	redacted-38(1)(b)
	Reps from local WA groups?	
redacted-38(1)(b)	CIH	redacted-38(1)(b)
redacted-38(1)(b)	Engender	redacted-38(1)(b)
redacted-38(1)(b)	CPAG	redacted-38(1)(b)
?	Change team rep – ask redacted-38(1)(b)	
redacted-38(1)(b)	Amina – The Muslim Women’s Resource Centre (MWRC)	redacted-38(1)(b)
redacted-38(1)(b)	Cyrenians - Cyrenians launch new housing initiative to help women and children fleeing domestic abuse STV News	
redacted-38(1)(b)	Wheatley Group Rep	redacted-38(1)(b)
redacted-38(1)(b)	Dundee City Council	
?	East Lothian Council	

Meetings	
Researchers	
DWP	
HMRC	
Procurement Team	
Third sector team	

ANNEX A

1. redacted-30(b)(i).

Universal Credit Amounts Monthly Rate²¹	Rates 2022/23 (£)	Rates 2023/24 (£)
Standard allowance – Single		
Single under 25	265.31	292.11
Single 25 or over	334.91	368.74
Child amounts		
First child (born prior to 6 April 2017)	290.00	315.00
First child (born on or after 6 April 2017)/ second child and subsequent child (where an exception or transitional provision applies)	244.58	269.58

2. The Housing Element of UC will usually cover the cost of rent in the social sector, but in the private rented sector claimants are subject to local housing allowance (LHA). The monthly LHA is based on size and location of accommodation and in Scotland range from the lowest rate at £260 for a room in Dumfries and Galloway to the highest rate at £1,695 for 4 bedrooms in the Lothians²². Single people under 35 years old are only eligible for a single room rate.
3. These amounts are also subject to the bedroom tax and benefit cap, which can be mitigated via claiming DHPs. These figures are for illustration purposes to indicate our intention to use as the basis of cost analysis.

Email from CPAG on development paper – 28/07/2023

From: redacted-38(1)(b)
Sent: 28 July 2023 17:29
To: redacted-38(1)(b)
Cc: redacted-38(1)(b)
Subject: RE: Fund to leave - development paper - version 2 - July 2023 (A44478445)
Attachments: Fund to leave - development paper - version 2 - July 2023 KM.docx; CPAG-Scot-EWS-domestic abuse-Oct18 (2).pdf

Hello

Apologies for the delay in getting this back to you.

²¹ [Benefit and pension rates 2023 to 2024 - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

²² [Scotland: Universal Credit Local Housing Allowance monthly rates 2023 to 2024 - GOV.UK \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

I've added some comments to the development paper. Next week I will be working on an explainer about when DHPs can't be accessed at the beginning of tenancies – I think it might be useful for this too – so I will share it as soon as I have finished it.

I've also attached my old report which explains why the benefit system fails people leaving domestic abuse (useful in the context of the SWF I think). I'll have a look for more recent case studies to help illustrate the development paper.

Best wishes

redacted-38(1)(b) | Child Poverty Action Group in Scotland | Unit 9 | Ladywell Business Centre
| 94 Duke Street | Glasgow | G4 0UW

redacted-38(1)(b) | Main: 0141 552 3303

redacted-38(1)(b) | Website: cpag.org.uk/scotland

redacted-38(1)(b)

Subscribe to hear more about CPAG in Scotland: receive regular ebulletins on a variety of different topics such as; e-news; training, events and publications; tax credits and early years; students and benefits; BME communities; Cost of the School Day and more.

From: **redacted-38(1)(b)**

Sent: Thursday, July 13, 2023 3:12 PM

To: **redacted-38(1)(b)**

Cc: **redacted-38(1)(b)** **Subject:** Fund to leave - development paper - version 2 - July 2023 (A44478445)

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

redacted-38(1)(b)

Please see attached development paper for the fund to leave as discussed with **redacted-38(1)(b)** and **redacted-38(1)(b)** separately. This version includes both mine and **redacted-38(1)(b)** thoughts (am calling mine a brain dump) and very much welcome all your thoughts and input into this development paper.

I would like us to all meet, preferably in person but appreciate the difficulties of that, to discuss our approach and also getting input from stakeholders. There is a stakeholder list in the paper so please do add any that you think are missing.

redacted-38(1)(b) I have included you as I know you may want to add more to this paper so this is the most recent version.

It would be helpful to have your responses by Friday 21 July, then I will set up a time for us all to get together to start to form some options.

Please let me know if you have any questions or if the deadline poses any issues.

Many thanks

redacted-38(1)(b) Homelessness Unit, Homelessness Prevention Team
The Scottish Government, Atlantic Quay, Glasgow, G2 8LU

Temporary contact number – redacted-38(1)(b)
redacted-38(1)(b)

A report on social security and domestic abuse

The Early Warning System was developed by Child Poverty Action Group (CPAG) in Scotland to collect and analyse case evidence about how social security changes are affecting the wellbeing of children, their families, and the communities and services that support them.

Scottish Women's Aid assert - 'critical for women to be able to leave an abusive partner is having a safe place to go and knowing that they will have the financial means to survive. It takes considerable courage and immense effort to leave and knowing what will happen to them is central to them making that decision.'¹

¹ Scottish Parliament Equality and Human Rights Committee Inquiry into Destitution, Asylum and Insecure Immigration Status in Scotland Written evidence submitted by Scottish Women's Aid March 2017

Evidence from the Early Warning System indicates that changes in the social security system and the way the system is administered means that people escaping domestic abuse are not guaranteed to have the financial means to survive. This can also jeopardise them having a safe place to go. Failure to put these things in place can result in people returning to their abusive partners.

Delays accessing support

Delays accessing support can leave people escaping domestic abuse with little or no income

A woman with four children, who is escaping domestic abuse, experienced a delay in getting her benefits in place. She tried to claim tax credits but was incorrectly told that she couldn't because she is in a universal credit full service area and she was unable to claim universal credit because new claims cannot be taken from families with more than two children. #15801

A woman who was escaping domestic abuse had no income for six weeks because she was not adequately advised about which benefit to claim and her subsequent claim got lost. #11675

Somewhere safe to go

Case evidence from the Early Warning System indicates that issues with the social security system can:

- ☐ jeopardise people's ability to move out of the family home
- ☐ threaten temporary accommodation arrangements
- ☐ undermine people's ability to sustain permanent accommodation

An adviser from a local authority homelessness service reports that people moving into their temporary accommodation are being refused Scottish Welfare Fund (SWF) community care grants to assist with their moving costs because they are not moving into settled accommodation - including people who have left their homes due to domestic abuse. The SWF guidance indicates that people may be provided assistance in these circumstances and there is nothing stated to infer that they should not be. #764

A woman escaping domestic abuse took her two children to stay temporarily with her brother in an adjoining local authority. She was offered an unfurnished tenancy in the local authority area that she originated from and applied for a community care grant for furniture. Her application was incorrectly refused on the basis that she was not staying in the local authority at the time.*

Discouraged the woman returned to live with her abusive spouse. CPAG67

*Scottish Welfare Fund Guidance states that applications should be considered from people who are moving into the area.

Fleeing domestic abuse, a woman and her young disabled son, went to stay with her dad and brother temporarily in their two bedroom house while she applies for an RSL tenancy. After six weeks the local authority applied a non-dependant deduction wiping out Dad's entitlement to housing benefit, even though a non-dependant deduction should not be applied to someone staying temporarily. The client is working but in considerable debt. Dad says he can't afford to have his daughter staying with him anymore because of the effect on his housing benefit so she and her son will have to move out and make a homeless application. #15992

A lone parent with five children staying in temporary accommodation having left her husband due to domestic abuse, had her housing benefit reduced to 50p a week once the benefit cap was applied. Even when she finds permanent accommodation, it is unlikely that she will receive full support with her rent because the size of her family means she is likely to continue to be affected by the cap #69

A local authority are recovering an overpayment from the ongoing housing benefit of a woman in a Women's Aid refuge. This is a change in most local authorities' policy not to recover overpayments of housing benefit while women are in refuge and getting support and advice to resolve money and debt issues that they are often left with. #16337

Universal credit

There are a number of issues in relation to the design of universal credit (UC) that are of particular concern in relation to people escaping domestic abuse.

Five week wait for first payment – although claimants can receive an advance at the beginning of the claim this can cause financial hardship while this is recovered from subsequent payments. Client's partner claimed UC, got an advance, including housing costs (even though they had none as they were staying with her parents). Client left with her baby due to domestic abuse. The UC advance is being recovered from her income support even though it would appear that current legislation does not allow for UC advances to be recovered from income support. Even so, the DWP would have other means of recovery albeit limited, as the regulations treat her as liable to repay the advance. #18279

Bank account – claimants are often prevented from making a claim by the online claim system if they do not have a bank account.

A client who experienced domestic abuse was prevented from claiming UC because he did not have a bank account. He had shared a bank account with his ex-partner, but it was in her name and she would not let him access it. This caused a two week delay in getting the UC claim started. #12565

Single payment into one bank account – UC requires couples to nominate a single bank account. There are concerns that this could result in less equal relationships, financial abuse and reduce women's financial autonomy.²

² Universal credit and financial abuse: Exploring the links by Surviving Economic Abuse, Women's Budget Group and End Violence Against Women, June 2018.

Worse off under universal credit

The Government have stated that no one will be worse off under universal credit than they are under the benefits that it is replacing. However this only applies to people who are migrating to universal credit under the managed migration programme due to take place between 2019 and 2023. They will be given transitional protection. In the meantime a number of people are moving to universal credit ('natural migration'), from the benefits it is replacing, who are not given transitional protection. Changes of circumstances that might result in someone moving to universal credit prior to managed migration include: those making a new claim as a single person following relationship breakdown (including domestic abuse) or moving to a different local authority area.

A client with three children recently separated from her husband due to domestic abuse. She is £20 a week worse off on UC than she would be if she had been able to claim legacy benefits. #17261
The Universal Credit (Transitional Provisions) (Managed Migration) Amendment Regulations 2018 propose that transitional protection is likely to be lost in the event that someone leaves their partner as this would be considered to be a change of circumstances. It is also proposed that transitional protection will not apply to people living in temporary accommodation or supported housing such as refuges. If people know that they may be worse off as a result of leaving their partner, this may act as a deterrent to them leaving domestic abuse.

Work-related requirements

A UC claimant may not have to look for or prepare for work for 13 weeks (26 weeks if they are the primary carer of a child) if they have experienced domestic violence in the preceding six months. The threshold for meeting this exemption appears to be particularly high - The claimant must:

☒ notify the DWP in the manner required

☒ not have been excused from work related requirements due to domestic violence in the previous 12 months

☒ not be living at the same address as the abuser

☒ provide evidence that their circumstances are consistent with someone who has experienced domestic abuse within the previous six months. This could be from person acting in an official capacity, such as health care professional, police officer, social worker, employer union rep or someone from a domestic abuse charity or organisation. The claimant must have contact with them in the preceding six months in relation to a domestic abuse incident.

Lack of domestic abuse training, publicly available and promoted information often means that people are not made aware of this exemption.

Administrative issues

One third of cases added to the Early Warning System include examples of benefits being processed incorrectly or people being given the wrong information about possible entitlement. The administration of UC is no exception with administrative errors and maladministration contributing to the issues people claiming UC are experiencing.

A woman separated from her partner due to domestic abuse and is now experiencing considerable financial hardship because UC are only paying half of her housing costs, citing that her ex-partner is liable for half the rent as joint tenant. Under the terms of the tenancy either partner can be liable for all of the rent and DWP guidance recognises this. However the guidance refers to people who have been joint tenants and part of the same benefit unit as joint renters rather than joint tenants which may have contributed to the error. #16237

Two child limit

The two-child limit restricts additional amounts paid to support children in tax credits, housing benefit or universal credit, to the first two children in a family, unless an exception applies. Up until 6 April 2017 additional amounts could be included in awards of these benefits for every child in the family. The limit can represent a loss of up to £2780 per additional child per year. There are a number of exceptions from the two-child limit including children likely to have been conceived as the result of rape or a coercive/controlling relationship.

A parent thought that she would be exempt from the two-child limit because her first child was conceived without consent when she was a teenager. She currently has two children but would like to start a family with her new partner. She will not receive additional money for the new baby because the 'rape clause' only applies to third and subsequent children who were conceived without consent and not to first and second children, limiting the number of children a mother may plan to have following the birth of a child conceived without consent. #13538

Client recently separated from her partner due to domestic abuse. She works part time but may have to give up her job to look after her children, one of whom is disabled. At present

she cannot claim UC because she has more than two children and will continue to receive tax credits for all four. There was a significant delay in the client claiming child benefit and child tax credit for her fourth child as she misunderstood the two-child limit. #16578

People from abroad

Since 2014 there have been a number of changes regarding benefit entitlement for people coming from abroad. These were primarily intended to restrict access for EU migrants who were not in work, but have also, to a lesser extent, impacted on British nationals returning to the UK from abroad. Increasingly we see cases regarding migrants, often with children, many of whom are escaping domestic abuse, who are unable to establish entitlement to benefit and have nowhere else to turn.

An EU national fled domestic abuse from her UK national husband. She is currently in emergency accommodation with her two children (age two and nine months), but had been refused housing benefit and income support because she is deemed not have a right to reside that would entitle her to benefits. The circumstances of the case indicate that it may be arguable that she does have a right to reside but there is no guarantee that this would be successful (as it would be reliant on interpretation of case law) and is likely to take time. In the meantime the client has no income. Her husband is looking to exert his parental rights and prevent her returning to Europe with the children, and is building a case asserting that her destitution indicates that she is unfit to look after the children. #709

UK national returned to the UK with her three children fleeing domestic abuse. She had been living with her husband in Europe. She was not entitled to jobseeker's allowance, child benefit or child tax credits for three months on her return and could not get a school clothing grant because she was not receiving a qualifying benefit. She has been awarded a small crisis grant by the SWF, but it is not enough to maintain client and her children for three months. #11847

People from outside the EU may apply for destitution domestic violence concession that would allow them to claim benefits for up to three months while UK immigration considers their application to settle in the UK. However, this only applies to people who have arrived in the UK on a spousal visa and does not apply to people who arrived on other visas for example as a student or who were trafficked.³

³ More information can be found in Scottish Women's Aid written evidence to Scottish Parliament Equality and Human Rights Committee Inquiry into Destitution, Asylum and Insecure Immigration Status in Scotland, March 2017

A national from South East Asia was married to a UK national and has three young children. She recently left the family home due to domestic abuse. She has no recourse to public funds and is therefore not entitled to any benefits at present. However, she can apply for a destitution domestic violence concession which would allow her to claim benefits for up to three months while UK immigration considers her application to settle in the UK. #591

Women who have no entitlement to housing benefit are also often unable to access refuges. Refuges are dependent on housing benefit for their income to cover the cost of accommodation.

Recommendations

For the Scottish Welfare Fund

- ☐ ensure all staff have been trained in domestic abuse, for example to develop an understanding that some people will have to make several applications to the SWF if they are forced to move several times by their abusive partner
- ☐ encourage staff to refer to the SWF guidance in decision making
- ☐ process applications from people experiencing domestic abuse as a priority

For Scottish Government

- ☐ consider eligibility criteria for devolved benefits for people who have experienced domestic abuse who may not be entitled to a qualifying benefit, for example because they have not been able to establish a right to reside
- ☐ Prioritise the creation of a new 'Destitution Fund' for women experiencing domestic abuse unable to access other sources of help to mitigate the impact of restrictions on access to public funds for those with insecure immigration status and European Economic Area migrant women experiencing domestic abuse, as recommended by the Scottish Parliament's Equalities and Human Rights Committee⁴
- ☐ develop a timetable for bringing forward regulations/work with DWP to enable women's financial independence and remove enablement of financial control provided by single household payment of universal credit

⁴ Hidden Lives – New Beginnings: Destitution, asylum and insecure immigration status in Scotland – report by Equalities and Human Rights Committee, May 2017

For DWP and local authorities

- ☐ improve guidance regarding people who have moved in with family or friends having left domestic abuse so that housing costs contributions or non-dependant deductions are not applied to any temporary housing arrangements
- ☐ waive recovery of overpayments while people are staying in refuge or temporary accommodation and consider use of their discretion to write off any overpayments to prevent hardship

For universal credit

- ☐ ensure all work coaches have undertaken domestic abuse training and have access to expert support
- ☐ extend period to repay advances from one to two years for anyone who experienced domestic abuse
- ☐ provide information about what to do if you don't have a bank account at the point of claim

☐ currently payment can be made once to someone else's bank account on one occasion. Extend this for people who have left domestic abuse and may not be able to set up a bank account immediately or make use of the simple payment service using the paypoint scheme.

☐ reduce or widen the criteria that determines which people leaving domestic abuse may be exempted from work-related requirements for 13/26 weeks and extend this period

☐ ensure that people leaving domestic abuse do not lose transitional protection for UC by virtue of the change in their circumstances or because they were staying in temporary accommodation or a refuge.

For the two child limit

☐ end the two-child limit. It breaks the link between the assessment of children's needs and the support they receive. Further information can be found in CPAG's policy briefing on the two-child limits

☐ While the two-child limit continues to be applied, the exemption for children conceived without consent should be extended to apply to all children and not only third and subsequent children.

⁵ A report on the two child limit, CPAG in Scotland's Early Warning System, July 2018

⁶ this could be done by inserting 'a person who does not have a right to reside or leave to remain, who meets the conditions of regulation 98(3)' in regulation 9(4) of the Universal Credit Regulations 2013 and reg 10(3B) Housing Benefit Regulations 2006

For people from abroad

☐ waive the 3 month restriction for UK nationals returning from abroad following domestic abuse

☐ extend the destitution domestic violence concession to include people who came to the UK on different visas, not solely spousal visas, or EU nationals who would not have needed a visa

☐ entitle people escaping domestic abuse access to universal credit (and housing benefit for temporary accommodation or refuge) for 13 weeks – 26 weeks if they are the primary carer of a child⁶

For further information on the content of this briefing, please contact:

redacted-38(1)(b)

October 2018

Fund to leave – Development Paper

Background

- Women's pre-existing economic inequality means they have fewer financial resources, capital /savings and more existing debt.
- Women's disadvantaged position in the labour market, including part-time, insecure and/or low-paid employment and unpaid care work, has a direct impact on their incomes and poverty.
- Women's caring responsibilities, interrupted employment patterns, and lower incomes make them more reliant on social security, with women twice as likely to be reliant on social security as men.

- Single parents (95% women), BME women and disabled women have been particularly impacted by the social, economic, and labour market implications of the pandemic.²³
- Women who lived in households that earned less than £10,000 were more than four times as likely (14.3%) to have experienced partner abuse in the last 12 months than women living in households with an income of £50,000 or more (3.3%).²⁴
- In line with the recent response to Scotland ending food bank usage ‘Cash First’²⁵, this solution is about providing a cash solution; which is more empowering, allows for broader range of solutions to be sought than vouchers, and treats people in need with dignity.

Recommendation - Financial support for women experiencing domestic abuse

The Scottish Government should explore options for a dedicated support fund, or entitlements with clear guidance and capable of delivering short-term recurring payments, to support women leaving an abusive partner. This should include essential crisis costs to enable a woman to leave and to bridge the gap between leaving and the first Universal Credit payment.

It is important that such a fund is quickly accessible to victims, with as little paper trail in terms of a perpetrator knowing of the fund, or having information on where a victim is. It will also be important to have solutions for women who have no bank account, or no access to their bank account. We need a solution that works across urban and rural locations, and to build in a monitoring and recording system that is not burdensome, but allows us to learn in terms of what works over time. Key to the implementation of this will be around awareness of the fund existing too. The fund should be extremely useful in terms of the monies offered, as well as may provide other general support, as well as housing support, and financial support; it could include possibilities for working with new partners, including financial institutions.

Considerations	Questions	Thoughts	Other info
Name	<p>Fund to leave doesn't seem appropriate.</p> <p>What should this fund be called?</p>	<ul style="list-style-type: none"> • redacted-30(b)(i) 	<p>Already in place (don't want to confuse):</p> <ul style="list-style-type: none"> • Discretionary Housing Payment (DHP) • Scottish Welfare Fund – Crisis grants and Community Care Grants (CCGs) • Self-Directed Support (SDS)

²³ <https://www.engender.org.uk/content/publications/Close-the-Gap-and-Engender-Joint-Briefing-on-the-impact-of-COVID-19-on-women-with-childcare-responsibilities-in-Scotland.pdf>

²⁴ <https://womensaid.scot/wp-content/uploads/2022/09/SWA-Briefing-the-cost-of-living-crisis-Sept-22.pdf>

²⁵ <https://www.gov.scot/publications/cash-first-towards-ending-need-food-banks-scotland/>

			<ul style="list-style-type: none"> • Hardship Grant / Fund • Emergency Flee Fund (TSB)
Cost	redacted–30(b)(i)	redacted–30(b)(i)	<ul style="list-style-type: none"> • Personalised budgets: (initially 2010 up to 3k per person, average spent £794)²⁶ • CCG average 20/21: £692²⁷ • Crisis Grant average 20/21: £115²⁸ • Hardship Grant/ Fund: usually £500²⁹ • TSB Emergency Flee fund: Up to £500³⁰ • English / Welsh equivalent to fund is £250 / £500³¹
Considerations	Questions	Thoughts	Other info
Support	<p>Should this fund also come with access to specialist support, including reducing financial related control that still may exist?</p> <p>Also, referrals to appropriate support?</p>	<p>What protocols needs to be put in place, and with which organisations?</p> <p>Does this also give opportunities to help in terms of setting up bank accounts, etc.?</p> <p>Safe Spaces (domestic abuse spaces) are already in banks and pharmacies.</p> <p>It would be great to link it in with at least the SWA domestic abuse helpline number.</p>	<ul style="list-style-type: none"> • Someone may not wish to take up support initially, so this should be about opportunities in terms of offering support and engagement, rather than there being a prerequisite that support is taken to receive the money.

²⁶ <https://www.jrf.org.uk/report/providing-personalised-support-rough-sleepers>

²⁷ <https://www.gov.scot/binaries/content/documents/govscot/publications/statistics/2022/07/scottish-welfare-fund-statistics-annual-update-2021-222/documents/scottish-welfare-fund-statistics-annual-update-2021-22/scottish-welfare-fund-statistics-annual-update-2021-22/govscot%3Adocument/scottish-welfare-fund-statistics-annual-update-2021-22.pdf>

²⁸ <https://www.gov.scot/binaries/content/documents/govscot/publications/statistics/2022/07/scottish-welfare-fund-statistics-annual-update-2021-222/documents/scottish-welfare-fund-statistics-annual-update-2021-22/scottish-welfare-fund-statistics-annual-update-2021-22/govscot%3Adocument/scottish-welfare-fund-statistics-annual-update-2021-22.pdf>

²⁹ <https://www.citizensadvice.org.uk/benefits/universal-credit/sanctions/hardship-payment/>

³⁰ <https://www.tsb.co.uk/supporting-you-domestic-or-financial-abuse/>

³¹ <https://www.womensaid.org.uk/excellent-start-as-government-announces-pilot-of-emergency-fund-for-domestic-abuse-survivors/>

	<p>Comment:</p> <p>Referrals to welfare rights as well</p>	<p>There is also an opportunity to link in with housing.</p> <p>At the point of fleeing, a woman (and family) can be at more risk than ever, and so this must be considered in terms of support offered, as well as how this can be accessed.</p> <p>All household members should be considered in terms of the support on offer...for example, the children.</p> <p>There should be support that links to LGBTQ agencies.</p> <p>We need to consider BME support.</p> <p>Links to security measures and how to put these in place would help.</p>	<ul style="list-style-type: none"> When considering the support, we should seek the views from Survivors in terms of useful resources and places to link in with; this might differ from one area to another. We may also find that rural and urban are different.
Considerations	Questions	Thoughts	Other info
Fund Criteria	redacted-30(b)(i)	<ul style="list-style-type: none"> redacted-30(b)(i) 	<ul style="list-style-type: none"> 57% of the people on Universal Credit in April 2023 were women³² <p>redacted-30(b)(i)</p>
Delivery method	redacted-30(b)(i)	redacted-30(b)(i)	Recent qualitative views around help at the point of fleeing is a request from survivors to keep systems as simple as possible.
Pilot/Test of Change	Where do we focus the pilot?	redacted-30(b)(i)	redacted-30(b)(i)
Systems	Can we use existing IT systems or do new ones need to be set up?	<p>What have England / Wales done?</p> <p>What have any of the prevention funds done?</p>	<ul style="list-style-type: none"> We need a system that has the opportunity to monitor and record.

³² <https://www.gov.uk/government/statistics/universal-credit-statistics-29-april-2013-to-13-april-2023/universal-credit-29-april-2013-to-13-april-2023>

		<p>Could it link in with SWF, or DHP? (ringfenced) Comment:</p> <p>Theoretically it could be - but evidence tells us these funds have been failing people experiencing domestic abuse.</p> <p>DHPs are not suitable for everyone - they are limited to people who are already getting housing benefit or the housing element of universal credit - which will rule out anyone not getting benefits at the point they leave until they have accommodation set up. This is a gap in support that we hope this new fund can help fill.</p> <p>SWF budgets are increasingly under pressure. CCG applications tend not to be fast. I'll attach the report on this I wrote a while back</p>	<ul style="list-style-type: none"> • We need a system that is fast. • We need a system that doesn't require a bank account in place.
Data	<p>How do we collect relevant and useful data?</p> <p>Do we need data sharing agreements?</p>	redacted-30(b)(i)	
Outcomes	<p>What outcomes do we want to see and how will this be monitored</p>	redacted-30(b)(i)	
Evaluation	<p>This needs to be evaluated so we have something to present for evidence of impact.</p>	<p>Can this be done as part of the delivery mechanism?</p>	
Lived experience input	<p>How do we best get involvement of women with lived experience?</p>	<p>SWA has a survivor participation group.</p>	
Raising awareness	<p>How do we promote the fund? Comment:</p>	<p>A recent survivor focus group said that one of the most useful places to read about DA help is the back of public toilet doors.</p>	

	Info available in different languages	Support Teams will be a useful resource in terms of promotion too; RRTP group, etc. The VAWG networks. Public transport. Universities and higher education buildings.	
Migrant women and women with NRPF	What are the implications for someone with NRPF? Comment: This will require immigration advice		
Unintended Consequences	Will this fund effect the recipients benefits or tax? Comment: Not if DWP agree - SWF, DHPs, Scottish child payment etc are all ignored for the purposes of UC. Someone on SG reserved benefits team should be able to advise the process for ensuring the fund does not impact on other benefits		
Others	What role can the banks play What happens if someone doesn't have a bank account? Can someone receive cash?		

Fund to leave development – Stakeholder engagement

Stakeholders		
Scottish Government		
redacted–38(1)(b)	Equality Unit - VAWG	redacted–38(1)(b)
redacted–38(1)(b)	G/T team	redacted–38(1)(b)
redacted–38(1)(b)	PRS team	redacted–38(1)(b)
redacted–38(1)(b)	RSL team	redacted–38(1)(b)
redacted–38(1)(b)	Social Security – Reserved Benefits team	redacted–38(1)(b)
redacted–38(1)(b)	Asylum and Refugee Integration team	redacted–38(1)(b)
External		
redacted–38(1)(b)	COSLA	redacted–38(1)(b)
redacted–38(1)(b)	COSLA	redacted–38(1)(b)
redacted–38(1)(b)	COSLA	tbc
redacted–38(1)(b)	Improvement Service	redacted–38(1)(b)
redacted–38(1)(b)	ALACHO	redacted–38(1)(b)
redacted–38(1)(b)	ALACHO	redacted–38(1)(b)
redacted–38(1)(b)	SOLACE	redacted–38(1)(b)
?	HO Hub rep	
	Mecopp – get details from redacted–38(1)(b)	
redacted–38(1)(b)	SWA	redacted–38(1)(b)
	Reps from local WA groups?	
redacted–38(1)(b)	CIH	redacted–38(1)(b)
redacted–38(1)(b)	Engender	redacted–38(1)(b)
redacted–38(1)(b)	CPAG	redacted–38(1)(b)
?	Change team rep – ask redacted–38(1)(b)	
redacted–38(1)(b)	Amina – The Muslim Women’s Resource Centre (MWRC)	redacted–38(1)(b)

redacted–38(1)(b)	Cyrenians - Cyrenians launch new housing initiative to help women and children fleeing domestic abuse STV News	
redacted–38(1)(b)	Wheatley Group Rep	redacted–38(1)(b)
redacted–38(1)(b)	Dundee City Council	
?	East Lothian Council	

Meetings	
Researchers	
DWP	
HMRC	
Procurement Team	
Third sector team	

ANNEX A

redacted–30(b)(i)

Universal Credit Amounts Monthly Rate³³	Rates 2022/23 (£)	Rates 2023/24 (£)
Standard allowance – Single		
Single under 25	265.31	292.11
Single 25 or over	334.91	368.74
Child amounts		
First child (born prior to 6 April 2017)	290.00	315.00
First child (born on or after 6 April 2017)/ second child and subsequent child (where an exception or transitional provision applies)	244.58	269.58

4. The Housing Element of UC will usually cover the cost of rent in the social sector, but in the private rented sector claimants are subject to local housing allowance (LHA). The monthly LHA is based on size and location of accommodation and in Scotland range from the lowest rate at £260 for a room in Dumfries and Galloway to the highest rate at £1,695 for 4 bedrooms in the Lothians³⁴. Single people under 35 years old are only eligible for a single room rate.

³³ [Benefit and pension rates 2023 to 2024 - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

³⁴ [Scotland: Universal Credit Local Housing Allowance monthly rates 2023 to 2024 - GOV.UK \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

5. These amounts are also subject to the bedroom tax and benefit cap, which can be mitigated via claiming DHPs. These figures are for illustration purposes to indicate our intention to use as the basis of cost analysis.

Email from CPAG with DHP info – 07/08/2023

From: redacted-38(1)(b)

Sent: 07 August 2023 11:38

To: redacted-38(1)(b)

Cc: redacted-38(1)(b)

Subject: RE: Fund to leave - development paper - version 2 - July 2023 (A44478445)

Attachments: Can DHPs be paid if no UC or HB (leaving safely).docx

Hello

I have been working on who can and who cannot get a discretionary housing payment to help with a deposit or rent in advance at the beginning on a tenancy for other Scottish Government colleagues, but I think it is also important in relation to the development of this fund. redacted-38(1)(b) and redacted-38(1)(b) please keep me right if my examples are unrealistic or if there is other support I am not aware of.

The question I was asked was could someone who is not currently getting housing benefit, or the housing element of universal credit get a discretionary housing payment for a deposit for a private let? In short, my answer was no (I have attached a longer explanation). For example:

Peri is planning to leave her husband and needs to move close to her sister for help with childcare. There is no social rented housing close by, but she has found a private let. She needs to help to pay the deposit and rent in advance. She is not currently getting benefits so will not be able to get a discretionary housing payment.

Donna Marie is also planning to leave her husband and move close to her sister for help with childcare. Likewise, there is no social rented housing close by but she has found a private let. She is currently getting help to pay the rent in her current home through universal credit, so she can get a discretionary housing payment to help with the deposit and rent in advance.

Peri was not able to pay the deposit for the private let, but had to leave her husband quickly, so moved into a refuge. She got housing benefit to help pay her rent in the refuge. This means she could now get a discretionary housing payment for a deposit for a private let close to her sister.

You cannot get help with a deposit or rent in advance from the Scottish Welfare Fund. You can only get a budgeting loan/advance if you have been getting universal credit or one of the benefits it is replacing (not tax credits or housing benefit) for six months or more.

[Crisis have a database of schemes](#) that can help to pay or guarantee a deposit. The delivery and eligibility for these schemes appears to vary between local authorities and is not easy to find. I don't know how effective these schemes are – you'll have more knowledge than me about whether these can effectively support someone leaving abuse?

If there isn't other support readily available, is this something we should be building into the fund?

Best wishes

redacted-38(1)(b)

| Child Poverty Action Group in Scotland | Unit 9 | Ladywell Business Centre | 94 Duke Street | Glasgow | G4 0UW

redacted-38(1)(b)

| Main: 0141 552 3303

redacted-38(1)(b)

| Website: cpag.org.uk/scotland

redacted-38(1)(b)

Subscribe to hear more about CPAG in Scotland: receive regular ebulletins on a variety of different topics such as; e-news; training, events and publications; tax credits and early years; students and benefits; BME communities; Cost of the School Day and more.

Question- A homeless person needs a deposit but is not getting housing benefit or the housing element of UC because they have no housing costs. Could they get a discretionary housing payment (DHP)?

Answer – No. When DHPs were devolved, the legislation restricted payment of DHPs to people who are getting housing benefit or help to pay their rent through another benefit.

[The Scotland Act 1998](#) sets out the legislative competence of the Scottish Parliament. Rather than listing the matters over which the Scottish Parliament does control (devolved powers), it specifies the matters over which it does not (reserved matters).

The reserved matters are listed in [schedule 5](#), including social security under Head F, but there is also a list of exceptions. The list of exceptions was added to by [the Scotland Act 2016](#) which devolved some social security powers to the Scottish government, including [discretionary housing payments](#) (DHPs). These are covered in exception 6. This allowed the Scottish government to legislate for devolved DHPs, which it did in part 5 of the [Social Security \(Scotland\) Act 2018](#).

In summary, exception 6(a) says Scottish Ministers can provide financial assistance (DHPs) to an individual who is entitled to housing benefit or another reserved benefit to help meet housing costs.

What we see in section 88 of the Social Security (Scotland) Act was constrained by the Scotland Act 1998.

88 Local authorities' power to make payments

(1) A local authority has power to give financial assistance to a qualifying individual to meet, or help towards meeting, the individual's housing costs.

(2) In subsection (1), "qualifying individual" means an individual who—

(a) is entitled to—

(i) housing benefit, or

(ii) an award of universal credit which includes an amount for rent, and

(b) appears to the authority to need financial assistance under subsection (1) (in addition to any assistance of a kind mentioned in paragraph (a) which the individual receives) in order to meet housing costs.

Other sources of support

[Scottish welfare fund guidance](#) - excluded item 7 - specifically excludes 'rent in advance, including rent deposits, which can be paid by budgeting loans or DHPs.'

We've already established DHP's can't be used if the individual is not already getting housing benefit or the housing element of UC already.

[Budgeting loans/advances](#) are only available to people who have been getting UC, JSA, ESA, or IS for 6 months or more. They are subject to maximum amounts and must be paid back.

- £348 single person
- £464 couple
- £812 children in household

This means there will be people excluded from taking a budgeting advance too.

Rent deposit/guarantee schemes

[Crisis have a database of schemes](#) that can help to pay or guarantee a deposit. The delivery and eligibility for these schemes appears to vary between local authorities and is not easy to find.

This is where it falls out of my area of expertise – I don't know how effective these schemes are.

Core Brief

TOP LINES

31 March 2023: UKG confirmed they are trialling a new approach to supporting victims with a flexible fund of £300k, which will provide one-off payments of £250 to victims of domestic abuse, rising to £500 where a victim has children.

18 December 2022: The Observer and the Guardian report on Scottish Women's Aid's calls for a Leaving Fund for domestic abuse victims.

9 December 2022: TSB announced its 'Emergency Flee Fund' for domestic abuse victims, which will offer existing customers who are impacted by domestic abuse an 'Emergency Flee Fund' payment of up to £500 to help escape an abusive relationship. Scottish TSB customers could take advantage of this scheme.

8 December 2022: BBC News report on Scottish Women's Aid campaign to urge the Scottish Government to "keep its promises to people experiencing abuse.

25 November 2022: As part of its media activity around 16 days of Activism, Scottish Women's Aid has called on the Scottish Government to "keep its promises" to people experiencing domestic abuse during the Cost of Living Crisis – including establishing a leaving fund.

We know there can be many barriers preventing someone who is experiencing domestic abuse from leaving that relationship

- We are firmly committed to looking at what we can do, within our devolved powers, to provide financial support to women so that financial uncertainty does not create a further barrier.

- We are currently working with partners, including Scottish Women’s Aid (SWA), the Convention Of Scottish Local Authorities (COSLA) and Child Poverty Action Group (CPAG) to explore how a fund providing immediate financial support to women leaving an abusive relationship could be developed and delivered.
- However, we are clear that no-one should have to endure domestic abuse and that help and support is available 24 hours a day, 7 days a week on Scotland’s Domestic Abuse and Forced Marriage Helpline on 0800 0271234.

PREVENTING HOMELESSNESS

Supporting victim-survivors of domestic abuse with regards to their housing needs continues to be a priority

- Domestic abuse is one of the most common reasons for women applying for homelessness assistance. In 2022/23, 3,805 out of 17,100 women making a homelessness application cited the reason as due to ‘dispute within household: violent or abusive’ which equates 22% of all women seeking homelessness assistance.
- That is why we commissioned a working group to look at the actions needed to prevent homelessness for women and children experiencing domestic abuse.
- The report, *Improving Housing Outcomes for Women and Children experiencing Domestic Abuse in the social rented sector*, was published in December 2020.
- We are firmly committed to implementing all 27 of the report’s recommendations including exploring options around a dedicated fund to support women to leave an abusive partner.
- out of scope

Development Paper – Version 2

Fund to leave – Development Paper

Background

- Women’s pre-existing economic inequality means they have fewer financial resources, capital /savings, less access to pensions, and more existing debt.
- Women’s disadvantaged position in the labour market, including part-time, insecure and/or low-paid employment, underemployment, and unpaid care work, has a direct impact on their incomes and poverty.
- Systemic gender issues, including women’s caring responsibilities, violence against women, gendered health inequalities, interrupted employment patterns, lower incomes, mean that women are more reliant on social security, with women twice as likely to be reliant on social security as men.
- Single parents (92% women), BME women and disabled women have been particularly impacted by the social, economic, and labour market implications of the pandemic.³⁵
- Women who lived in households that earned less than £10,000 were more than four times as likely (14.3%) to have experienced partner abuse in the last 12

³⁵ <https://www.engender.org.uk/content/publications/Close-the-Gap-and-Engender-Joint-Briefing-on-the-impact-of-COVID-19-on-women-with-childcare-responsibilities-in-Scotland.pdf>

months than women living in households with an income of £50,000 or more (3.3%).³⁶

- In line with the recent response to Scotland ending food bank usage ‘Cash First’³⁷, the fund to leave is about providing a cash solution; which is more empowering and allows for a broader range of solutions to be sought than vouchers, and treats people in need with dignity.

Recommendation

Financial support for women experiencing domestic abuse

The Scottish Government should explore options for a dedicated support fund, or entitlements with clear guidance and capable of delivering short-term recurring payments, to support women leaving an abusive partner. This should include essential crisis costs to enable a woman to leave and to bridge the gap between leaving and the first Universal Credit payment.

It is important that such a fund is quickly accessible to people at the time they feel ready to leave and can be accessed without the knowledge of the perpetrator and with appropriate safeguards to ensure they are not provided with information on the applicants location. It will also be important to have options appropriate for women who have no bank account, or no access to their own bank account. The fund must also work in both urban and rural locations, and include a monitoring and recording function that is not burdensome for any party, and allows partners to learn what is effective. Raising awareness of the fund will be critical.

The funding will come from Ending Homelessness Together so must support the prevention of homelessness for those at risk due to experiencing domestic abuse. This pilot will test how useful the fund will be in terms of the monies offered, but will also test what other support and signposting, such as benefits and VAWG specialist support can be provided under the terms of this fund, it could include possibilities for working with new partners, including financial institutions.

Considerations	Questions	Thoughts	Other info
Name	<p>Is Fund to leave appropriate?</p> <p>What should this fund be called?</p>	redacted-30(b)(i)	<p>Already in place (don't want to confuse):</p> <ul style="list-style-type: none"> • Discretionary Housing Payment (DHP) • Scottish Welfare Fund –Community Care Grants (CCGs) and Crisis grants • BRC Hardship Fund • Self-Directed Support (SDS) • UC Hardship Grant / Fund • TSB Emergency Flee Fund

³⁶ <https://womensaid.scot/wp-content/uploads/2022/09/SWA-Briefing-the-cost-of-living-crisis-Sept-22.pdf>

³⁷ <https://www.gov.scot/publications/cash-first-towards-ending-need-food-banks-scotland/>

			<ul style="list-style-type: none"> • Victims will benefit from key support - gov.scot (www.gov.scot) • Support for Migrant Victims • VSS Emergency Assistance Fund - Victim Support Scotland • Victims' Fund extends its reach to women in Commercial Sexual Exploitation - Victim Support Scotland
Cost	redacted-30(b)(i)	redacted-30(b)(i)	<ul style="list-style-type: none"> • Personalised budgets: (initially 2010 up to 3k per person, average spent £794)³⁸ • Scottish Welfare Fund <ul style="list-style-type: none"> ○ CCG average 20/21: £692³⁹ ○ Crisis Grant average 20/21: £115⁴⁰ • UC Hardship Grant/ Fund: usually £500⁴¹ • TSB Emergency Flee fund: Up to £500⁴² • English / Welsh equivalent to fund is £250 / £500⁴³
Considerations	Questions	Thoughts	Other info
Support	<p>Should this fund also come with access to specialist support, including reducing financial related control that still may exist?</p> <p>What additional costs will providing</p>	<p>What protocols needs to be put in place, and with which organisations?</p> <p>Does this also give opportunities to help in terms of setting up bank accounts, etc.?</p> <p>Safe Spaces (domestic abuse spaces) are already in banks and pharmacies.</p>	<ul style="list-style-type: none"> • Someone may not wish to take up support initially, so this should be about opportunities in terms of offering support and engagement, rather than there being a prerequisite that support is taken to receive the money. • When considering the support, we should seek the views from Survivors in terms of useful resources and places to link in with; this might differ from one area to another. We may also find that rural and urban are different

³⁸ <https://www.jrf.org.uk/report/providing-personalised-support-rough-sleepers>

³⁹ <https://www.gov.scot/binaries/content/documents/govscot/publications/statistics/2022/07/scottish-welfare-fund-statistics-annual-update-2021-222/documents/scottish-welfare-fund-statistics-annual-update-2021-22/scottish-welfare-fund-statistics-annual-update-2021-22/govscot%3Adocument/scottish-welfare-fund-statistics-annual-update-2021-22.pdf>

⁴⁰ <https://www.gov.scot/binaries/content/documents/govscot/publications/statistics/2022/07/scottish-welfare-fund-statistics-annual-update-2021-222/documents/scottish-welfare-fund-statistics-annual-update-2021-22/scottish-welfare-fund-statistics-annual-update-2021-22/govscot%3Adocument/scottish-welfare-fund-statistics-annual-update-2021-22.pdf>

⁴¹ <https://www.citizensadvice.org.uk/benefits/universal-credit/sanctions/hardship-payment/>

⁴² <https://www.tsb.co.uk/supporting-you-domestic-or-financial-abuse/>

⁴³ <https://www.womensaid.org.uk/excellent-start-as-government-announces-pilot-of-emergency-fund-for-domestic-abuse-survivors/>

	<p>different levels of support need? Is signposting enough?</p> <p>Also, need to consider referrals to appropriate support and the costs involved in this as well as data collecting and data sharing issues ?</p> <p>Comments: CPAG - Referrals to welfare rights as well</p>	<p>It would be great to link it in with at least the SWA domestic abuse helpline number.</p> <p>There is also an opportunity to link in with housing.</p> <p>At the point of leaving, a woman (and family) can be at more risk than ever, and so this must be considered in terms of support offered, as well as how this can be accessed.</p> <p>All household members should be considered in terms of the support on offer...for example, the children and/or other caring responsibilities.</p> <p>There should be support that links to LGBTQ agencies.</p> <p>We need to consider BME support.</p> <p>Comment: Engender - Needs of disabled women also crucial - accessibility of info/support in terms of different impairments (also impacting the costs of leaving) and for learning disabled/ ND women</p> <p>Links to security measures and how to put these in place would help.</p> <p>If providing support costs additional expenditure this will impact the amount available from the fund to give to women</p>	<p>Comments: Engender - Consideration of intersectionality is vital here - cultural competence, language, accessibility, inclusion. Also age in relation to targeting/ take up. All of this support work must be in line with best standards re. trauma</p> <p>Help to Rent Database (crisis.org.uk)</p>
Considerations	Questions	Thoughts	Other info

Fund Criteria	<ul style="list-style-type: none"> redacted–30(b)(i) 	redacted–30(b)(i)	<ul style="list-style-type: none"> ○ 57% of the people on Universal Credit in April 2023 were women⁴⁴ redacted–30(b)(i)
Delivery method	redacted–30(b)(i)	redacted–30(b)(i)	<p>Recent qualitative views around help at the point of fleeing is a request from survivors to keep systems as simple as possible.</p> redacted–30(b)(i)
Pilot/Test of Change	<p>Where do we focus the pilot?</p> redacted–30(b)(i)	redacted–30(b)(i)	<ul style="list-style-type: none"> • redacted–30(b)(i).
Systems	<p>Can we use existing IT systems or do new ones need to be set up?</p> <p>how can the existing systems (for data? Processing? Recording? Etc) be used to maximum efficiency in a proportionate way within the limitations of this project</p> <p>Needs to be quick and easy</p>	<p>What have England / Wales done?</p> redacted–30(b)(i) <p>Could it link in with SWF, or DHP? (ringfenced)</p> <p>Comment:</p> <p>CPAG - Theoretically it could be - but evidence tells us these funds have been failing people experiencing domestic abuse.</p> <p>DHPs are not suitable for everyone - they are limited to people who are already getting housing benefit or the housing element of universal credit - which will rule out anyone not getting benefits at the point they leave until they have accommodation set up. This is a gap in support that we hope this new fund can help fill.</p> <p>SWF budgets are increasingly under pressure. CCG applications tend not to be fast. I'll attach the report on this I wrote a while back</p> redacted–30(b)(i)	<ul style="list-style-type: none"> • We need a system that has the opportunity to monitor and record. • We need a system that is fast. This includes human resource and capacity. • We need a system that doesn't require a bank account in place.
Data	<p>How do we collect relevant and useful data?</p> <p>Comment:</p>	redacted–30(b)(i)	<p>Need to capture if someone is accessing the fund more than once</p>

⁴⁴ <https://www.gov.uk/government/statistics/universal-credit-statistics-29-april-2013-to-13-april-2023/universal-credit-29-april-2013-to-13-april-2023>

	<p>Engender - As much equalities data as possible (without infringing anonymity in rural areas) will be very useful for building evidence and informing us about need for certain groups - useful for subsequent targeting/outreach</p> <p>What data do we need to collect for governance and evaluation? (speak to stats team)</p> <p>Do we need data sharing agreements?</p>	<p>Comment: CPAG - It is possible they might have good reason to access the fund more than once, this should be built into the guidance</p>	
<p>Outcomes</p>	<p>What outcomes do we want to see and how will this be monitored</p> <p>Comment:</p> <p>Engender - Key outcome should be equally accessible by marginalised groups, after weighting for differentials like likelihood of poverty.</p> <p>SWA may be able to suggest outcome akin to cost of living crisis data - e.g. WAE report showing that 73% surveyed said they would be unable to leave abusive partner for financial reasons</p>	<p>redacted-30(b)(i)</p>	<p>redacted-30(b)(i)</p>

	Possible logic modelling required?		
Evaluation	<p>This needs to be evaluated so we have something to present for evidence of impact.</p> <p>Will the evaluation be published?</p>	<p>Can this be done as part of the delivery mechanism?</p> <p>Be clear on the expectations of the evaluation</p>	
Lived experience input	How do we best get involvement of women with lived experience?	<p>SWA has a survivor participation group.</p> <p>Change team (speak to redacted-38(1)(b))</p> <p>What other stakeholders can input into this?</p>	SWA focus group – redacted-38(1)(b) to try and set up for end of August?
Raising awareness	<p>How do we promote the fund?</p> <p>Comment: CPAG - Info available in different languages Engender - culturally competent, trauma-informed, LGBTI inclusive, gender-sensitive, accessible.</p> <p>Also need to consider where the budget for this comes from. We don't have a comms budget so it will need to come from the fund itself or rely on social media</p>	<p>A recent survivor focus group said that one of the most useful places to read about DA help is the back of public toilet doors.</p> <p>Support Teams will be a useful resource in terms of promotion too; RRTP group, etc.</p> <p>The VAWG networks.</p> <p>Public transport.</p> <p>Universities and higher education buildings.</p>	
Migrant women and	What are the implications for	redacted-30(b)(i)	Amina have a hardship fund for women in financial crisis, which takes a lot to administer and also has a strict criteria.

women with NRPF	someone with NRPF?		
Unintended Consequences	<p>Will this fund effect the recipients benefits or tax? Comments: CPAG - Not if DWP agree - SWF, DHPs, Scottish child payment etc are all ignored for the purposes of UC. Someone on SG reserved benefits team should be able to advise the process for ensuring the fund does not impact on other benefit Engender - Survivor participation group or similar lived experience input will also be important here</p>	<p>Need to ensure appropriate safeguards so that the perpetrator does not receive information</p> <p>To ask about options for best and appropriate contact – consider using bright sky app which hides info on phones</p> <p>Statutory services may remove support if receiving this fund. i.e social work</p>	Awaiting advice from HMRC and DWP
Others	<p>What role can the banks play? And other financial institutions, post office, building society, credit union</p> <p>What happens if someone doesn't have a bank account?</p> <p>Can someone receive cash?</p>	<p>Comment: COSLA - Paypoint may be an option, (however higher value payments can sometimes exceed small shop's available float that they carry in their tills.</p>	
What happens after the pilot?	Need to risk assess including the impact of continuing and not continuing		

Fund to leave development – Stakeholder engagement

Stakeholders		
Scottish Government		
redacted-38(1)(b)	Equality Unit - VAWG	redacted-38(1)(b)
redacted-38(1)(b)	G/T team	redacted-38(1)(b)
redacted-38(1)(b)	PRS team	redacted-38(1)(b)
redacted-38(1)(b)	RSL team	redacted-38(1)(b)
redacted-38(1)(b)	Social Security – Reserved Benefits team	redacted-38(1)(b)
redacted-38(1)(b)	Asylum and Refugee Integration team	redacted-38(1)(b)
External		
redacted-38(1)(b)	COSLA	redacted-38(1)(b)
redacted-38(1)(b)	COSLA	redacted-38(1)(b)
redacted-38(1)(b)	COSLA	tbc
redacted-38(1)(b)	COSLA	redacted-38(1)(b)
redacted-38(1)(b)	Improvement Service	redacted-38(1)(b)
redacted-38(1)(b)	ALACHO	redacted-38(1)(b)
redacted-38(1)(b)	ALACHO	redacted-38(1)(b)
redacted-38(1)(b)	SOLACE	redacted-38(1)(b)
?	HO Hub rep	
redacted-38(1)(b)	MECOPP	redacted-38(1)(b)
redacted-38(1)(b)	SWA	redacted-38(1)(b)
	Reps from local WA groups?	
redacted-38(1)(b)	CIH	redacted-38(1)(b)
redacted-38(1)(b)	SFHA	redacted-38(1)(b)
redacted-38(1)(b)	Engender	redacted-38(1)(b)
redacted-38(1)(b)	CPAG	redacted-38(1)(b)
?	Change team rep – ask redacted-38(1)(b)	
redacted-38(1)(b)	Amina – The Muslim Women’s Resource Centre (MWRC)	redacted-38(1)(b)
redacted-38(1)(b)	Shakti Women’s Aid	redacted-38(1)(b)
redacted-38(1)(b)	Cyrenians - Cyrenians launch new housing initiative to help women and children fleeing domestic abuse STV News Cyrenians partners with Women in Safe Homes fund 	

	Scottish Housing News	
redacted-38(1)(b)	Crisis	redacted-38(1)(b)
redacted-38(1)(b)	Shelter?	
redacted-38(1)(b)	Wheatley Group Rep	redacted-38(1)(b)
redacted-38(1)(b)	Dundee City Council	
redacted-38(1)(b)	East Lothian Council	
redacted-38(1)(b)	LGBT Youth	redacted-38(1)(b)
	Women are at greater risk of homelessness and abuse - Govan Law Centre 0800 043 0306	

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redacted-30(b)(i)

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⁴⁵ [Benefit and pension rates 2023 to 2024 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/benefit-and-pension-rates-2023-to-2024)

⁴⁶ [Scotland: Universal Credit Local Housing Allowance monthly rates 2023 to 2024 - GOV.UK \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/scotland/universal-credit-local-housing-allowance-monthly-rates-2023-to-2024)