

Alison McGovern MP  
Minister of State for Local Government and Homelessness  
Ministry of Housing, Communities & Local Government  
2 Marsham Street  
London  
SW1P 4DF

CC: Florence Eshalomi MP, Chair of the Housing Communities and Local Government Select Committee and Sarah Owen MP, Chair of the Women and Equalities Select Committee

Monday 9<sup>th</sup> March 2026

**Women's homelessness not adequately addressed in National Plan to End Homelessness: we must turn the tide on inequitable practices, policies and systems**

Dear Minister McGovern,

We are writing as the National Women's Homeless Coalition alongside the National Domestic Abuse and Housing Policy and Practice Group. We welcome this Government's commitment to ending homelessness and the ambitious plans set out in the landmark National Plan to End Homelessness. However, we have serious concerns that the National Plan does not address the unique challenges and risks that women face when homeless. We would welcome the opportunity to meet with you to discuss how we can work together to ensure the implementation of the National Plan achieves our shared goal of ending homelessness for women.

Women's homelessness is systematically under-recorded, under-responded to, and too often rendered invisible by policies and practices designed around predominantly male experiences of homelessness. This invisibility is compounded by racism, transphobia and ableism, which intensify exclusion for the most marginalised women.

**Why this matters**

Whilst homelessness is dangerous for everyone, women's homelessness is compounded by two key factors: near universal experiences of violence and abuse, and inequitable policies and data systems that fail to capture women's experiences, leading to a lack of adequate services.

**Where the National Plan must go further**

While the National Plan acknowledges some barriers faced by women, it does not set out a clear or strategic response. In particular:

**Definition of rough sleeping:** We are delighted to see the Government's commitment to ending traditional 'verification' based only on bedded down contacts and the inclusion of some gender-informed changes to the Rough Sleeping Risk Assessment tool. However, the definition of rough sleeping itself has not been reconfigured to include a gendered

understanding of the problem. In 2025, 65% of women reported sleeping rough in ways that fall outside of the current definition. Without government-led, gender-informed guidance, outreach services and current data collection methods will continue to miss women.

**The need to address the full spectrum of VAWG:** We are pleased to see the intersection of homelessness and domestic abuse referenced in the National Plan, and best practice responses such as Standing Together's 'Whole Housing' approach being championed. However, the Plan does not address the links between homelessness and wider forms of gender-based violence, which we know women who are homeless routinely experience. We would also like to discuss what could be done to respond to high-risk scenarios such as couples sleeping rough where abuse is present, an issue affecting almost 75% of couples sleeping rough in London, and a key driver of long-term rough sleeping.

**Under-use of evidence:** We are encouraged to see that the recent MHCLG rough sleeping questionnaire has done a deep dive into women's responses, and the Plan references this data. However, as with the previous questionnaire, responses from women were in the minority (151 out of 960 respondents), due to the fieldwork methods for data collection not being gender informed. Contrastingly, the Women's Rough Sleeping Census has gathered data directly from more than 3,000 women in almost 100 local authorities since 2022, and the 2024 Women's Census revealed ten times more women experiencing rough sleeping than official Government data. We would strongly encourage conversations about how to better utilise this data to inform homelessness policy, as recommended by the 2025 APPG for Ending Homelessness's Report.

## **What needs to happen next**

If ending homelessness means ending homelessness for everyone, it is critical that we actively address women's homelessness and its intersection with VAWG as an urgent issue in its own right. We therefore recommend that the Government:

- 1. Amend the 2010 Government definition of rough sleeping** in line with the findings and recommendations of the Women's Rough Sleeping Census, to reflect women's experiences (and also to be inclusive of the many other people who rough sleep less visibly.) We would also encourage undertaking Equalities Impact Assessments on all existing and new data collection methods (including the Ending Rough Sleeping Data Framework and the Rough Sleeping Risk Assessment Tool) to ensure they are inclusive of women's experiences and can gather data in line with a broader, gender-informed definition and understanding of rough sleeping.
- 2. Fund and resource the Women's Rough Sleeping Census nationally** and issue guidance to local authorities on how to adopt the Census, enabling them to gather accurate, inclusive data, and use national Census data to inform policy and funding decisions. The National Plan references the Women's Rough Sleeping Census as a means to improve data collection and encourages all councils to undertake it, yet it sets out no commitments to supporting this to happen. The census remains a voluntary data collection exercise, led by the third sector, with no capacity to expand nationally.

**3. Expand priority need** to explicitly include survivors of rape, sexual assault and sexual exploitation, through legislative amendments. Homelessness prevention guidance and legislation must also be amended to address the full intersection of VAWG, immigration status, and homelessness, which puts migrant survivors and survivors with No Recourse to Public Funds at extremely high risk.

**4. Ensure that all forthcoming toolkits, including but not limited to the prevention toolkit, the outreach toolkit, the complex needs toolkit and the temporary accommodation toolkit, are gender informed,** clearly and practically addressing women's experiences of rough sleeping, homelessness, gender-based violence and multiple disadvantage. The toolkits should also include clear guidelines and responsibilities on how Local Authorities should address and remove the structural and intersecting barriers to housing and support faced by global majority women, migrant women including women with No Recourse to Public Funds, LGBTQI+ women, women with disabilities and older and younger women. We hold significant expertise in these areas and would welcome the opportunity to collaborate with MHCLG colleagues on the development of the resources.

Women make up half of the population in this country, and experience homelessness, violence and abuse, economic disadvantage and multiple disadvantage disproportionately to men; yet remain overlooked in policy and data.

We would welcome a meeting with you to discuss how the National Plan can be implemented in a way that is equitable, effective and inclusive of women's experiences. We stand ready to work with you to make this change.

Yours sincerely,

**The National Women's Homelessness Coalition**, a group of homelessness and Violence Against Women and Girls (VAWG) organisations and women with lived experience of homelessness who are united in driving positive change for women in England who are experiencing homelessness, violence and abuse, and other multiple and intersecting forms of disadvantage.

Basis Yorkshire

Crisis

Groundswell

Homeless Link

IDAS

Solace Women's Aid

Single Homeless Project

Under One Sky

Women's Homelessness Alliance (WHA): Crisis, Shelter, Oasis Community Housing, Tyne Housing, Northumbria University, Action Foundation, Changing Lives, Places for People, Represent Women, Wearside Women in Need, Citizen's Advice Newcastle, North East Combined Authority, Emmaus North East, Newcastle Council

**The National Domestic Abuse and Housing Policy and Practice Group**, a collective including representation from across the housing, homelessness, VAWG, domestic abuse and LGBTQI+ sectors, working together to influence policy and ensure that women, children and all survivors can access secure housing and appropriate, good quality services when experiencing domestic abuse and/or VAWG.

Agenda

Agenda Alliance

Angelou Partnership

BSWAID

Changing Lives

Chartered Institute of Housing (CIH)

Commonweal Housing

Crisis

The Drive project

Employers Initiative on Domestic Abuse (EIDA)

End Furniture Poverty

Galop

Glass Door Homelessness Charity

Generation Rent

Gentoo

Hestia

Homefinder

Homeless Link

IMKAAN

Latin American Women's Aid

MOPAC

National Housing Federation (NHF)

Pathway

Peabody

Resolve ASB

Respect

Safelives

Shelter

Single Homeless Project (SHP)

Spring Housing (Thea Raisbeck)

Standing Together Against Domestic Abuse including Domestic Abuse Housing Alliance

St Mungo's

Stonewall Housing

Surviving Economic Abuse (SEA)

Solace Women's Aid