

# Domestic Abuse Policy

Last reviewed: February/2025

## **IMPORTANT**

**For Customers reading this Policy**

**If you are at immediate risk of serious harm, you should do one or all the following, as appropriate:**

- 1) call the police on 999**
- 2) present at the local authority if you cannot reasonably and safely remain/return home**
- 3) contact local Domestic Abuse Services**

## Document Control Sheet

<b>Status (Draft or Final &amp; Version)</b>	<b>V. 1.0</b>
<b>Document reference</b>	<b>Domestic Abuse Policy</b>
<b>Reason for review</b>	<b>New Policy</b>
<b>Approved by (Board/EB/Committee)</b>	<b>Board</b>
<b>Approved Date</b>	<b>05/06/2025</b>
<b>Effective from (Date)</b>	<b>01/04/2025</b>
<b>Effective to (Date)</b>	<b>01/04/2027</b>
<b>Policy owner</b>	<b>Customer &amp; Neighbourhood Director</b>
<b>Policy author</b>	<b>Head of Tenancy Sustainment</b>
<b>Review schedule (1, 2 or 3 years)</b>	<b>2 years</b>
<b>Date last reviewed</b>	<b>March 2025</b>
<b>Date of next review</b>	<b>March 2027</b>

## Version Control

<b>Date</b>	<b>Reviewed by (name and title)</b>	<b>New version number</b>	<b>Summary of changes</b>
Feb/2025	Jon Cox (Head of Tenancy Sustainment)	V. 1.0	New Policy replacing both former organisation's previous Domestic Abuse Policies

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## **1. Scope**

This policy applies to all customers, regardless of tenure type, who live in properties owned or managed by Sovereign Network Group (SNG).<sup>1</sup>

For employees who have been affected by domestic abuse issues, there is a separate Domestic Abuse Employee Support Policy.

## **2. Purpose and objectives**

When domestic abuse does occur, we will take a collaborative, victim/survivor-centred approach to supporting those who are affected and/or impacted.

Domestic abuse is a crime under the Domestic Abuse Act 2021, and also a breach of tenancy or lease.

Our policy explains what domestic abuse is, how we recognise it, what approach we'll take and how we'll respond to victim/survivor, children, young people and reported abusers.

We will work with appropriate local authority departments to support them in fulfilling their statutory duties and commissioning services for victims/survivors of domestic abuse and their children within safe accommodation.

## **3. Policy statement**

Many of our customers and their families may experience domestic abuse at some point in their lifetime. We want to do all we can to support our customers to address their issues in partnership with other agencies.

We'll always take time to understand the effect the abuse is having, making sure that our response is victim/survivor centred. We'll be helpful, sensitive and supportive – providing timely and accessible advice to reduce the risks they face.

## **4. Definitions**

Definitions mentioned in this Policy are explained in the table below. This is not an exhaustive list. For further examples of abusive behaviour, please see section 1 of the [Domestic Abuse Act 2021](#).

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<sup>1</sup> We will aim to provide all customers with appropriate advice, support and signposting. However, for leasehold and shared ownership properties there may be differences when considering alternative accommodation or adaptations to the customer's home (e.g. target hardening works).

Term	Definition
Domestic abuse	Domestic abuse is a crime under the Domestic Abuse Act 2021. It is any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between people aged 16 years or over, who are or have been personally connected to each other such as married, in a civil partnership, in an intimate relationship or family members. This applies regardless of gender or sexuality.
Controlling behaviour	Controlling behaviour is a range of acts to obtain power over another person through fear and intimidation, which make a person subordinate and/or dependent. This involves isolating the victim/survivor from sources of support, exploiting their resources and capacities for personal gain, depriving them of independence, resistance and escape and regulating their everyday behaviour.
Coercive behaviour	Coercive control is a type of domestic abuse where a perpetrator uses humiliation, intimidation and manipulation to frighten and control the victim/survivor.
Economic/Financial abuse	Economic abuse is any behaviour that has a substantial adverse effect on another person's ability to acquire, use or maintain money or other property, or obtain goods or services.
Psychological Abuse	Involves the regular and deliberate use of a range of words and non-physical actions used with the purpose to manipulate, hurt, weaken or frighten a person mentally and emotionally; and/or distort, confuse or influence a person's thoughts and actions within their everyday lives, changing their sense of self and harming their wellbeing.
Physical abuse	Is deliberately hurting or injuring someone. This could include hitting, smacking, pushing, shaking, spitting, pinching, scalding, misusing medication, inappropriate restraint, inappropriate physical punishments, or other ways of causing physical harm.
Sexual abuse	Is any behaviour thought to be of a sexual nature which is unwanted and takes place without consent. Sexual abuse can be physical, psychological, verbal or online. Any behaviour of a sexual nature that causes you distress is considered sexual violence or abuse. It involves all unwanted physical contact of a sexual nature and ranges from pinching, embracing, groping and kissing, to rape and serious sexual assault which involves penetration without consent.
Honour-based abuse	Honour-based abuse is a crime or incident committed to protect or defend the 'honour' of a family or community. If your family or community think you've shamed or embarrassed them by behaving in a certain way, they may punish you for breaking their 'honour' code.
Modern day slavery	Modern slavery covers a set of specific legal concepts including forced labour, debt bondage, forced marriage, slavery and

Term	Definition
	slavery-like practices, and human trafficking. Essentially, it refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, and/or abuse of power.
Personally connected	People who are 'personally connected' are: intimate partners, ex-partners, family members or individuals who share parental responsibility for a child. There is no requirement for the victim and perpetrator to live in the same household.
MARAC	Multi Agency Risk Assessment Conference It is a meeting attended by agencies to discuss cases of domestic violence that professionals consider to be 'high risk'. The purpose of the MARAC is so that all the agencies involved in helping victims can agree how best to offer protection and reduce risk.
DASH	Domestic Abuse Stalking & Harassment Risk Assessment (DASH) is part of the Multi Agency Risk Assessment Co-ordinator (MARAC) referral. DASH is a risk assessment form to establish the level of risk.
DAHA	The Domestic Abuse Housing Alliance's (DAHA) mission is to improve the housing sector's response to domestic abuse through the introduction and adoption of an established set of standards and an accreditation process.

The Domestic Abuse Act 2021 recognises children as victims of Domestic abuse in their own right if they witness or experience domestic abuse in the home. Where children are experiencing or witnessing domestic abuse this must be reported to Children Services.

## 5. Policy

### 5.1 Our approach to domestic abuse

Domestic abuse is a breach of tenancy, and where appropriate we'll take action against those responsible.

We recognise it can be challenging for victims/survivors to disclose information regarding domestic abuse. Therefore, we make it easy to report any incident to us, including through our website, customer portal, email, social media, contact centre, third party, in person.

A report of domestic abuse may not come from the survivor or victim and may not be labelled as domestic abuse by the person making the disclosure. We will ensure that we train our staff to be able to recognise a report of domestic abuse, even when it is not given that label by the person making the disclosure.

When we become aware of domestic abuse situations, we'll always:

- encourage the reporting of the incident to the police where safe to do so
- train our people to spot signs of domestic abuse, to provide guidance and support to victims/survivors
- treat all reports as a priority and respond within one working day
- provide accurate, helpful and supportive advice
- be understanding, empathetic, supportive and sensitive
- think about the impact on them and their family – especially children
- consider any disabilities or cultural issues, including intersectional needs (Intersectionality explains how different aspects of a person's identity—like race, gender, sexuality, or disability—overlap and interact to shape their experiences, especially regarding discrimination or inequality.)
- treat reports confidentially (but if we are concerned, they or anyone else is at risk of serious harm we'll report the concern to the police or safeguarding team)
- work with local authorities, police and other agencies such as specialist support services to make sure our customers are safe
- respect the wishes of the victim/survivor, unless this puts them or anyone else at serious risk of harm
- where appropriate to do so, take action against the reported abuser, if they are our customer, to make sure they are accountable for what they have done.

## **5.2 Responding to reports of domestic abuse**

We'll make sure we offer help without making matters worse for the victim/survivor or their family.

When speaking to the victim/survivor, we will:

- be non-judgemental, listen sympathetically and accept their account of the situation
- complete a risk assessment and agree an action plan, being clear about what we can and can't do as their landlord
- protect their identity and location, supporting them to improve the security of their home, such as changing locks or fitting alarms
- signpost and liaise with support services to manage the risks, including safeguarding referrals for adults and/or children
- offer advice on how they might resolve the issue. This may include the right to take their own civil action against the reported abuser
- agree with customer safe communication methods.

Although we don't provide services from our offices, in the case of domestic abuse we will make an exception and we may offer our meeting rooms to create a safe environment where victim/survivors can talk. Where our offices are not accessible to customers, we will try to work with our local partners to provide a more convenient safe space to meet them.

Where the police advise a victim is at high risk, we may work with local authorities to explore alternative accommodation options. In cases of domestic abuse, where appropriate we will consider allowing moves to other SNG accommodation even where there are arrears. (i.e. outside of our arrangements for internal transfers)

### **5.3 Responding to reported abusers**

Domestic Abuse is a criminal act and also a breach of tenancy or lease conditions and we will:

- support the police and local authority in prosecuting reported abusers by providing evidence where we have permission from the victim/survivor
- where appropriate, consider taking enforcement action to remove them from our homes
- where there is a joint tenancy, and a victim/survivor is unable to return to their home due to risk of harm, encourage them to seek legal advice
- where appropriate, recharge the reported abuser for any damage they've caused to the home
- where appropriate, refer the reported abuser to intervention programmes or other support where available.

We may also support reported abusers into other accommodation where available and appropriate – to reduce the risk to victims/survivors.

For more information, please refer to our Perpetrator Guidance.

#### **5.3.1. Continuous improvement to better support customers**

We will work to innovate, develop and improve the service we provide. This will be informed by our data, customer feedback, staff feedback, Housing Ombudsman recommendations and feedback and emerging sector best practice (including feedback from DAHA).

### **5.4 Partnership working**

Domestic abuse cannot be dealt with by any one organisation or agency working in isolation. We work alongside other partner agencies, including attendance at multi-agency meetings like MARAC to find solutions together and ensure victim/survivor safety.

We have also developed formal information sharing protocols and partnership agreements to allow us to respond quickly to domestic abuse.

We may make a referral to Social Services or the Police, this can include a safeguarding referral without the permission of the victim where the situation and the Data Protection Act 2018 justifies it.

### **5.5 DAHA (Domestic Abuse Housing Alliance) values and principles**

Their mission is to enhance the UK housing sector's status within the coordinated community response [CCR] to domestic abuse by transforming how they respond to domestic abuse so that victims/survivors have a home of their choice, where they are safe and live fear free.

We foster the following values and principles in the way we work and seek that those we work with align with the same values and principles.

Values:

- Integrity
- Collaboration
- Empathy
- Empowerment
- Respect
- Accountability

Principles:

- Non-judgment and belief
- Being person centred
- Amplifying victim/survivor voice
- Victim/survivor safety
- Working towards a coordinated community response [CCR]

### **5.6 Data protection and information sharing**

Where appropriate, SNG will share information with relevant partners—such as regulatory bodies, law enforcement agencies, or trusted third-party service providers—to effectively carry out its functions and duties. We will work within the provisions of the Data Protection Act and, where applicable, the UK General Data Protection Regulation (GDPR), which establish clear guidelines for the sharing of information and the protection of confidentiality and privacy.

SNG is committed to ensuring that personal data is treated fairly, lawfully, and appropriately, with the rights of individuals being upheld at all times. However, if an individual's safety is at risk, we are required to report our concerns to the responsible authorities and share the necessary information to protect that individual.

When we store or share information, we will consider the JAPAN test:

Justified	Is what we're doing justifiable in the circumstances i.e. can we justify the need to collect/store/share/destroy the personal information we are handling?
Authorised	Are we authorised to do this? Or is someone else designated as responsible for managing the recording or disclosure of this personal information?
Proportional	Is what we are doing proportional to the purpose? Could we achieve it by recording or sharing less or no personal information?
Auditable	Have we recorded what we've shared, with whom and why, so there is evidence of our actions?
Necessary	Is what we are doing necessary or can the end result be achieved in some other way without this disclosure?

## 6. Compliance

In order to recognise and effectively respond to cases of domestic abuse, all staff are expected to complete annual safeguarding and domestic abuse e-learning. Further training will be arranged dependent on roles.

Domestic abuse cases will be logged, managed and reported through our housing (case management) system and will be kept in line with GDPR and data protection policies and data retention schedules.

Responsible managers will regularly monitor each case of domestic abuse against our performance targets, provide appropriate advice and support to the responsible officer dealing with a case, ensure that they receive appropriate training; and ensure that all cases are appropriately recorded.

We will work with appropriate local authority departments to support them in fulfilling their strategic duties and commissioning services for victims/survivors of domestic abuse and their children within safe accommodation.

We comply with DAHA's principles and values by embedding a person-centred and victim/survivor-led approach within our housing services. We ensure that victims/survivors have access to safe, secure, and appropriate housing, free from fear, by working within a coordinated community response framework. Through collaboration, empathy, and accountability, we provide trained staff, clear policies, and effective safeguarding measures to support those affected by domestic abuse.

## 7. Sustainability

- At Sovereign Network Group, we recognise the critical importance of sustainability in our operations and services. We are committed to embracing sustainable practices that contribute to environmental protection, social equity, and economic viability.
- Examples of sustainability specific to this policy may include community engagement, customer empowerment and risk mitigation. By integrating these practices into our operations, we aim to create lasting value for our business, our customers, and the broader community, aligning with our long-term commitment to sustainable development.

## 8. Responsibilities

Role	Responsibility
Head of Tenancy Sustainment	<ul style="list-style-type: none"><li>- Strategic Lead for Domestic Abuse</li><li>- Design and Review of Policy and Procedure</li><li>- Service development</li><li>- Training requirements</li></ul>
DA Operational Group	<ul style="list-style-type: none"><li>- To be a sounding board on key strategic decisions around Domestic Abuse incidents</li><li>- To raise solution focussed ideas/concerns about our current approach or tools</li><li>- To support continuous improvement based on experience and internal/imported best practice</li><li>- To be an ambassador for the work of the group and the conduit for conversations with the wider business about Domestic Abuse</li></ul>
Regional Directors and Heads of Service	<ul style="list-style-type: none"><li>- Communication, implementation and operational compliance of this policy.</li></ul>
Responsible Managers	<ul style="list-style-type: none"><li>- Monitor and review all cases and ensure appropriate actions are taken prior to case closure</li></ul>
Responsible Officers	<ul style="list-style-type: none"><li>- Completing referrals, investigating and monitoring cases, reviewing actions and reporting critical incidents or immediate concerns to the Line Manager.</li></ul>

## 9. Equality, diversity and inclusion

- Sovereign Network Group is committed to the fair, respectful and equal treatment of its customers, employees and applicants.

- We will apply this policy consistently, fairly and will not discriminate against anyone based on the protected characteristics; age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation, determined in the Equality Act 2010.
- We'll make sure our services and workplaces are as inclusive and accessible as possible and take seriously any concerns that we've not acted in a fair way, dealing with them as quickly as we can.
- We are committed to helping customers to access information about their homes and services in a way that suits individual needs. We will also consider any reasonable adjustment requests in line with our Vulnerability and Reasonable Adjustments Policy.

## **10. Related documents**

- Safeguarding Policy
- Child & Young People Safeguarding Policy
- Data Protection Policy
- Income Management Policy
- Transfer Policy
- Mutual exchange Policy
- Anti-Social Behaviour Policy
- Perpetrator Guidance
- Domestic Abuse Employee Support Policy
- Domestic Abuse Employee Disclosure procedure
- Eviction Process
- Vulnerability and Reasonable Adjustments Policy
- Equality Diversity and Inclusion Policy and Strategy

## **11. Legislation and regulation**

- SNG is committed to ensuring compliance with all applicable legislation. To achieve this, we will take reasonable measures, including regularly reviewing our policies and procedures and updating them as necessary to reflect any changes in the legal landscape.
- The legislation listed in this policy is not intended to cover all legislation applicable to this policy. To comply with clause 1.1 of the Regulator of Social Housing's Governance and

Financial Viability Standard, which requires adherence to all relevant law, SNG will take reasonable measures to ensure compliance with all applicable legislation by reviewing policies and procedures and amending them as appropriate. Any queries relating to the applicable legislation should be directed to the policy owner.

- Housing Act 1996
- Children's Act 2004
- Protection from Harassment Act 1997
  - Domestic Abuse Act 2021
  - Data Protection Act 2018
  - Equality Act 2010
  - The Antisocial Behaviour Crime and Policing Act 2014
  - Care Act 2014

## **12. Review**

This document will be reviewed every 2 years, or sooner if significant changes occur in the relevant legal or operational landscape.