

Dover District Council

Domestic Abuse

(Housing Policy)



September 2024

Contents

1. Introduction	3
2. Definitions	3
3. Legal duties	3
4. Policy purpose and scope	4
5. Policy aims	5
6. Policy principles	6
7. Definition of domestic abuse	6
Impact of domestic abuse	7
8. Policy statements	7
Roles and responsibilities	7
How we will recognise and respond to cases of domestic abuse	8
Domestic abuse cases involving children under the age of 18	10
Record keeping	10
Support for victims / survivors	11
Perpetrators	12
Staff training and support	13
Multi-agency approach – Coordinated Community Response (CCR)	14
Awareness and communication of this Policy	14
Victim / survivor feedback	15
Guidance for non-Council staff	15
9. Implementation, monitoring and review	15
10. Complaints	15
11. Equality, diversity, and inclusion	16
12. Data protection and confidentiality	16
13. Version control	18

1. Introduction

- 1.1 Domestic abuse does not discriminate, it can have a prolonged impact to the health and wellbeing of residents. Dover District Council's ("the Council") Housing Services has an important role in recognising domestic abuse and supporting victims / survivors to access appropriate advice and access to safe accommodation away from the perpetrator.
- 1.2 The safety of our residents and communities is important to us. We believe that all forms of domestic abuse are unacceptable, and this Policy sets out not only our responsibilities under legislation in the context of housing, but also what actions we will take to support domestic abuse victims / survivors (including children) in partnership with other agencies.

2. Definitions

- 2.1 For the purposes of this policy:
 - 'We', 'ours' and 'us' refers to Dover District Council.
 - 'Staff' refers to members of staff who provide housing related services for us, including housing management, housing options, strategic housing, and property services.
 - 'Contractors' refers to third party organisations who provide housing-related services on our behalf.
 - 'Resident' refers to council tenants (general needs and temporary accommodation), prospective tenants and homeless applicants including their children.
 - 'Victim / survivor' refers to an individual or individuals who are victims or survivors of domestic abuse.
 - 'Perpetrator' refers to an individual or individuals who commit abusive behaviour towards another person or persons that constitutes as domestic abuse.
 - 'Tier 1 authority' refers to Kent County Council.
 - 'Tier 2 authority' refers to Dover District Council.
 - 'Safe accommodation' (or 'relevant accommodation') refers to part 4 of the Domestic Abuse Act 2021.
 - 'Suitable accommodation' refers to part 7 of the Housing Act 1996.
 - The 'Policy' refers to this Domestic Abuse Policy

3. Legal duties

- 3.1 The Domestic Abuse Act 2021 introduced:
 - A revised definition of domestic abuse which recognises children as victims; this is anyone under 18 years old who sees, hears, or experiences the effects of domestic abuse and is related to the victim or perpetrator.
 - A legal duty on Tier 1 authorities for assessing the need for accommodation-based support for victims of domestic abuse in their area and are required to effectively commission services based on a local strategy informed by a robust needs assessment, and report back annually to government. KCC must meet the support needs of all victims residing in 'relevant accommodation' including those who originally present from outside of the locality. Kent County Council's Domestic Abuse Strategy can be found [here](#).

- 'Relevant accommodation' (referred to in this policy as 'Safe accommodation') is defined by the Domestic Abuse Support (Relevant Accommodation and Housing Benefit and Universal Credit Sanctuary Schemes) (Amendment) Regulations 2021 and can be found [here](#).
 - A legal duty on Tier 2 authorities to work with Tier 1 authorities, so far as is reasonably practicable, to support victims / survivors of domestic abuse.
 - Victims / survivors made homeless because of domestic abuse will be in priority need for housing if they are eligible for assistance.
 - Requires local authorities to grant new secure tenancies to social tenants leaving existing secure tenancies for reasons connected with domestic abuse.
- 3.2 The Children Act 1989 states that the child's welfare is paramount and that every child has a right to protection from significant harm.
- 3.3 The Crime and Disorder Act 1998 Section 17 places a duty on the Council to consider the impacts of its functions and decisions in crime and disorder within their local area; and to fully cooperate within the local Community Safety Partnership (CSP).
- 3.4 The Care Act 2014 stipulates how local authorities (in this case Kent County Council) and other parts of the system such as relevant partners (which includes the Council) protects adults at risk of abuse or neglect. This includes those who are currently experiencing and those who have experienced domestic abuse.
- 3.5 The Social Housing (Regulation) Act 2023 introduced new rules that social housing landlords must comply with regarding the safety of homes. The revised Consumer Standards set a requirement for social housing landlords to work co-operatively with other agencies tackling domestic abuse and have a policy for how they recognise and respond to domestic abuse. This is elaborated upon in the Code of Practice ('the Code') to help tenants and landlords understand expectations, see page 14 of the Code for domestic abuse.
- 3.6 The Allocation of Housing (Qualification Criteria for Victims of Domestic Abuse and Care Leavers) (England) Regulations 2025 amends rules governing local connection requirements under the Housing Act 1996, specifically in relation to Part VI, which deals with the allocation of social housing. The Regulations provide that a local housing authority may not apply a local connection test to domestic abuse victims who are moving for reasons connected to that abuse, including from accommodation initially occupied as a result of that abuse on a temporary basis.

4. Policy purpose and scope

- 4.1 The purpose of this Policy and its associated procedures sets out to residents (as defined by this Policy in section 2) how the Council's Housing Service will recognise and respond to incidents of domestic abuse, and work with other agencies to facilitate support for victims / survivors of domestic abuse and their children.
- 4.2 For Council staff who may be experiencing domestic abuse, please refer to the Council's Domestic Abuse Policy.
- 4.3 This Policy demonstrates how the Council will meet its legal obligations and inform victims / survivors of what they can expect from us regarding their safety, including how we will work in collaboration with external agencies to alleviate and prevent domestic abuse.

- 4.4 We recognise that while domestic abuse is not restricted to a specific gender, domestic abuse is a gendered crime. Women experience higher rates of repeated victimisation and are much more likely to be seriously hurt or killed than male victims of domestic abuse.
- 4.5 It is important that appropriate service responses are in place to support victims / survivors of domestic abuse in the context of protected characteristics. We will endeavour to meet individual needs with a consistent and competent approach in line with good practice.
- 4.6 This policy will use the terminology used in the Domestic Abuse Act 2021 and by the Domestic Abuse Housing Alliance (DAHA).
- 4.7 The Policy should be read alongside the following policies:
- Tenancy Strategy 2021-2026
 - Tenancy Management Policy
 - Housing Allocations Policy
 - Hard to Let Properties Protocol
 - Anti-Social Behaviour and Hate Crime Policy
 - Housing Enforcement Policy
 - Vulnerable Tenant Policy
 - Safeguarding Policy
 - Equality Policy
 - [Domestic Abuse Statutory Guidance \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/781212/Domestic_Abuse_Statutory_Guidance_Easy_Read_V13_26-10-22_.pdf)
 - [Domestic Abuse Statutory Guidance Easy Read V13 26-10-22_.pdf \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/781212/Domestic_Abuse_Statutory_Guidance_Easy_Read_V13_26-10-22_.pdf)
 - [Delivery of support to victims of domestic abuse in domestic abuse safe accommodation services - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/delivery-of-support-to-victims-of-domestic-abuse-in-domestic-abuse-safe-accommodation-services)
 - [Tackling Domestic Abuse Plan - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/tackling-domestic-abuse-plan)

5. Policy aims

5.1 The aim of this Policy is to support and safeguard victims / survivors of domestic abuse, including their children, wherever possible. The specific aims of the policy are:

- 1) Residents experiencing domestic abuse are aware of the support which the Council's housing service can provide them and that this service is accessible, supportive, effective, and victim / survivor focused.
- 2) We as a council work collaboratively with knowledgeable and specialist partner agencies towards the prevention of domestic abuse within our housing stock and those who are made homeless as a result of domestic abuse.
- 3) Staff are clear and confident about the Council's approach to domestic abuse and receive the necessary training and support to deliver a consistent, sensitive and confidential service. This will involve raising awareness of domestic abuse and its indicators amongst relevant staff.

- 4) We provide housing support and solutions that are appropriate to the needs of the victim(s) / survivor(s) and hold perpetrators to account for their actions, whilst maintaining the primary focus upon the safety of the victim(s) / survivor(s), including their children.
- 5) The Council's service for those victims / survivors of domestic abuse, including their children, is robustly monitored to identify and explore opportunities for improvement.

6. Policy principles

- 6.1 We are committed to the following principles when recognising and responding to domestic abuse:
 - 1) Our practice is underpinned by safety-led case management.
 - 2) A survivor-led approach is taken when responding to incidents of domestic abuse.
 - 3) Sensitivity and empathy to the diverse needs of victims / survivors of domestic abuse.
 - 4) Staff have the correct skills, tools, and knowledge to effectively respond to incidents of domestic abuse.
 - 5) Working in partnership with external agencies to provide the most appropriate response to support victims / survivors of domestic abuse, working towards a Coordinated Community Response, see 8.54 - 8.58..

7. Definition of domestic abuse

- 7.1 The Council uses the definition used in the Domestic Abuse Act 2021 which defines domestic abuse as the behaviour of one person towards another who are each aged 16 or over and are personally connected to each other, and the behaviour is abusive.
- 7.2 Personally connected refers to those who 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.
- 7.3 The 2021 Act defines behaviour as “abusive” if it consists of any of the following—
 - a) physical or sexual abuse;
 - b) violent or threatening behaviour;
 - c) controlling or coercive behaviour;
 - d) economic abuse;
 - e) psychological, emotional or other abuse.

It does not matter whether the behaviour consists of a single incident or a course of conduct. Stalking, female genital mutilation (FGM) and forced marriage are all offences in their own right but may be demonstrative of domestic abuse.

- 7.4 Under the 2021 Act, children under the age of 18 are also recognised as victims / survivors in their own right if they see, hear or experience the effects of the abuse and are related to the victim / survivor or the perpetrator.

- 7.5 The Act recognises that domestic abuse can be more prevalent within certain groups and that any response must consider those with protected characteristics and acknowledges that they may experience more barriers in accessing support.
- 7.6 We have chosen to use the term 'domestic abuse' in this Policy to cover all the different types of abuse (see 7.3) and given the definition above (see 7.1 and 7.2).

Impact of domestic abuse

- 7.7 Domestic abuse can have devastating impacts on victims / survivors and communities. These impacts include mental, emotional, physical, social, and financial harm to the victim / survivor. The impact can also lead to substance misuse, self-neglect, self-harm, suicide, and homelessness. The risk of further abuse whilst rough sleeping or hidden homeless is significant, this is reduced by victims / survivors of domestic abuse having priority need for housing.
- 7.8 Children are not a homogenous group, and there is a range of factors that may determine the nature of children's experiences as victims / survivors of domestic abuse - including age, sex, disability, race and socio-economic context. Professionals should develop an individual response for every child and young person affected, including for siblings. They may feel confused and unsure how they feel towards the abuser and victim / survivor of domestic abuse. The longer children live with domestic abuse, the more severe the effects can be. Children who experience domestic abuse may:
- Feel frightened
 - Become aggressive
 - Display anti-social behaviour
 - Suffer from depression or anxiety
 - Underperform at school due to difficulties at home or disruption of moving accommodation
 - A full list of the impacts to children can be found via government guidance: [Domestic Abuse Statutory Guidance \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)
- 7.9 Domestic abuse has wider social impacts and costs, including the costs of police, health and other service responses. The victim / survivor may also have to take time off from employment or caring responsibilities. There are also additional barriers particular to social groups and individuals with protected characteristics that victims / survivors might face that prevents them from escaping domestic abuse or accessing support or justice.

8. Policy statements

Roles and responsibilities

- 8.1 All staff are responsible for complying with domestic abuse legislation, this Policy, the Council's Safeguarding Policy the Equality Policy and associated processes when identifying, recording, and providing support to victims / survivors. Staff are also responsible for attending training when required as appropriate for their role, and to have an awareness of safeguarding, report and refer any concerns to their line manager and a Designated Safeguarding Officer (DSO).

- 8.2 All line managers and supervisors are responsible for complying with domestic abuse legislation, this Policy, the Safeguarding Policy and the Equality Policy and associated processes. This means that any staff working within their service areas have read and understand this Policy and associated policies and procedures, can easily access them, comply with them, undertake and complete training when required, such as e-learning provided by the Council, or prescribed training provided externally.
- 8.3 DSOs are district leads on the respective children and adult Safeguarding Boards and give advice on requirements for vetting and training requirements and coordinate serious safeguarding cases and reviews.
- 8.4 The Tenancy Support Team (TST) will take on referrals of domestic abuse relating to our tenants. If Housing Officers are notified about a domestic abuse matter this will be referred to the TST who will follow internal procedures, make external referrals (for example, to MARAC) and signpost as appropriate. Housing Officers should still be aware of how to identify and appropriately raise cases of domestic abuse; **staff must contact the police as a first point of contact where there is a risk of immediate harm.**

How we will recognise and respond to cases of domestic abuse

- 8.5 The Council might be able to identify abuse at earlier stages than other organisations; it is important for staff to be alert to and understand the signs of domestic abuse through appropriate training. We will always act in accordance with statutory guidance when dealing with cases of domestic abuse.
- 8.6 Domestic abuse may come to the attention of staff through different ways. These include (but are not limited to):
- Through contact with our Allocations Team to identify anyone who has been a victim / survivor of domestic abuse prior to their tenancy with the Council.
 - Via a report of anti-social behaviour by someone, such as neighbours.
 - Via a concern raised by someone to the Housing Officer, such as neighbours.
 - From a routine visit by the Housing Officer or another Council Officer.
 - The victim / survivor may highlight themselves that they are / have suffered domestic abuse when their Housing Officer is visiting. This could be done directly via them confiding in their Housing Officer or the Housing Officer might deduce this from their actions / comments.
 - Via a referral from an external partner such as the police or a multiagency setting such as MARAC.
 - By contractors raising safeguarding or welfare concerns to us.
 - Through property repairs / damages which may indicate abuse.
 - Via a tenancy audit visit.
- 8.7 Sometimes, some signs of domestic abuse in the home can be mistaken for anti-social behaviour (ASB). When this happens, it can have a negative impact on the victim / survivor. In accordance with our Anti-Social Behaviour Policy, all reports of ASB investigated by Officers will be done so with a 'domestic abuse lens'. This is because signs of domestic abuse can be overlooked as ASB (i.e., arguments, shouting, damage to property etc) and early action can be taken to safeguard the victim(s) / survivor(s), including children.
- 8.8 Relevant staff will also be aware of tactics used by a perpetrator which have safety and financial implications for the survivor / victim, this may be a form of economic abuse.
- 8.9 When dealing with any case of domestic abuse or safeguarding concern, staff must speak with their line manager and a Designated Safeguarding Officer.

- 8.10 If a report of domestic abuse is received, the safety of the victim(s) / survivor(s) will be our main priority. Empathy will be at the forefront of every decision we make with the victim(s) / survivor(s); we will respond with belief, non-judgement and offer survivor-led support.
- 8.11 Officers must determine whether there is an immediate risk of harm to them, including children. Where this is the case, Officers must contact the police and might have to act without the victim's / survivor's consent.
- 8.12 If the report has come from a third party (such as a neighbour) then we will establish whether this has been reported to the police and if it has not been, we will make the police aware of this so they can investigate. Although we will not contact the victim / survivor directly, we must still record the information (see 8.24 - 8.28 for guidance on record keeping).
- 8.13 Victims / survivors are not obliged to speak to us about domestic abuse incidents, but we strongly advise them to speak to someone about this, whether it be a trusted relative or professional. If there is an immediate risk of harm, the first point of contact should always be the police to give the necessary response.
- 8.14 Where the victim / survivor has contacted us personally and there is no immediate risk of harm, we will contact them within 2 working days to offer a personal discussion within a reasonable time frame. Staff must complete a DASH (Domestic Abuse, Stalking and Honour Based Violence) Risk Assessment Checklist, which is recommended by the Kent & Medway Multi-Agency Risk Assessment Conference (MARAC). If it is not possible to speak to the victim / survivor within 2 working days due to our offices being closed or a bank holiday or for any other reasonable reason, we will:
- Contact the victim / survivor on the next available working day; and
 - Refer the victim / survivor to domestic abuse support services. Details will be available on our website.
- 8.15 High-risk domestic abuse cases will be shared and discussed at the Kent and Medway Multi-Agency Risk Assessment Conference (MARAC), where there are representatives of local police, probation, health, child protection, housing practitioners, Independent Domestic Violence Advisors (IDVAs) and other specialists from the statutory and voluntary sectors. The MARAC will provide guidance to our representatives on how best to proceed with the case.
- 8.16 Discussions with a victim / survivor will take place in a confidential setting with an appropriate member of staff. If requested by the resident, we can make reasonable adjustments to help victims / survivors feel safe and comfortable during the discussion. Some adjustments we can make include the following:
- Providing an option for a telephone discussion.
 - Providing an option to have the discussion in a space the victim / survivor feels comfortable or safe but allows for the conversation be both private and confidential.
 - Giving the option for the victim / survivor to have the meeting with a member of staff of the same sex.
 - Two officers will attend in person meetings with victims / survivors.
 - Where required, providing translations services to aid communication.
- 8.17 Any adjustments made will be conducted in accordance with our Vulnerable Tenant Policy, the Council's Safeguarding Policy, and the Equality Policy.

- 8.18 Discussions will be centred around the victim / survivor and their needs. During the discussion Officers will:
1. Listen attentively and objectively to the victim's / survivor's concerns and experiences.
 2. Understand how the victim / survivor wishes to proceed and inform them of how we can support them.
 3. Share information about specialist domestic abuse services and offer a referral, including to local support groups.
 4. Record all discussions and actions that have been agreed by both the Officer and the victim / survivor, and store these on their file.
- 8.19 If the victim / survivor appears to have additional needs associated with addiction or mental health problems, we will refer them to the relevant support services, as well as to domestic abuse services. Consideration will also be taken of a victim's / survivor's protected characteristics. All referrals to relevant external support services will be done so with the victim's / survivor's knowledge and consent.
- 8.20 We understand that victims / survivors may have additional barriers to seeking support and we will tailor our response to help remove those barriers. These barriers can extend beyond the 9 protected characteristics as individuals may experience other form of disadvantage, for example relating to their level of education or their immigration status. We will aim to make our support as accessible as possible, and we will aim to be anti-racist in our practice. We will tailor our support and adjustments to the needs of the individual on a case-by-case basis, examples of additional support will include the use of interpreting services.
- 8.21 Officers will work in the best interests of the victim(s) / survivor(s) and in cooperation with and under the guidance of specialist domestic abuse agencies to provide safe accommodation for people experiencing abuse.
- 8.22 The [Homelessness Code of Guidance](#) recommends that housing authorities implement reciprocal agreements with other housing authorities and providers to facilitate out of area moves for victims / survivors of domestic abuse. As of December 2023, the Council are a part of the [Kent Housing Reciprocal Agreement](#) which is a voluntary collaboration between registered housing providers in Kent and Medway. Through this agreement, we have committed to support and facilitate social tenants who are at risk of harm from domestic/ sexual violence and other Violence Against Women and Girls, to move to another housing provider in a safe area, whilst retaining their tenancy rights. This goes beyond our statutory obligation to remove the local connection test for victims of domestic abuse; this cross-district coordination offers a more structured route for survivors whilst ensuring security of tenure and reduces the burden on homelessness departments.

Domestic abuse cases involving children under the age of 18

- 8.23 Children living in households with domestic abuse will always require safeguarding and will be referred to Children's Services in all cases. Our approach to safeguarding aims to reduce the risk of harm to children who are experiencing or are at risk of abuse or neglect.

Record keeping

- 8.24 Whenever there is a disclosure or suspicion that domestic abuse is taking place in a household, Officers must record this clearly and confidentially on the residents file, ensuring that appropriate 'flagging' is applied. Records improve continuity of care; documenting evidence provides a comprehensive picture. Crucially, this often enables a more appropriate response or decision to be reached.

8.25 When recording information regarding domestic abuse, Officers must:

- Use straightforward and clear language and avoid using abbreviations.
- Be sure to differentiate between fact and opinion.
- Arrange the findings in chronological order.
- Record the outcome of any decisions that was made, including the rationale.
- Outline the action(s) taken (when, by whom and why).
- Use respectful language.

8.26 It is crucial that Officers record information in this way since:

- it may be called upon as evidence by the Police or other authorities during an investigation and / or prosecution of a domestic abuse case; and
- the information may be shared with other support services, and clear and concise notes will enable them to understand the case and better tailor their support.

8.27 The Council recognises that cases of domestic abuse are very sensitive and must be handled with care, in addition to adhering to data legislation (see 12), staff must understand that perpetrators may go to great lengths to obtain information on the survivor / victim. Perpetrators could potentially have links to employees and sharing information should be on a need-to-know basis.

8.28 Staff can report a safeguarding incident internally through accessing the safeguarding site on SharePoint, all cases or suspected cases of domestic abuse are a safeguarding concern and should be reported here after staff have had a discussion with their line manager. The Tenancy Support Team (TST) should be contacted separately to this, as safeguarding reports are received by Designated Safeguarding Officers (DSOs) who do not have responsibility of informing the TST.

Support for victims / survivors

8.29 We will provide tenants with a range of options to access clearly detailed advice and information about their rights.

8.30 While we are committed to supporting victims of domestic abuse, we acknowledge that we may not always be the correct service to speak to, and that victims / survivors may wish to speak to other services for advice and support. We will raise awareness of and signpost to the following services which offer a range of help and support:

- The Domestic Violence Helpline, run in partnership between Women's Aid and Refuge **(0808 2000 247)**.
- [Kent and Medway Victim Support](#) **(0808 168 9111)** provides a 24/7 helpline and a live chat.
- [Oasis](#) **(0800 917 9948)** help people in East Kent, Medway and North Kent find the strength and support to leave an abusive relationship.
- [Male Domestic Abuse Advocacy Service](#) - Look Ahead **(0333 010 4660)** offer domestic abuse support for men across Kent and Medway.
- The [Bright Sky App](#), a mobile app and website operated in conjunction with Hestia for anyone experiencing domestic abuse, or who is worried about someone else.
- The [ManKind Initiative Domestic Support Service](#) (MIDASS) **(01823 334244)**, which provides support to men experiencing domestic abuse.
- [Galop](#) **(0900 999 5428)**, which provides support to LGBT+ people who have experienced a hate crime, domestic abuse or sexual violence. Galop also provide a specific Men's Advice helpline run by Respect **(0808 801 0327)**.

- [Muslim Women's Network \(0800 999 5786\)](#), which provides a confidential listening service for Muslim girls or women.
- [Jewish Women's Aid \(0808 801 0500\)](#), which provides support to Jewish women and children affected by domestic and sexual violence.
- [Southall Black Sisters \(020 8571 9595\)](#) operates a specialist advice helpline for ethnic minority and migrant women with no recourse to public funds.
- [Domestic abuse | Hourglass \(0808 808 8141\)](#) the Hourglass helpline is dedicated to helping those effected by the abuse of older people.
- Our website also lists support agencies: [Domestic abuse \(dover.gov.uk\)](https://www.dover.gov.uk)

Existing tenants and transfers

- 8.31 We will provide housing options advice to victims / survivors regarding their tenancy. This may include:
- Accessing emergency temporary accommodation or a refuge in the interim where there is a risk to safety.
 - Remaining in their property but with additional security measures.
 - Speaking to specialist support and legal advice.
- 8.32 Victims / survivors who are joint tenants with a perpetrator of domestic abuse may be able to apply to court to transfer the tenancy into their sole name. Details of where victims / survivors can obtain legal aid and advice will be available on our website.
- 8.33 If you are joint tenant, one tenant can end the tenancy by giving us notice and the tenancy will end both joint tenants. We will provide housing options advice to victims / survivors.
- 8.34 Victims / survivors who wish to terminate their joint tenancy and move into the private sector accommodation will be supported to do so.
- 8.35 We may support housing victims in another locality through the Kent Housing Reciprocal Agreement, see 8.22.
- 8.36 Any repairs for damage to the property that may leave the victims / survivors at risk, such as an unsecured entry, will be categorised as an emergency repair and works will be carried out within 24 hours of the report.
- 8.37 Where required, we can provide improved security to a victim's / survivor's home such as changing the locks to doors and windows or support with accessing Sanctuary Access for Eligible Residents (SAFER), the SAFER scheme referral form can be found [here](#).

Homelessness applicants

- 8.38 As established in legal duties (see 3.1), applicants who are homeless because of domestic abuse will have a priority need for accommodation and a local housing authority may not apply a local connection test. Where an authority is satisfied that an applicant is eligible and homeless or threatened with homelessness, it must assess an applicant's needs and this is partially informed by the circumstances which led to an applicant's homelessness. Victims / survivors of domestic abuse are likely to have particular housing needs, as referenced throughout this Policy. Homelessness applications will be referred to Housing Options staff.

Perpetrators

- 8.39 We may take appropriate enforcement action against tenants responsible for acts considered to be domestic abuse. Perpetrating domestic abuse constitutes a breach of the tenancy agreement. We will consult with specialist agencies such as Respect and social services, before taking punitive action against the perpetrator to minimise any additional risk to the victim(s) and survivor(s), which includes children.
- 8.40 Our approach to dealing with perpetrators will be in accordance with DAHA's [Perpetrator Management Toolkit](#). The safety of victims / survivors will be central to our approach to holding the perpetrator to account.
- 8.41 Where a Notice to Quit or completed termination form has been issued by the victim / survivor or via a Court Order to end a joint tenancy, the perpetrator must vacate the property by the specified end date.
- 8.42 Staff should not contact perpetrators to discuss any abuse or reports made and recorded, nor should staff inform the perpetrator that they are being discussed at the MARAC or divulge details of that discussion.
- 8.43 All enforcement action taken will be conducted in accordance with the Housing Enforcement Policy.
- 8.44 We recognise that some perpetrators may be very reluctant to acknowledge their actions and / or ask for help to change their behaviour, but where it is possible to engage with them constructively, we will. Details about services and advice for perpetrators will be made available on our website, such as:
- [Respect \(0808 802 4040\)](#) is a charity which supports perpetrators to help them end their abusive behaviour.
 - [The Freedom Programme](#) is a domestic violence programme for men and women wishing to change their behaviour, they also have a helpline **(01942 262 270)**.
- 8.45 Our engagement with a perpetrator does not in any way excuse them of their abusive actions or behaviour, nor does it mean we will not pursue enforcement action against them, but it represents a constructive effort on our part to increase safety, prevent recurrence of abusive behaviour and potentially save lives.

Staff training and support

- 8.46 The success of this policy is reliant on staff having awareness, knowledge, skills, and confidence to understand the signs of and identify domestic abuse, set boundaries, and appropriately support victims / survivors.
- 8.47 Domestic Abuse training is embedded in the Housing Services induction programme and e-learning.
- 8.48 We recognise that domestic abuse can be a complex subject area and we will review opportunities for prescribed training provided externally on an ongoing basis. This is to help Officers understand the Council's legal and regulatory requirements and provide a survivor-led approach to safety-led case management.
- 8.49 We will review the quality and quantity of training provided to check that it provides value for money, and that staff knowledge, skills and confidence are maintained and / or improved.
- 8.50 The Council has Designated Safeguarding Officers (DSO) who have received specialist training on adult and child safeguarding, which includes incidents of domestic abuse. All staff are encouraged to speak to a DSO if they have any questions or concerns regarding the welfare of a resident.

- 8.51 Situations relating to domestic abuse has the potential to become tense and put staff at risk of verbal abuse, aggression or violence; a suitable and sufficient risk assessment must be undertaken to identify the control measures needed to remove or minimise potential risks to as low a level as reasonably practicable. These control measures include the provision of personal safety and conflict management training, lone working procedures, provision of lone working equipment, and safe method of contact.
- 8.52 We acknowledge that exposure to domestic abuse can have a negative impact to the wellbeing of staff.
- 8.53 In addressing the adverse effects of vicarious trauma, we value a culture that supports staff wellbeing – our management promotes trust, respect and support. Staff should feel able to say when they feel overwhelmed through regular contact with their line manager. There is also the Employee Assistance Programme which staff can access via SharePoint

Multi-agency approach – Coordinated Community Response (CCR)

- 8.54 Domestic abuse is a complex and multi-faceted issue. No single agency or support service, including the Council, can provide all the support and assistance to victims / survivors that they might require. This is why a coordinated community response utilising the skills and knowledge from specialists are needed.
- 8.55 As part of the Kent and Medway MARAC (Multi Agency Risk Assessment Conference), the Council works with multiple agencies, both statutory and voluntary, to address high-risk cases of domestic abuse, and through these meetings our staff and representatives can learn and share good practice methods. We will work with partner organisations:
1. to identify and support survivors / victims experiencing domestic abuse, and where necessary to provide improved security for their home.
 2. to provide co-ordinated services to prioritise the safety of the victim(s) / survivor(s), which includes children.
- 8.56 KCC commission domestic abuse services across Kent, known as the Kent Integrated Domestic Abuse Service (KIDAS). The KIDAS contract includes the core community contract which is delivered by three lead providers: [Oasis](#), Clarion and Lookahead. Oasis delivers services and subcontracts to a Delivery Network of providers in Dover and Thanet, who our Designated Safeguarding Officers have regular contact with.
- 8.57 We will consider what preventative action can be taken through our partnership working, with the aim of preventing domestic abuse from continuing by raising awareness and offering support, through working with specialist domestic abuse services and accommodation support. The Council will not directly deliver all preventative support; therefore, we will work closely with partners who can provide this support and endeavour that our staff have good local knowledge regarding the relevant support available.
- 8.58 Further information on the domestic abuse referral pathway for Kent and Medway can be found [here](#).

Awareness and communication of this Policy

- 8.59 We are committed to raising awareness of domestic abuse and ensuring that our residents and communities are clear on our position. This may include giving information via tenant newsletters, our free Keep Me Posted email bulletin services or through our website.
- 8.60 We will make information on accessing domestic abuse support available and accessible on our website, signposting to appropriate local support services.
- 8.61 All staff will be made aware of this Policy, its aims, objectives, and principles..

Victim / survivor feedback

- 8.62 Victims / survivors are in no way obliged to provide us with feedback, but it will help us to make positive changes to the way we work. We will use feedback to improve our internal processes and review support provided to victims / survivors of domestic abuse, whilst making sure that staff can make informed decisions. Feedback and views from residents will also be used during the formal reviews for this Policy, and any subsequent policies and procedures.

Guidance for non-Council staff

- 8.63 By 'non-Council staff' we refer to individuals who may not be directly employed by the Council, but who may be contracted to carry out works or services on our behalf.
- 8.64 Non-Council staff that recognise or notice signs of domestic abuse or have concerns about the welfare of an individual or a child, must report this to social services. If they witness any incidents of violence, this should be reported to the police.
- 8.65 Once this has been reported to social services or the police, non-Council staff should make the designated Housing Officer (if known), the Tenancy Support Team (TST), or a member of housing staff, aware of this. Non-Council staff may be asked to provide information or details in case reviews where they have reported concerns of domestic abuse.

9. Implementation, monitoring and review

- 9.1 Monitoring is necessary to ensure that the Council delivers the aims and objectives set out in this Policy. Senior Managers will be responsible for ensuring that staff are complying with this Policy and national guidance on overseeing domestic abuse cases.
- 9.2 Staff will be provided with domestic abuse procedures to follow to ensure that they comply with the Policy provisions and both legislation and regulation. The procedures will also ensure that staff are providing a consistent service and support to victims / survivors.
- 9.3 This Policy will be reviewed every three years, or in response to relevant changes in legislation, organisational structure, development of good practice, or to address operational issues.
- 9.4 Any minor amendments required will be made through delegated approval. Any amendments made because of changes to operational process or Government legislation will be made through the local decision-making process. Major changes will be consulted upon before a decision is taken to implement them

10. Complaints

10.1 The Council's definition of a complaint is:

"An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or a group of residents."

10.2 The Council takes complaints made about any service it provides, officers who work for the Council or contractors who provide our services, seriously. If a tenant or leaseholder wishes to make a complaint about the service they have received, a Council officer or contractor, they can be made:

- In writing (letter or email)
- Using our online complaint form
- Using the Council's Complaint Leaflets (these are available at the Council's office reception, or our residents can request them to be posted)
- Via telephone; or
- In person by an appointment

10.3 Reasonable adjustments will be made during the complaints process for vulnerable residents (please see our [Vulnerable Tenant Policy](#)).

10.4 All complaints received will be dealt with in accordance with the Council's Complaints Policy and Procedure. More information about how to make a complaint can be found on our website: If you are unhappy (dover.gov.uk).

11. Equality, diversity, and inclusion

11.1 The Council is committed to promoting equality of opportunity and to eliminating unlawful discrimination on the grounds of race, age, disability, gender, sexual orientation, religion, belief, financial status, and any other difference that can lead to discrimination or unfair treatment considering the principles of the Equality Act 2010. Please see our Equality Policy for more details.

11.2 A full Equality Impact Assessment (EIA) was conducted for this policy in accordance with our Public Sector Equality Duty (PSED) when carrying out our duties (s149 of Equality Act 2010). The EIA has identified no negative impacts as a result of the Policy's implementation, and therefore there is no requirement at this time for mitigative actions to be put in place.

12. Data protection and confidentiality

12.1 The Council is a Data Controller under the UK General Data Protection Regulation (GDPR). The Council processes and protects personal data in accordance with data protection legislation.

12.2 Important considerations we will make when processing and sharing is whether the information will:

- Likely support effective safeguarding and promote the welfare of children, young people and adults who are at risk of harm;
- Likely aid accurate risk assessments; and
- Likely inform decisions about suitable services that can be offered to reduce risk, promote the welfare and improve the lives for the whole family.

- 12.3 We will only share necessary, relevant, adequate, and accurate information that is proportionate to the case with partner agencies, and in compliance with the GDPR and the Data Protection Act 2018.
- 12.4 Under no circumstances will we share information about the victim(s) / survivor(s) with the perpetrator and / or their representatives since this may put the victim(s) / survivor(s), including their children, at risk. Staff will treat all domestic abuse cases as confidential and will reassure victims/survivors of this, they will also explain how their personal information will be processed including the collection, storage, sharing and retention of their data.
- 12.5 Every decision to share or not to share information is recorded. If our decision is to share the information, justification will be cited including what information has been shared and with whom, and in line with existing organisational procedures. Where we decide not to share information we will record the reasons for this decision. This is in line with current DAHA guidance. Data sharing will take place under the Kent & Medway Information Sharing Agreement when sharing with other signatories of this agreements.
- 12.6 Although in some cases consent may be obtained for personal data processing and data sharing, in many cases the Council will not require consent e.g., where there is a safeguarding concern, and someone is at risk. In these cases, we will rely on our public tasks and safeguarding obligations and may rely on vital interest grounds of the data subject as our lawful basis.
- 12.7 Full details of how we store and use personal information can be found on our website and in our corporate and housing privacy notices at www.dover.gov.uk/privacy. This will also contain contact information if you have any questions or require assistance from the data protection / information governance team.
- 12.8 For further information on our data protection compliance please view our Data Protection Policy on our [Data Protection \(dover.gov.uk\)](http://Data Protection (dover.gov.uk)) page.



13. Version control

Approval date	2 September 2024
Approved by	Cabinet
Policy owner	Housing Services
Scheduled review	September 2027

Policy controls sheet		
Date	Summary of change	Author and approver
October 2025	Policy updated to reflect changes suggested by Domestic Abuse Housing Alliance (DAHA) representatives and legislative changes.	Author: Housing Policy Officer Approver: Strategic Director (Housing, Assets & Finance) & Portfolio Holder for Housing, Education and Skills.

