

1. This policy sets out how we will help and support Guinness residents, or those living with them, if they are experiencing domestic abuse. It also sets out the action we will consider taking against perpetrators of domestic abuse. This policy applies to all our residents and those living with them. It also applies to everyone who receives a service from us.
2. This policy supports the delivery of our strategic objective to meet our legal and regulatory requirements, our commitments under the Domestic Abuse Housing Alliance (DAHA) accreditation, and the Chartered Institute of Housing (CIH) "Make a Stand" pledge. Further details are set out in Annex 1.

The Guinness Policy

3. Our policy is that we will:
 - Take appropriate action to reduce the risk of abuse where we think it might happen;
 - Aim to keep people experiencing abuse safe by working proactively with them to assess the risk of further abuse;
 - Provide people with options and empower them to make choices, so that they are able to identify the option that best meets their individual circumstances;
 - Liaise with the lead statutory agency and other relevant local bodies, including charities, to reduce the risk to the person experiencing abuse;
 - Support the lead statutory agency in taking action against perpetrators of abuse. This includes taking tenancy enforcement action against perpetrators where it is appropriate to do so; and
 - Continually improve our response to domestic abuse by learning from customer feedback and feedback from a range of other agencies.

Background

4. Domestic abuse is a criminal offence and is also a breach of our tenancy agreements. It impacts on the safety of individuals, their households and local communities. Domestic abuse often takes place in the home and so we have a role in identifying these issues, supporting the people affected and taking action against perpetrators.
5. DAHA was formed to promote best practice, raise awareness and improve staff skills in identifying and dealing with domestic abuse. The CIH also recognised this and formulated the "Make a Stand" pledge. This is a public commitment for registered providers to indicate their support for people experiencing domestic abuse. Guinness supports both of these initiatives.
6. Guinness uses the definition of domestic abuse set out in the Domestic Abuse Act 2021. This and other definitions are set out in Annex 2.

Further detail

Receiving reports or concerns of domestic abuse

7. Concerns about, or reports of, domestic abuse may be reported to any member of Guinness staff, or a Guinness contractor/agent. We will accept reports and disclosures of domestic abuse through any available communication channel. The Guinness representative receiving the report is responsible for ensuring the information is logged properly.
8. If the alleged abuse concerns a customer in regulated care services, our response will be limited to reporting the abuse to the police, local authority safeguarding team and the care regulator. Any alleged

abuse that concerns a person in our agency managed stock will be managed in accordance with the relevant management agreement.

9. If a member of Guinness staff suspects or witnesses domestic abuse taking place in our homes or neighbourhoods, they are required to refer it to our specialist team who will investigate further and act as set out in paragraphs 11 to 30 below.
10. We will always accept the person's account at face value. We will help people to tell us about the abuse quickly, safely and confidentially, so that telling us doesn't put them at further risk. We will agree with people how future contact can be made safely.

Assessing the risk

11. We will take into account all protected characteristics that are presented by the person and members of their household when assessing the risk and action we will take.
12. We take a risk-based approach to managing any ongoing threat of domestic abuse. This includes working with the person to consider the best options available to prevent further abuse from happening.
13. Effective prevention of further domestic abuse often requires successful multi-agency partnership working e.g. with the police or social services. Where this is the case, we will risk-assess the reported abuse and then work with specialist external agencies to find a solution for the person. This might include agreeing steps we will take to reduce the risk. If the risks are high, we will refer the concern to the local Multi-Agency Risk Assessment Conference (MARAC) (see "working in partnership" below).

Managing domestic abuse cases

14. We will liaise with the person to repeat the risk assessment and update the safety plan where a risk of further abuse is reported to us. This helps us to ensure that we continue to take appropriate action. Where we are working with external agencies, we will take account of their risk assessments. We will also record their safety plans and the outcome of any action they have taken.
15. If a violent domestic incident is reported to us and the Guinness resident wants to remain in their home, we will act to secure it. We will do this where an external agency hasn't already completed the work. Other measures to specifically reduce the threat of harm are set out in paragraphs 19 to 22.
16. We will agree the safety plan with the person and any supporting agencies. This may be required where perpetrators remain in the home or have ongoing access to enter (for instance in the case of a joint tenancy). The safety plan will set out specific details to equip the person and their family with a strategy to leave the property and go to a safe place quickly if they feel at risk of harm.
17. We will promote the opportunity for the person to remain in their home where it is their choice and it is safe for them to do so. This may involve putting in place additional security measures (see "tools and resources to reduce harm and risk of harm" below.)
18. Where we agree with the person that rehousing is the best option, we will explore other housing opportunities. We will use our risk assessment tool to monitor the risk throughout and after the move until we are satisfied, as far as we can be, that it has reduced to an acceptable level.

Tools and resources to reduce harm and risk of harm

19. We will work with the person to determine whether security measures (such as lock changes) are required to reduce or remove the risk of harm whilst they remain at home.
20. We will aim to complete emergency work within 24 hours of it being reported. If we are unable to complete works within 24 hours, we may make arrangements to temporarily move the person until the work is completed.

21. On a case by case basis, we will seek specialist advice on whether other security measures will be beneficial and/or feasible.
22. We will explore the use of new technologies to support people and manage risk. This includes promoting the use of new mobile applications to record incidents and making them available to people. People may also use these applications to access help and support services.

Working in partnership

23. Where the relevant referral requirements are met, we will liaise with the local MARAC. This is coordinated by the local authority (or police) for the area where the person is housed. We will carry out the multi-agency safety plan actions assigned to us by the MARAC. We will ensure we understand our role and the correct processes to follow.
24. We will also liaise with the Multi-Agency Public Protection Arrangement (MAPPA). We will do this where the local referral requirements are met, where we have serious concerns, or if MAPPA inform us about the matter.
25. We will actively participate in other relevant local partnerships where appropriate and we will work with specialist support agencies such as Victim Support.

Support needs and vulnerability

26. We may offer additional support such as budgeting advice to people and members of their household where an additional support need is identified.
27. We will make a child safeguarding referral to the relevant local authority when the need to protect a child/children is identified or the domestic abuse is having a negative impact on the child.
28. We will refer our concern to the police where we suspect that the nature of the domestic abuse means that modern slavery may be occurring. An example of modern slavery in relation to resident domestic abuse is financial exploitation. Financial exploitation occurs when someone inappropriately uses someone else's financial resources. In domestic abuse, it is often used as a way of having control over someone. This may become modern slavery if the person is coerced or forced to hand over control of their money for the purpose of criminal exploitation.
29. We will offer people the opportunity to access translation services or to speak to an employee of the same gender and/or sexual orientation.
30. If the person disengages from their agreed support plan, and we are aware that that places them or their family at greater risk, or the abuse is having a negative impact on the wider community, we will review what action to take to most effectively manage that risk and impact.

Action against the perpetrator

31. We will consider the legal action or remedies (both civil and criminal) available to us to deal with perpetrators of domestic abuse. We will determine, monitor and seek to understand what action is being taken by the statutory agencies in this respect, to ensure that we are working together. In circumstances where it is appropriate to do so, we may signpost perpetrators to domestic abuse perpetrator programmes.

Staff training, awareness and support

32. We will ensure that all our staff are aware of their potential role when they receive a report of a domestic abuse risk or concern, and what they must do.

33. We will provide clear guidance and training for all relevant staff on how to recognise the symptoms and signs of domestic abuse and how to report their concerns. Similarly, our contractors and agents are required to recognise the symptoms and signs of domestic abuse and to report them to Guinness.
34. Our customer-facing staff will be trained to recognise the signs of abuse and to be able to provide basic advice and support to people. This includes how people can access help and support and how they can best report further domestic abuse.

Raising resident awareness

35. As part of our commitment to deal with domestic abuse, we will provide information about domestic abuse on our notice boards and our website. We will ensure the information on our website is regularly reviewed. Our customer-facing staff will be equipped to provide information such as fact sheets/leaflets on our approach to managing domestic abuse, and will take part in awareness raising events.
36. We will provide publicity in other languages to raise awareness of domestic abuse where the need is identified.

Improving our services

37. We will record, monitor and regularly review all cases of domestic abuse to ensure compliance with our policy and procedures.
38. We will gather feedback from people who report domestic abuse, using this information to improve our services in the future.

Data protection and confidentiality

39. We will comply with our obligations under the General Data Protection Regulation (GDPR) and Data Protection Act 2018 when dealing with domestic abuse cases. This includes sharing information with statutory agencies, MARAC information sharing arrangements and MARAC operating protocols. We will handle information relating to MARAC in accordance with any relevant MARAC information sharing agreement.
40. We will share information where we are legally required to do so. All information-sharing decisions will be recorded, including the reasons for that decision.
41. We will report potentially criminal acts to the police.

Period of review

42. Our review programme is driven by service improvement initiatives, changes to legislation, regulation, evolving good practice or feedback from residents and other key stakeholders. We will review this policy on a three yearly cycle.

Key legal and regulatory references

- Family Law Act 1996
- Protection from Harassment Act 1997
- Equality Act 2010
- Anti-social Behaviour, Crime and Policing Act 2014
- Care Act 2014
- Domestic Violence Disclosure Scheme (DVDS) 2014 (also known as Clare's Law)
- Serious Crime Act 2015
- General Data Protection Regulation 2018
- Domestic Abuse Act 2021.

Related policies

- Allocations Policy
- Anti-social Behaviour, Hate Crime & Hate Incidents Policy
- Data Protection Policy
- Diversity & Inclusion Policy
- Mutual Exchange Policy
- Reasonable Adjustments Policy
- Safeguarding Adults, Children & Young People Policy.

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Policy author	Helen Hatton, Housing Policy Officer		
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Version history			
Version number	Review trigger	Date of approval	Brief description of the main changes
1.0	Requirement identified for a new policy	October 2019	This is the original version of the policy. The policy was developed to set out our approach to managing domestic abuse within Guinness homes. The policy enables us to meet our commitments under the Chartered Institute of Housing (CIH) "Make a Stand" pledge and is a requirement of the Domestic Abuse Housing Alliance (DAHA) accreditation.
2.0	Three year review cycle	June 2022	The policy has been updated to reflect the Domestic Abuse Act 2021 receiving Royal Assent. Wording has been changed in places to improve transparency and clarity. There are no material changes to the policy.

Annex 1: External initiatives and accreditation

Domestic Abuse Housing Alliance (DAHA) accreditation

DAHA is a partnership between three agencies: Standing Together Against Domestic Violence (STADV), Peabody Housing and Gentoo Housing. It was launched in 2014 with a mission is to improve the housing sector's response to domestic abuse. It developed an accreditation process that assesses individual Registered Providers (RPs) and supports them to improve their practice. DAHA accreditation is the benchmark for how RPs should respond to domestic abuse in the UK. It is also part of the Government's 'Ending Violence against Women and Girls Strategy 2016 to 2020'. In July 2018, Guinness made a commitment to work towards DAHA accreditation. The primary accreditation requirements are set out below. DAHA commitments:

1. Review your existing "Domestic Abuse and Safeguarding" policies and procedures
2. Create and implement a stand-alone Domestic Abuse policy
3. Ensure your policy includes the Government definition of domestic abuse
4. Create and implement a procedure for customers suffering domestic abuse
5. Create and implement a stand-alone Domestic Abuse policy & procedure for staff experiencing domestic abuse or ensure domestic abuse is incorporated into your HR policies
6. Ensure you support staff who deal with domestic abuse
7. Create and implement a Safeguarding Children and Adults policy
8. Ensure all your policies and procedures are reviewed every 3 years

These commitments are supplemented by detail concerning case management, risk management, equality and training.

Chartered Institute of Housing 'Make a Stand' pledge

The CIH, in partnership with Women's Aid and DAHA, developed this pledge to encourage housing providers to make a focused commitment to support people experiencing domestic abuse. One of the key commitments of the pledge is to put in place and embed a policy to support people experiencing domestic abuse. In July 2018 Executive Team agreed that Guinness should sign the 'Make a Stand' pledge.

The four commitments are:

1. Put in place and embed a policy to support residents who are affected by domestic abuse
2. Make information about national and local domestic abuse support services available on your website and in other appropriate places so that they are easily accessible for residents and staff
3. Put in place a HR policy, or amend an existing policy, to support members of staff who may be experiencing domestic abuse
4. Appoint a champion at a senior level in your organisation to own activity you are doing to support people experiencing domestic abuse.

Annex 2: Definitions

Term	Description
Coercive behaviour	This is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten a person. It is designed to make a person behave in a certain way.
Controlling behaviour	This is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain. It deprives them of the means needed for independence, resistance and escape, and regulates their everyday behaviour.
Domestic abuse	<p>Domestic abuse is defined in the Domestic Abuse Act 2021 and is summarised as follows:</p> <p><i>“Behaviour by a person towards another person where both people are aged 16 or over and are personally connected and the behaviour is abusive. Behaviour is abusive if it consists of physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological, emotional or other abuse. The behaviour may consist of a single incident or a course of conduct.”</i></p> <p>We have adopted this definition for this policy.</p>
Multi Agency Public Protection Arrangements (MAPPA)	<p>A statutory arrangement that requires the police, local authorities and the prison service to assess and manage the risk posed by sexual and violent offenders. Other agencies that can be involved in MAPPA include Jobcentre Plus, Registered Providers, strategic health authorities, Care Trusts and NHS Trusts and electronic monitoring providers.</p> <p>The principles that govern MAPPA are to:</p> <ul style="list-style-type: none"> • Identify convicted offenders who may pose a risk of harm • Share relevant information about them • Assess the nature and extent of that risk; and • Find ways to manage that risk effectively by protecting victims and reducing further harm.
Multi Agency Risk Assessment Conference (MARAC)	MARAC is a meeting between representatives from statutory, community and voluntary agencies working with victims of domestic abuse, children and the alleged perpetrator.