

Customer Domestic Abuse Policy

Scope of Policy

This policy sets out Platform Housing Group's (the Group) approach to dealing with domestic abuse.

For colleagues who have been affected by domestic abuse, there is a separate policy, entitled Domestic Abuse Policy (Employees).

Applicability

This policy applies to all Group customers regardless of tenure and household members.

1. Policy Statement

- 1.1 We firmly believe that all our customers and householders should not live in fear of violence or abuse from a partner, former partner, or any other member of their household.

This policy sets out our commitment to deal with all reports of domestic abuse effectively and efficiently. It also supports compliance with the Regulator of Social Housing's Consumer Standards, particularly the Neighbourhood and Community Standard, which require providers to work co-operatively with other agencies tackling domestic abuse and enable customers to access appropriate support and advice.

- 1.2 We will take all reports of domestic abuse seriously and will provide person centred support tailored to the needs of the individual.
- 1.3 We will work in partnership with specialist agencies, both statutory and voluntary, to develop a coordinated approach when responding to the needs of those experiencing domestic abuse.
- 1.4 Domestic abuse is a crime under the Domestic Abuse Act 2021, and also a breach of tenancy or lease.

2. Definition of Domestic Abuse

- 2.1 The Domestic Abuse Act 2021 defines domestic abuse as the following:

Behaviour of a person ("A") towards another person ("B") is "domestic abuse" if:

- (a) A and B are each aged 16 or over and are personally connected to each other, and
- (b) the behaviour is abusive.

2.2 Behaviour is “abusive” if it consists of any of the following:

- physical or sexual abuse
- violent or threatening behaviour
- controlling or coercive behaviour
- economic abuse
- psychological, emotional, or other abuse

This definition includes modern day slavery, coercive control, honour-based abuse, forced marriage and female genital mutilation (see **Appendix A**).

This definition goes well beyond intimate partner violence (IPV) in the home and recognises abuse from relatives and can include, for example, child to parent abuse. It also recognises that a child who sees or hears, or experiences the effects of, domestic abuse and is related to the person being abused or the perpetrator, is also to be regarded as a victim of domestic abuse in their own right.

Abusive behaviour can be a one off or multiple incidents.

Whilst both men and women may experience domestic abuse, women and girls are disproportionately affected and are more likely to experience repeated and severe forms of abuse.

3. Definition of Harm or Abuse

3.1 This is not an exhaustive list. For further examples of abusive behaviour, please see section below and **Appendix A**.

3.1.1 Physical abuse can include assault, hitting, slapping, pushing, kicking, misuse of medication, being locked in a room, inappropriate sanctions or force-feeding, inappropriate methods of restraint, and unlawfully depriving a person of their liberty.

3.1.2 Sexual abuse can include rape and coerced sex, forcing a victim/survivor to take part in unwanted sexual acts, refusal to practice safe sex or use contraception, indecent exposure, sexual harassment, inappropriate looking or touching, sexual photography, subjection to pornography or witnessing sexual acts, sexual exploitation.

3.1.3 Coercive behaviour is an act or pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim. Victims of coercive control can have every aspect of life controlled by their partner, often being subjected to daily intimidation and humiliation. This can also include forced marriage and so called ‘honour-based abuse’.

3.1.4 Controlling behaviour includes a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capabilities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

- 3.1.5 Psychological and emotional abuse can include isolation from support networks or services, gaslighting, use of threats, humiliation, blaming, telling them they are stupid, hopeless, unlovable, that no one would believe them, or that they are a bad parent.
- 3.1.6 Economic abuse can include controlling money and bank accounts, making a victim account for all their expenditure, running up debts in the victim's name, allowing no say on how monies are spent, refusing to allow them to study or work, refusing access to joint bank accounts or making fraudulent benefit claims in the victim's name.

4. Our Responsibility

- 4.1 We recognise it can be challenging for victims/survivors to disclose information regarding domestic abuse. We will:
- take a person-centred approach in responding to cases of domestic abuse to try and minimise any danger to them. A victim's disclosure alone is sufficient for them to be given priority advice and assistance in an empathetic, supportive and non-judgemental way.
 - be guided by the victim/survivor in determining the most appropriate course of action, considering what the person experiencing the abuse wants and feels, together with the severity of the abuse and any additional criminality. This will also include offering support to extended family members.
 - make sure all our services are accessible and range of options are available for reporting domestic abuse. Information will be supplied in other languages and interpreters and translation services will be arranged to ensure we do not create any unnecessary barriers to report domestic abuse and make our services accessible and inclusive to all.
 - recognise that survivors' experiences of domestic abuse may be in part defined by their background and understand that certain individuals may face multiple and intersecting forms of discrimination and will recognise this intersectionality and tailor our service accordingly.
 - respect that victims/survivors of abuse may wish to speak to be supported in a neutral and safe venue by an employee of the same gender and/or similar ethnic or cultural background.
 - ensure that we consider communication needs and make the necessary adjustments when offering support to those experiencing domestic abuse.
 - make safeguarding referrals for children where appropriate (following the relevant safeguarding procedures), to ensure that children and young people, who are affected by domestic abuse, have access to services as early as possible.

- make safeguarding referrals for adults (following the relevant safeguarding procedures) where we believe a vulnerable adult with care and support needs is at risk due to an abusive relationship.
- carry out robust partnership working with other relevant agencies to support victims/survivors of domestic abuse to rebuild their lives, e.g., Women's Aid, police, or other community-based specialist services.
- carry out target hardening in conjunction with partner agencies to enhance the security of a property should a victim wish to remain in their home.
- fully comply with the conditions contained within the Data Protection Act 2018 unless it is clearly demonstrated that there are Safeguarding issues, in respect of either adults or children at which point we would, irrespective of any victim consent, make the necessary referrals.
- ensure that our employees, who may encounter incidents of domestic abuse, receive appropriate training to deliver person centred advice and support that takes into consideration cultural and other needs of affected victims.
- establish and support a Stay Safe Steering Group to promote and raise awareness of domestic abuse.
- take appropriate action against individuals responsible for domestic abuse, recognising that it is both a criminal offence and a breach of tenancy or lease conditions.
- review our processes to ensure they are trauma-informed and avoid placing victim/survivors in unnecessary or repetitive procedures. Our approach will be person-centred, prioritising the needs and experiences of those affected. We will actively consult with our customers to ensure our processes reflect their voices, and we will create meaningful opportunities for them to influence the design and delivery of our services.

These responsibilities align with the expectations set out in the RSH Consumer Standards, ensuring we provide safe, secure, and supportive housing environments.

5. Supporting Victims/Survivors of Domestic Abuse

5.1 We will:

- listen to the victim/survivor's voice when determining the most appropriate course of action and empower them to make decisions and be involved in the solutions to keep them protected.

- carry out target hardening in conjunction with partner agencies to enhance the home security should they wish to remain in their home.
- give clear and concise advice on their housing options, signpost them to specialist agencies for additional support and actively liaise with these agencies to ensure victim/survivor led and safe.
- consider a management move to an alternative address should it be clear it is unsafe for them to remain in their current home. The management move process would need to be followed.

6. Responding to Reported Abusers

6.1 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 reported abusers 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 have caused to the home.
- Where appropriate, refer or signpost the reported abuser to intervention programmes or other specialist behaviour changes services.

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

7. Compliance

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

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

Cases are regularly monitored. Audits and pre-closure checks are completed to ensure cases are appropriately managed. We hold regular surgeries for colleagues to attend and ensure advice and support is readily available to the officer dealing with the case.

8. Stakeholders

- 8.1 Domestic abuse cannot be dealt with by any one organisation or agency working in isolation.
- 8.2 We will work in partnership with a variety of specialist agencies, the local authority and statutory organisations so our customers receive the protection and support they need.

The Group does not directly provide legal advice or counselling services, but we will ensure our employees have a good local knowledge and work closely with stakeholders such as social services, health and voluntary and specialist agencies such as Women's Aid.

High risk cases will be referred to the Multi Agency Risk Assessment Conference (MARAC). This is a regular local meeting to discuss how to help people at high risk of murder or serious harm. Agencies in attendance are Independent Domestic Violence Advisor (IDVA), police, children's social services, health and other relevant organisations.

9. Information Sharing

- 9.1 In safeguarding contexts, the sharing of personal information without the individual's consent is permitted under the **UK General Data Protection Regulation (UK GDPR)**, the **Data Protection Act 2018**, and the **Data (Use and Access) Act 2025**, provided that specific conditions are met.

Information may be shared without consent when:

- **The public interest in safeguarding** a child or adult at risk outweighs the public interest in maintaining confidentiality.
- **A lawful basis exists** for sharing information, including the safeguarding of children and individuals at risk. This includes circumstances where sharing is necessary to protect someone from neglect or physical, mental, or emotional harm, or to promote their well-being.
- **The sharing is necessary and proportionate**, and the information is:
 - Relevant and limited to what is required.
 - Accurate and up to date.
 - Shared only with individuals who need to know.
 - Shared in a timely and secure manner.
- **Transparency and accountability** are maintained. While consent is not required in safeguarding cases, practitioners should inform individuals about the sharing of their data where it is safe and appropriate to do so. If informing them would increase the risk of harm, this step may be omitted.

- **Records must be kept of:**
 - The decision-making process.
 - What information was shared.
 - With whom it was shared.
 - The purpose of the sharing.

This approach aligns with the statutory guidance outlined in **Working Together to Safeguard Children (2023)**, which emphasises effective multi-agency collaboration and child-centred practice.

10. Diversity and Inclusion

- 10.1 We have completed an equality impact assessment for this policy.
- 10.2 We will make sure all our services are accessible and range of options are available for reporting domestic abuse. Information will be supplied in other languages and formats as required. Interpreters and translation services will be arranged to ensure we do not create any unnecessary barriers to report domestic abuse and make our services accessible and inclusive to all.
- 10.3 We are committed to fairness and equality for all regardless of economic status, race, ethnicity, nationality, gender, sexual orientation, marital status, disability, age, religion, ethnic group or immigration status.

We recognise that survivors' experiences of domestic abuse may be in part defined by their background. We understand that certain individuals may face multiple and intersecting forms of discrimination and will recognise this intersectionality and tailor our service accordingly.

11. Complaints

- 11.1 We aim to meet the needs of our customers by providing an excellent service. However, it is acknowledged that occasionally things go wrong and customers may wish to complain. Should the need arise to make a complaint, please refer to our Complaints, Comments and Compliments Policy.

12. Monitoring and Review

- 12.1 Key performance information will be provided to the Senior Leadership Team which will determine the effectiveness of this policy.
- 12.2 This policy will be reviewed every three years or on the introduction of new legislation, best practice guidelines or operational changes, whichever is sooner.
- 12.3 Approved documents are valid for use after their approval date and remain in force beyond any expiry of their review date until an updated version is available.

13. Associated Documents

13.1 List of documents - associated policies, procedures and publications:

- Domestic Abuse Act 2021
- Housing Act 1996 – Part 7
- Family Law Act 1996 – Part IV
- Protection from Harassment Act 1997
- Children Act 1989
- Anti-social Behaviour, Crime and Policing Act 2014
- Crime and Disorder Act 1998
- Serious Crime Act 2015
- Police and Justice Act 2006
- Human Rights Act 1998
- Data Protection Act 2018
- Homelessness Act 2002
- Homelessness Reduction Act 2017
- Equality Act 2010
- Protection of Freedoms Act 2012
- Care Act 2014
- Domestic Violence Disclosure Scheme (DVDS – also known as Clare’s Law)
- Regulator of Social Housing - Consumer Standards: Tenancy and Home
- Safeguarding Vulnerable Adults and Children Policy and Procedure
- Lettings Policy
- Managed Move Policy
- Anti-Social Behaviour (ASB) Policy and Procedure
- Domestic Abuse Policy (Employees)

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Appendix A

Customer Domestic Abuse Policy

Further Definitions

Verbal Abuse - use of language to demean, threaten, or control.

Examples: shouting or yelling - insults or derogatory comments - threats of violence or abandonment - racist, sexist, or homophobic slurs.

Technology-Facilitated Abuse - use of digital tools to harass, monitor, or control.

Examples: GPS tracking or spyware on devices - sharing or threatening to share intimate images - online stalking or harassment - controlling social media accounts.

Abuse Related to Faith or Belief - using religious or cultural beliefs to justify or enforce abusive behaviour.

Examples: forcing religious practices - using faith to control or shame - preventing someone from practicing their beliefs - misusing religious texts to justify abuse.

Honour-Based Abuse - violence committed to protect perceived family or community honour.

Examples: forced isolation or punishment for perceived dishonour - physical violence for refusing marriage or relationships - threats or actual harm for dressing or behaving “inappropriately”.

Forced Marriage - marriage without free and full consent of one or both parties.

Examples: threatening or pressuring someone into marriage - emotional blackmail or coercion - arranging marriage for immigration or financial gain.

Female Genital Mutilation (FGM) - partial or total removal of female genitalia for non-medical reasons.

Examples: performing FGM on a child or adult - arranging for FGM abroad - pressuring someone to undergo FGM.

Abuse by Family Members - abuse from relatives other than intimate partners.

Examples: elder abuse by adult children - sibling violence - abuse by in-laws or extended family.

Teenage Relationship Abuse - abuse within romantic relationships involving individuals aged 16–19.

Examples: controlling behaviour via social media - emotional manipulation or threats - physical violence during arguments.

Child-to-Parent Abuse - harmful behaviour by children toward parents or carers.

Examples: physical aggression or threats - emotional blackmail or intimidation - property damage or theft.

Modern Day Slavery - covers a set of specific legal concepts including forced labour, debt bondage, forced marriage, slavery and 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.

MARAC - Multi Agency Risk Assessment Conference - 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.