



Domestic Abuse Policy

Approval date April 2019
Review date April 2022



LINK

This policy applies to

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| <input checked="" type="checkbox"/> Link Group | <input checked="" type="checkbox"/> Link Housing | <input checked="" type="checkbox"/> Link Living | <input checked="" type="checkbox"/> Link Property |
| <input checked="" type="checkbox"/> Horizon | <input checked="" type="checkbox"/> Larkfield | <input checked="" type="checkbox"/> West Highland | <input checked="" type="checkbox"/> Lintel Trust |

Policy Summary

This policy has been developed to reflect and recognise the introduction of the Domestic Abuse (Scotland) Act 2018 and the impact on Link customers and staff.

The Policy formalises the approach and method to be taken by Link when dealing with people who are experiencing domestic abuse.

Equalities

The operation of this policy will always be in accordance with Link Group's Equality, Diversity and Inclusion policy. An equality impact screening assessment has been completed to ensure proper consideration of the impact of the policy on protected groups.

Privacy

This policy complies with Link Group's Data Protection and GDPR policies

Policy Owner
Director of Housing
Services

Review Manager

Approved By
Senior Management
Group



1. INTRODUCTION

This policy is part of Link's Antisocial Behavior Strategy that sets out how we address diverse forms of antisocial behavior, including abuse. This document explains in particular, a framework of principles for addressing domestic abuse.

This is a key policy to reflect the aims of the Domestic Abuse (Scotland) Act 2018 that came into force in February 2018. This Act makes domestic abuse, whether physical or emotional, criminal in nature. A plain language summary of the law is provided in Appendix 1.

2. SCOPE

The Domestic Abuse Policy extends to all applicants, tenants, service users and non-tenants living with Link tenants.

The principles of this Policy are incorporated into a number of organisational procedures, for example, housing management. This ensures that we address any form of domestic abuse as part of our mainstream services.

This policy's principle of providing support also applies to employees of Link Group Limited and its subsidiary companies, including Directors and the Chief Executive. Such support will be provided through our human resource procedures and access to support via our employee assistance programme.

Note: We use the word "tenant" for all customers of Link; and Link is used to cover all of Link's companies.

3. PRINCIPLES

This section describes the key policy principles that regulate organisational services in relation to domestic abuse.

- **Law and guidance**
We promote good practice when addressing domestic abuse experienced by our tenants and employees.
- **Information and advice**
We provide clear information and advice to persons who approach us due to domestic abuse about their rights. We may work in partnership with other organisations to achieve this objective.
- **Equality and diversity**
We consider equality issues when addressing domestic abuse, for instance, making reasonable adjustments for disabled people such as providing interpreters for people with a hearing impairment.



- **Staff training**
We provide staff training on how to recognise and address domestic abuse incidents which is one of the key areas covered within the Antisocial Behavior Strategy.
- **Working in partnership**
We work with partner organisations to address incidents of domestic abuse, for example, Police Scotland; this is done in liaison with people affected by abuse.
- **Managing performance**
We monitor incidents of domestic abuse and what actions we have taken to address such abuse. This data will inform our practice to enable us to learn and improve the support we can provide.

4. APPROACH AND METHOD

This section describes the key practices that we implement to address incidents of domestic abuse.

These practices are mainly derived from our Antisocial Behavior Strategy that explains how to address any form of antisocial behavior, including abuse and harassment.

We apply a diverse range of remedies, including management and judicial remedies. The remedy applied is based on a detailed assessment of each incident considered against possible options to resolve individual cases.

In cases that involve crime such as domestic abuse, we would advise tenants of their rights and the importance of contacting Police Scotland without delay.

This section describes some of the key activities that are taken to address incidents of domestic abuse for our tenants

These are part of the procedures relating to the following activities:

- allocations;
- antisocial behavior strategy;
- estate management;
- harassment (equality and diversity); and
- repairs and maintenance.

4.1 Support to tenants

The main activities to address domestic abuse are summarised below:

We will:



- attempt to identify those experiencing domestic abuse before a tenancy begins and ask about any history of domestic abuse at pre allocation stage. If a history is disclosed, we will consider additional security measures.
- enable tenants to report domestic abuse to us in ways suitable to them, including in person, in writing, by telephone, email, customer app or through a third party. Examples of third parties are police officers or an Independent Domestic Violence Advocate (IDVA).
- ensure that tenants experiencing domestic abuse know that they can meet staff in confidence at our offices, or at an agreed choice of safe venue. Meetings can be arranged in locations that are accessible to the person's needs.
- carry out a risk assessment for staff in accordance with Link Group's Health and Safety and Lone Working policies.
- respond and participate – on persons' behalf - with relevant partner agencies, for instance, health professionals, social work, Police Scotland and so on. This is done with the agreement of the person experiencing domestic abuse.
- agree an action plan with all parties concerned, monitor the situation and review at a frequency agreed with them.
- provide improved security to the property, if required and whenever possible, such as installation of security lights and stronger window locks.
- support tenants experiencing domestic abuse access appropriate services as early as possible and are given advice to allow them to make choices about what to do next.
- support tenants experiencing domestic abuse to sustain their tenancy by working with them and other support agencies.
- ensure that, if children, young people and or vulnerable adults are affected by domestic abuse, they can access services as early as possible thus meeting Link's Child Protection and Adult Protection Policy. Reference to these policies will provide further detail on actions to be taken.
- provide domestic abuse awareness training for all frontline staff as part of the Antisocial Behaviour Strategy training.
- publicise our approach, both in print and digitally, to raise awareness amongst staff and tenants, as well as the broader community, in order to increase reports of domestic abuse (see note).
- publish information in formats that are accessible to tenants and other customers.



Note: We publicise information through our website, but also provide information about this policy at other locations so that it is available to people from both the public and private sectors.

4.2 Responding to a report of domestic abuse

On receiving a report from any tenant experiencing domestic abuse, we offer a personal discussion within a reasonable time scale. If possible, this will be within twenty four hours.

Whenever this is not possible due to a weekend or bank holiday, we will:

- refer the person to a relevant support agency; or
- contact her/him/them on the next available working day.

We can also provide telephone interviews, on request. If possible, we will offer same sex interviews, on request, as well as taking account of other preferences. For example, someone might want to have a discussion with a younger or older woman. Where support is required to aid communication for example, translation services, this will be provided.

If a report of domestic abuse is received through a third party, for instance, Police Scotland, then we will:

- seek to establish what details have been taken;
- identify what support has been provided; and
- clarify what action is expected from us.

If required, we will contact the person directly and offer an interview as above.

We ensure that interviews take place in confidential settings and that staff who conduct such interviews have received appropriate training.

In such situations, our staff know it is important to:

- empathise with people experiencing harassment;
- listen attentively and objectively to the details of each case; and
- assess critically all possible options and remedies.

Note: If an employee advises us about domestic abuse, then this will be addressed through support from the appropriate line manager and/or colleagues in Human Resources. We will provide advice and support in confidence, including referrals to agencies/organisations that can offer practical support.

4.3 Staff training

We provide a diverse range of training courses for employees relating to antisocial behaviour. This includes personal and unacceptable personal forms of antisocial behaviour such as domestic abuse.

The type of training that we provide is determined by the roles of staff in dealing with incidents of domestic abuse. Training covers various activities such as:

- consciousness raising about the nature and frequency of domestic abuse;
- how to deal with abuse incidents effectively;
- providing information and advice, for example, about the remedies available for addressing abuse; and
- reporting domestic abuse and evaluating data to improve services to people experiencing domestic abuse.

5. MONITORING OF THE POLICY

The Senior Management Group [SMG] in its formal approval of the policy acknowledges that it accepts full responsibility for its implementation. Day-to-day responsibility for the operation of this policy lies with the appropriate directors and managers of the Link group of companies. All relevant employees have a responsibility to ensure that this policy is applied as instructed.

Any matter which demonstrates a serious failure of internal controls should be reported immediately to the Chief Executive.

We monitor both quantitative and qualitative issues:

- **Quantitative issues**
We monitor numbers of incidents of domestic abuse and by location/area.
- **Qualitative issues**
We monitor the quality of information and advice that we provide to people experiencing domestic abuse.

We monitor the types of domestic abuse using equality issues, for example, numbers of incidents involving women and men (including same sex couples/partners), disabled people and people from black and minority groups.

6. COMPLAINTS AND APPEALS

Link Group welcomes complaints as these provide information to help us to improve our services. We use a complaints handling procedure (CHP) developed by the Scottish Public Services Ombudsman (SPSO) and supported by the Scottish Housing Regulator.



The CHP allows for most complaints to be resolved by front line staff within a five day limit (first stage). If the complaint is complex, a detailed investigation will be made by a manager within a twenty day limit (second stage).

At the end of the second stage, our response will be made by a director. If the customer remains dissatisfied, she/he/they may then refer the matter to the SPSO.

At each stage, Link Group will advise the customer how the complaint will be taken forward and which agency is most appropriate to deal with the complaint.

Anyone receiving care or support service from us has the right to complain, either directly to the Care Inspectorate or to us.

Note: The SPSO does not normally review complaints about our factoring service. If a factoring customer is dissatisfied after using the CHP, the complaint may be referred to the First-tier Tribunal (Housing and Property Chamber).

Any employees who are dissatisfied with Link's application of this policy in its role as an employer should address any concerns via the Grievance Policy.

7. POLICY AVAILABILITY

A summary of this policy can be made available in a number of other languages and other formats on request.

8. POLICY REVIEW

Link Group undertake to review this policy regularly, at least every three years, with regard to:

- applicable legislation, rules, regulations and guidance;
- changes in the organisation; and
- continued best practice.

Where appropriate we will also consult with our tenants, housing applicants and other organisations in accordance with our Tenant Participation Strategy.

Appendix 1: Summary of law

This section provides plain language guidance regarding the Domestic Abuse (Scotland) Act 2018. It is not intended, though, as a precise statement of law.

It also provides plain language guidance on some key terms; these are not precise legal definitions.

The Domestic Abuse (Scotland) Act 2018, section 2, defines abusive behaviour as behaviour that is violent, threatening or intimidating and the purpose one or more of the following effects:

- making a partner dependent or subordinate;
- isolating a partner from friends, relatives or other sources of support;
- controlling, regulating or monitoring a partner's day-to-day activities;
- depriving a partner of, or restricting, their freedom of action; and
- frightening, humiliating, degrading or punishing a partner.