

Domestic Abuse Policy

Approved by Wheatley Group Board April 2017
Updated July 2022

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Approval body	Group Board
Date of approval	25 August 2022
Review Year	2025
Customer engagement required	Yes
Trade union engagement required	No
Equality Impact Assessment	Yes

Record of Amendments

Date Approved by Wheatley Group Board and Designated as a Group Policy	26 th April 2017
Date Amended	1 st April 2019
Date Reviewed	July 2022
Amendments	
Revised Definition of Domestic Abuse and inclusion of Coercive and Controlling Behaviour	Section 2
Revised wording to reflect creation of Wheatley 360 and revised roles	Section 6
Revised to include GDPR and Domestic Abuse (Scotland) Act 2018	Section 8
Revised to include GDPR	Section 12
Revised to update current Group Strategy	Section 1, Section 3.2, Section 6, Section 6.1, Section 6.2, Section 7
Revised to bring Domestic Abuse statistics up to date and provide further context around some of the key figures	Section 1
Revised to outline the strong position Wheatley Group play in early intervention and supporting victims before they are ready to report to Police	Section 1
Revised to amend wording in relation to our role in supporting perpetrators address their behaviour to ensure staff are clear on this, as any work with perpetrators can have unintended consequences for victims if not applied correctly	Section 1
Revised to include information around staff being impacted by domestic abuse and that our HR polices support this, as well as staff within the Group Protection and Employee Relations teams	Section 1
Revised to update new legislation implemented within Scotland to take cognisance of the criminalisation of psychological abuse and coercive control behaviours	Section 2
Revised to strengthen section on examples of types of domestic abuse	Section 2.2
Revised to include our sector leading training for staff in Domestic Abuse and communications and engagement strategy to support our prevention activity	Section 3.2
Revised our role in supporting domestic abuse to incorporate all additional work undertaken in this area (eg attendance at MARAC) and ways in which information can be received	Section 4
Revised to clarify that referrals for support to specialist services will be with the victims consent and that they will	Section 4

always be dealt with in an empathetic and trauma informed manner	
Updated to reflect process of sharing information with Police Scotland Domestic Abuse Investigation/Safeguarding Units	Section 5.1
Revised the section to clarify that it is special bail conditions referred to and not standard bail conditions and updated to reflect exactly what this entails	Section 5.2
Revised section on Non Harassment Orders to focus on the process for criminal courts, which primarily involves the perpetrator and not wider family members, which usually only occurs in civil courts	Section 5.3
Revised to reflect updated National Child Protection Guidance recently published in 2021	Section 5.4
Revised to advise frontline staff to contact the Group Protection Team for further support, advice, and guidance	Section 5.4, Section 5.5
Revised to incorporate changes to structure from being one post of Group Protection Liaison Manager to Group Protection Team	Section 5.1, Section 6.1
Revised to reflect business change to Wheatley Care	Section 6.3, Section 6.6
Revised to incorporate work through multi-agency forum and meeting attendance to share intelligence in relation to domestic abuse	Section 6.4
Revised to update current partnerships relative to domestic abuse	Section 6.5
Revised to provide details of the Safe and Secure Service now it has launched since last iteration of policy and also role of Fire Safety Officers in process. Also inclusion of our DGHP subsidiary with their in house repairs team.	Section 6.7
Revised to bring section on the Wheatley Foundation up to date with activity across Group	Section 6.8
Revised to ensure inclusivity by referring to individuals as opposed to specific genders; and include information that we attend DSDAS in some areas across Group	Section 6.9
Updated with a new section to provide details of our bespoke training on offer for staff in recognising and responding to domestic abuse	Section 6.10
Update to legislation section to take account of new domestic abuse legislation due to come into force	Section 8
Revised to reflect change of terminology from 'significant case review' to new term for process of 'learning review'.	Section 9
Removed reference to 'My Contribution' and updated to new system - My Appraisal; and amended wording to incorporate collaborative working between Group Protection Team and Wheatley Academy and Group Protection activity	Section 10
Updated to confirm Performance Management Framework established and utilised to monitor trends	Section 11

Revised to incorporate the correct section of the Group GDPR policy that must be considered which is appendix 2 and not appendix 3	Section 12
Revised to remove specific CoE's this work feeds in to, as it has expanded and is further reaching now and crosses the network of CoE's.	Section 13
Deletion of reference to complaints procedure being available at local offices in line with new operating model	Section 14
Section added to include reference to data and information provided throughout the document	Endnotes

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1. Introduction

The Wheatley Group's (The Group) Domestic Abuse Policy is part of a suite of policies within our Protecting People Policy Framework (PPPF). The PPPF is our Group wide approach to keeping our communities safe and provides us with a strong platform for sharing learning and best practice across all subsidiaries. The other policies within the framework are:

- Child Protection;
- Adult Support and Protection; and
- Multi Agency Public Protection Arrangements (MAPPA)

The strategic aim of all policies within our PPPF is to ensure that: *we work with customers, staff, and partners to make homes and lives better and safer for all, and that we design and deliver services to minimise the risk of harm and abuse within our communities.*

Our ability to work with our communities to prevent and respond appropriately to their priorities will be key to achieving our Your Home, Your Community, Your Future vision of cementing our reputation as one of the UK's leading customer focused organisations.

Our customers have told us that feeling safe and secure in their home and community is extremely important to them and this, in turn impacts on local demand and community stability. Our PPPF, and the suite of policies within it, support our customers' priority of feeling safe and defines our role in achieving that outcome.

We know that domestic abuse has been and continues to be a significant issue within our communities. There were 65,251 incidents of domestic abuse reported to Police Scotland during 2020-2021, where 80% of the victims were female. These figures show an increase in 4% from the previous year and is the fifth year in a row the figures have recorded an increase ¹. It is important to recognise however, that these figures illustrate reported incidents to Police Scotland, but do not capture the full picture of domestic abuse given it is vastly underreported. It is a well-established fact that there can be numerous incidents take place before a victim reports Domestic Abuse to Police, and Wheatley Group staff will engage with many of these victims well before they get to the point of reporting. We are therefore in a unique position to be able to consider early intervention opportunities and support victims of domestic abuse long before they are ready to report to Police.

Crucially for Wheatley, as Scotland's leading housing, care, and property management group, 91% of all incidents within 2020-2021 occurred within a home or dwelling, highlighting the key role to be played by housing providers in dealing with domestic abuse within communities.

Following the Domestic Abuse (Scotland) Act 2018 coming fully into force on 1st April 2019, there were 1,641 crimes recorded under this legislation for 2020/21, 94% of which involved a female victim (1,545) ² (further details on this new legislation covered later in the document).

Whilst the true scale of domestic abuse in our communities will always be hard to measure given the vast levels of under reporting, we know it happens in all communities, irrespective of tenure or socioeconomic profile. It is common knowledge that women and girls are disproportionately affected by domestic abuse, however it can and does occur regardless of gender, age, disability, gender reassignment, race, religion, or belief, sexual orientation, or relationship status (marriage, civil partnership, partners, or ex partners).

In measuring the impact of domestic abuse incidents reported in our communities, we utilise the Wheatley Business Intelligence Toolkit, which provides an analysis of Police incidents either in, or within 25 metres of our properties. Analysis of Police incidents over the 24 week period (29th September 2021 – 6th March 2022) shows that there were 1,599 domestic incidents reported to police during this timeframe. It is one of the main reasons for police to call at our properties.

As the sector leading housing and care provider, we are well placed to recognise the signs of domestic abuse and respond appropriately. To deliver our vision of providing excellent customer service, it is essential that we take all reports of domestic abuse seriously and work positively and proactively with the victim / survivor to offer person centred support.

In addition, we recognise that we have an important role to play in considering how to support perpetrators who wish to desist from this conduct, by helping them to access support and assistance (eg access to suitable housing, wraparound financial support, employability options).

Through the development, implementation, and monitoring of our Domestic Abuse Policy, along with the other policies in our PPPF, we will define what it really means to keep our communities safe and set sector leading standards in Group Protection service areas.

This Domestic Abuse Policy provides information to customers, staff, and partners in relation to how we will work across our subsidiaries and with partners to support and protect people in our communities who are affected by domestic abuse.

We recognise that some staff will also be impacted by domestic abuse and our HR policies reflect and take cognisance of this. The Group Protection Team work closely with our People Services and Employee Wellbeing colleagues to assist any staff affected and ensure access to the appropriate wraparound services, signposting and support as required.

2. What is Domestic Abuse?

Domestic abuse is not only physical abuse, it takes many forms including physical, sexual, economic/financial, emotional, or psychological abuse. Coercive and controlling behaviours, some of which are described in Section 2.2, underpin domestic abuse; they are a range of purposeful behaviours including intimidation, isolation, emotional abuse, and manipulation. These behaviours are often the mechanisms for achieving power and control in an abusive relationship and reinforce the threat or reality of physical abuse.

On 1st April 2019, legislation came into force in Scotland that made coercive control criminal and allowed for this to be prosecuted under the Domestic Abuse (Scotland) Act 2018.

2.1 Definition of Domestic Abuse

For the purposes of this policy, we will use the Police Scotland and Crown Office and Procurator Fiscal Service nationally agreed definition of domestic abuse:

'Any form of physical, verbal, sexual, psychological, or financial abuse which might amount to criminal conduct, and which takes place within the context of a relationship. The relationship will be between partners (married, cohabiting, civil partnership or otherwise) or ex-partners. The abuse may be committed in the home or elsewhere including online'.

2.2 Examples of Domestic Abuse

Domestic abuse can take a number of different forms, some of which are listed below, with examples of behaviours associated with each one:

Physical abuse includes: All types of assault and physical attacks like hitting (including with objects), punching, kicking, and burning.

Sexual abuse includes: Sexual abuse is a continuum and includes a wide range of acts including sexualised name calling, unwanted sexual demands, threats, force or intimidation to obtain sex, deliberately inflicting pain during sex, combining sex and violence, using weapons, forcing their partner or ex-partner to engage in sexual acts and Rape.

Psychological/emotional abuse includes: Threats (including threats of violence); criticism and name calling; controlling what the victim does, where they go and who they speak to; threatening their children, isolating them from friends and family; accusing them of being unfaithful or threats to post nonconsensual intimate media online (often referred to as revenge porn). These tactics can be used in different ways with different client groups, e.g. threatening to 'out' sexual orientation to family, friends or work or to reveal their HIV/AIDS status; or isolation of a BME woman who is not permitted to learn English.

It is isolation from support and access to services, making the victim dependent upon the perpetrator for support; humiliation; degradation; exploitation; regulation of behaviour, and deprivation of independence and human needs.

Economic/Financial abuse includes: Controlling money and bank accounts; making a victim account for all their expenditure; running up debts in a victim's name; allowing no say on how monies are spent, refusing to allow a victim to work or enter education, stealing the victim's money, or insisting all economic assets are in their name (e.g. sole tenancy as opposed to a joint tenancy).

Stalking and harassment includes: Unwanted attention or behaviour for example, telephone calls, texts or more threatening behaviour, such as appearing at victim's homes or workplace unannounced or unwarranted. It could be watching or monitoring someone, either physically or online.

3. Policy Aims and Objectives

3.1 Our Aim

We will work with customers, staff, and partners to make homes and lives better and safer for all. We will design and deliver services to support those affected by domestic abuse.

3.2 Our Objectives

We will achieve our aim and strategic vision by successfully implementing the following objectives across all subsidiaries:

- Where possible we will implement processes to **prevent** situations where domestic abuse could occur, for example making referrals to police under the Disclosure Scheme for Domestic Abuse Scotland;
- We will ensure our policies are **fit for purpose** and promote wider prevention activity at both a local and national level;
- We will have a clear **Communications and Engagement Strategy** to support our prevention activity and facilitate getting key messaging in this area out across our networks;
- We will build robust **risk mitigation** processes into our policies, for example, we will ensure our Information, Advice and Letting Policy Framework supports those affected by domestic abuse;
- We will work in **partnership** with relevant organisations and proactively work to develop those relationships with the vision of creating strategic partnerships;
- We will embed a culture of **early intervention**. For example, our housing officers and environmental operatives have intimate knowledge of our communities and are therefore in a unique position to be alert to early indications of domestic abuse within a household;
- Through our Your Home, Your Community, Your Future Strategy, we will continue to inspire and empower our staff to develop **innovative solutions** to support our individual customer's needs;
- We will **raise awareness** of domestic abuse and ensure everyone who is employed or involved in our organisation is aware of the importance of responding appropriately and supporting our customers. Leaders within the organisation will support and promote this;
- Our staff will receive **training** to the highest standard utilising the domestic abuse specialist services sector to work with our Wheatley Academy to facilitate this;
- Through our groundbreaking **W.E. Care** approach we will ensure we are in a unique position to access support for all customers; and
- Our approach will strike the balance of being sufficiently **flexible** to ensure we have our customers at the heart of our processes, while ensuring a level of consistency in the implementation of this policy.

4. Our Role

Our role as a leading housing and care organisation in responding to domestic abuse, is around awareness and identification, followed by tailored support to the customer in a way that responds to their needs and supports their safety. Once cases of domestic abuse have been identified within our properties, we will utilise our specialist trained staff to engage with our customer to ensure they receive access to our sector leading

internal wraparound support services, as well as signposting to identified agencies or organisations, utilising established referral pathways to support.

In certain circumstances it may also be appropriate to report our concerns to Police Scotland and / or the relevant Local Authority Social Work Department (see section 5. Reporting Concerns).

As soon as we are alert to possible abuse within a household it is extremely important that our response is appropriate. We may become aware of domestic abuse from a number of sources, these include:

- Disclosure by the customer;
- Disclosure by a third party;
- Attendance at a multi-agency forum such as the Multi-Agency Risk Assessment Conference (MARAC), Multi-Agency Tasking and Coordination forum (MATAC) or Disclosure Scheme for Domestic Abuse Scotland forum (DSDAS);
- Identification by a neighbour or another customer hearing/witnessing the abuse;
- Identification by a member of staff; or
- Identification through customer insight from ASTRA

Regardless of how we become aware of the domestic abuse, we will obtain as much information as possible (if it is safe to do so) in order to inform our response and take any necessary action. Anyone who approaches us and discloses they are affected by domestic abuse can expect the following response:

- Our starting point will be that we will believe them;
- A victim's disclosure alone is sufficient for them to be given advice and assistance as a matter of priority for staff;
- With the victims consent, we will signpost and proactively refer to specialist support agencies;
- We will offer suitable interview provisions including accessible venue, same sex interviews and translation service if necessary;
- We will ensure that anyone experiencing domestic abuse is treated in an empathetic, supportive, non-judgemental and trauma informed way; and
- All disclosures of abuse will be treated confidentially, the key exception to this being situations where there is reason to believe that there may be a risk of harm to others and information requires to be passed on. We will reassure the customer and explain why the information must be shared.

5. Reporting Concerns

- 5.1 Within Wheatley we have developed Community Information Reports. It is the mechanism through which we share information / intelligence with Police Scotland through defined procedures. While this is actively encouraged, it should not be used as a substitute for calling police where there is a threat or risk of harm to our customers in relation to Domestic Abuse and a Police response is required. Staff should report this in using 101 or 999 depending on the circumstances (999 always for emergency situations).

If we are passing on concerns reported to us by a third party (eg neighbour) or disclosures by the victim, it is good practice to advise the person making the disclosure that concerns are being reported, but that may not always be possible. If staff are in any doubt, they should discuss this with their line manager or the Group Protection Team.

Our Group Protection Team work closely with Police Scotland Domestic Abuse Investigation/Safeguarding Units where we have a stock footprint and will share information through these established strategic partnerships to support the risk assessment and safety planning of customers impacted by domestic abuse. This mechanism will never be used as a substitute for calling police where there is any threat or risk of immediate harm.

Details of other circumstances where staff should report concerns to Police Scotland and / or Social Work, are detailed below:

5.2 Special Bail Conditions

Special Bail Conditions can be imposed by the criminal court during the criminal court process for Domestic Abuse, to minimise any further risk of harm to the victim during this process (eg not to enter an address or contact an individual). Special Bail Conditions may come either with or without electronic monitoring.

It is the responsibility of Police Scotland to enforce any domestic abuse special bail conditions relating to perpetrators. They can do this by carrying out unannounced visits to places from which they are excluded. Police will also conduct regular enquiries to ensure perpetrators do not make contact with anyone specifically named in special bail conditions.

In the event that any member of staff becomes aware of a breach of bail, our priority is the safety of the victim. Should we become aware of a breach of bail or potential breach of bail this will be reported to police immediately either via 101 or 999 depending on the circumstances.

5.3 Non Harassment Orders (NHO)

An NHO is a court order which can be granted against the domestic abuse perpetrator, when they are behaving in a way that frightens the victim or causes them distress. It orders them not to commit certain actions (usually approaching or contacting the victim, which can involve physically or by email/phone/mail or social media).

There are two ways that a non-harassment order can be obtained:

- In a civil court; or
- Upon conviction in a criminal court.

Breach of an NHO is a criminal offence. In situations where we become aware of breach of an NHO, this will be reported to police immediately via 101 or 999 depending on the circumstances.

5.4 Children

The National Guidance for Child Protection in Scotland (2021) highlights domestic abuse as an indicator of risk with children and young people living with domestic abuse being at increased risk of significant harm: both as a result of witnessing abuse and being abused themselves. Children can also be affected by abuse even when they are not witnessing or being subjected to abuse themselves. Domestic abuse can profoundly disrupt a child's environment, undermining their stability and damaging their physical, mental, and emotional health.

In situations where we become aware of domestic abuse in a household, and children form part of that household composition, we will assess whether to report any concerns to Social Work / Police as appropriate in line with our Child Protection Policy. In these types of cases, frontline staff should speak directly to a member of the Group Protection Team for further support, advice, and guidance.

5.5 Adult Support and Protection

In some situations, those affected by domestic abuse may also meet what is commonly referred to as 'the three point test' to be deemed an adult at risk under the Adult Support and Protection (Scotland) Act 2007. An adult at risk of harm is any person aged 16 or over who:

- Is unable to safeguard their own wellbeing, property, rights or other interests;
- Is at risk of harm; and
- Because they are affected by disability, mental disorder, illness or physical or mental infirmity, are more vulnerable to being harmed than adults who are not so affected.

Where we have concerns an adult may be deemed an adult at risk we will assess whether to report our concerns to Social Work / Police Scotland as appropriate in line with our Adult Support and Protection Policy. Further advice, support and guidance can be obtained by contacting the Group Protection Team.

6. Designing and Delivering Services

Your Home, Your Community, Your Future demonstrates our continued focus on providing excellent homes, services, and products; and the benefits of coming together as Wheatley to learn from our joint experience and expertise to implement our shared learning. We will use Wheatley 360: our wraparound support division, to design and facilitate delivery of sector leading services. This will be achieved by working in partnership with key agencies to keep our communities safe.

Some of the ways in which we will do this are detailed below:

6.1 Group Protection Team

Within The Group we have a dedicated team – the Group Protection Team - who form part of our Wheatley 360 wraparound support division.

The Group Protection Team is focussed on driving forward the strategic outcomes contained in Your Home, Your Community, Your Future, through creating the best solutions and outcomes for all customers in relation to domestic abuse. In addition to the strategic focus, there is also an operational focus responding to the management of domestic abuse within our communities. This includes liaising with key partners in each of the local authority areas where we have a presence and attendance at various local Multi-Agency meetings.

6.2 Personalised Customer Service Outcomes

Our vision for 2021-2026, contained in Your Home, Your Community, Your Future, is to deliver outstanding personalised customer service – putting our customers in control of how they engage with us by offering a unique service mix. In order to deliver excellent services for our customers we need to understand who our customers are and what services they need and want. Through our appropriately differentiated range of engagement activities, we can design and deliver service outcomes for these customers.

By engaging with our customers to help them feel more in control of how and when they access support and improving access to information they need to make better decisions, we will improve their perception of value. We know that helping people feel more in control contributes to improving resilience, health, and wellbeing outcomes.

We will build staff skills around domestic abuse so that every interaction with a customer affected by domestic abuse should feel personal and should capture individual priorities for that customer as we know there is no such thing as a universal customer.

6.3 W.E. Care

Our unique W.E. Care model delivers a personalised service for all customers. The model focuses on maintaining and maximising wellbeing, safety and or self-reliance, by supporting people through life transitions, managing risks, and building lasting relationships.

We will draw down on this support as and when required to support our customers affected by domestic abuse

We know that flexibility, in any support model for those affected by domestic abuse is extremely important, as victims/survivors often seek help or try to leave on more than one occasion before finally ending the relationship. The inbuilt flexibility of our W.E. Care model allows us to recognise and respond effectively to the challenges people affected by domestic abuse face. Through our unique approach we will ensure self-reliance and control can be facilitated and maintained when it is right for the individual; safe in the knowledge that if they do stay or return to their partner that they can easily re-engage at any time.

Our specialist teams within Wheatley Care's Tenancy Support Service (a key component of our W.E. Care model) can play an important role in supporting customers affected by domestic abuse. The service is designed to provide short-term, low-level support to help customers who are vulnerable, at risk, or in crisis to develop the skills they need to make a success of their tenancy.

6.4 Use of Intelligence

Our ground breaking use of intelligence enables us to be alert to potential signs of domestic abuse within households. Intelligence can come from a number of sources; some of these are discussed in more detail below:

ASTRA (Our Group CRM)

The successful introduction of our ASTRA platform has transformed our service delivery and depth of customer insight. All information relating to customer contacts is held in one place (repairs, housing options, rent etc). The insight gained from ASTRA allows us to deliver real value to individual customers by targeting and tailoring services that are focussed on their particular needs. We are in a unique position as a landlord to be alert to abuse within households. This could, for example, be sudden unexplained rent arrears (potential indication of financial abuse), or customers requesting lock changes.

Business Intelligence Toolkit

We have worked with Police Scotland to develop a Wheatley specific Business Intelligence Toolkit (BIT). The BIT is designed to monitor emerging trends by tracking levels of specific crime types including domestic crimes and incidents from the preceding 24 weeks. The BIT also contains specific detailed data on date, time, and day of the week. The BIT intelligence is used by the Community Improvement Partnership (CIP), to provide a detailed picture of the nature and extent of domestic incidents (and other forms of violence and disorder) by Subsidiary and Area Housing Office (AHO). The data from the BIT is then used to influence and inform the future deployment and use of CIP resources and interventions.

Interventions may include:

- targeted days of action with Police colleagues in our Community Improvement Partnership; or
- Proactive offender management of repeat offenders in our communities.

Customer Conversations

Our staff are in regular contact with our customers for a variety of reasons, for example, our environmental operatives who operate a 24 hour a day / 365 days a year service in our multi storey sites, housing officers in customers' homes, our wraparound support services delivering services. All of these interactions can afford the opportunity to gather additional soft intelligence that could indicate a customer is affected by domestic abuse.

Multi-Agency Meetings/Forums

Housing is recognised as a key strategic partner within the Multi-Agency response to domestic abuse, and as such Wheatley Group; through the Group Protection Team, attend and/or engage with various forums across our stock footprint to share intelligence and information to support customers of domestic abuse.

6.5 Partnerships

We recognise that we cannot effectively support our customers and deliver preventative and early intervention services without strong partnership working at a local level. We work in partnership with a number of key agencies and participate in multi-agency forums, some of these are listed below:

- Violence Against Women Partnerships;
- Multi Agency Tasking and Co-ordinating Meetings (MATAC) actively targeting domestic abuse perpetrators;
- Multi Agency Risk Assessment Conferences (MARAC) to share relevant information and thereafter safety plan for high risk victims of domestic abuse;
- Disclosure Scheme for Domestic Abuse Scotland (DSDAS) Decision Making Forums. (see section 6.9);
- Domestic Abuse Investigation/Safeguarding Units;
- Domestic Abuse Specialist Services such as ASSIST and Women's Aid;
- SafeLives.

In addition to existing strategic partnerships, during the life of this policy we will develop new ones to further develop our response and assist us in supporting those affected by domestic abuse.

6.6 Housing Options and Solutions

Our housing options model is now embedded into our processes and is very much considered business as usual. During the life of this policy, we will work with colleagues to further develop staff knowledge of housing options, wraparound supports and pathways available for accessing specialist support to those affected by domestic abuse

For anyone who leaves an abusive relationship (whether victim or perpetrator) we will ensure their transition to their new home is as seamless as possible, supporting customers with all aspects of the move and beyond:

Finding a home:	Flexible approach in the application of our Information, Advice and Letting Policy Framework in order to provide priority and choice and recognise the negative impact domestic abuse has on our customers.
Moving into a new home:	Drawing down on wraparound supports such as Home Comforts; Benefits Advisors; Money Advice; Fuel Poverty Advisors; Wheatley Care Tenancy Support.
Creating and sustaining a new life:	Support to access employability programmes; referral to specialist support agencies; re-engagement with support at any time.

6.7 Home/Fire Safety

Evidence from research tells us that not all victims of domestic abuse want to leave their homes. Often simple security measures can make them feel safer and allow them to remain in their home with minimal disruption to them and their children.

We have created a bespoke service for our customers who are victims of domestic abuse – our Safe and Secure Service – which includes the provision of advice and guidance to allow customers to feel safer within their home, as well as the deployment of pioneering security products including smart doorbells, door/window alarms, door braces and personal safety alarms, to assist with tenancy sustainment.

Our joint venture with City Building and our in-house repairs service within Dunedin Canmore and DGHP provides an ideal platform to deliver this service offering, by providing the necessary expertise to install identified security measures.

Our in-house Fire Safety Officers can also support with securing our customers' homes, by providing expert advice in relation to fire safety within the home, alongside the provision of specialist products including fire retardant mailboxes.

6.8 Wheatley Foundation

Wheatley Foundation, The Groups Charitable Trust focuses on 2 main strategic aims supporting Wheatley households and families:

- maximising access to employment, training and learning opportunities for customers of all ages;
- supporting customers by tackling social exclusion and alleviating the impact of poverty.

The Foundation Team develop innovative solutions and creative ways to work with partners to support customers and communities. This includes providing families and households with a variety of opportunities and increasing access to services and support with employability, financial inclusion, digital skills, and community activities. This includes;

- Wheatley Works employability advice and support;
- Practical support to households through Eat Well, My Great Start, Home Comforts and Higher Education bursaries;
- Services for children and young people such as the Imagination library books for pre-school children; Youth Projects providing a range of services and activities for young people in the East; Click and Connect digital provision in local centres, and a range of local activities and community support.

6.9 Promotion of the Disclosure Scheme for Domestic Abuse Scotland (DSDAS)

The aim of DSDAS is to allow a partner in a relationship to ask about the background of their partner, if they are concerned that they have any history of abuse. DSDAS was rolled out across Scotland on 1st October 2015.

It also allows concerned members of the public, such as relatives, friends, or other agencies, to make enquiries about someone's partner if they are concerned that person has been abusive in the past. If a disclosure is deemed necessary, lawful, and proportionate, the person potentially at risk, or person best placed to safeguard that individual, will receive the information.

The scheme also creates a formal mechanism for Police Scotland to inform individuals who are potentially at risk of abuse from their partner, about that partner's past.

The scheme aims to enable potential victims to make an informed choice on whether to continue the relationship and provides further help and support to assist the potential victim when making that choice.

We actively promote this scheme amongst staff and customers and continue to participate in and/or contribute to DSDAS Multi-Agency meetings across our stock footprint. The person making the request is never sourced.

6.10 Domestic Abuse Training

Ensuring our staff are adept at spotting the signs of domestic abuse to ensure we are best placed to provide the appropriate support for our customers, is key to our response. We have established a strong strategic partnership with the National Domestic Abuse Charity SafeLives and together have created a bespoke training package for our staff to recognise and respond to domestic abuse, which is delivered collaboratively in partnership, allowing a unique oversight to be provided that is tailored to our service delivery.

7. How we will Know we are Making a Positive Impact on our Customers Lives and our Communities

We will know we are making a positive impact on our customers' lives and our communities when:

- Our communities are safer places for all, with our customers being confident in our response and feeling supported;
- Our staff are confident in dealing with all aspects of domestic abuse, being alert to signs of abuse;
- We have appropriate pathways and referral systems in place to ensure customers are getting the right support, at the right time, first time;
- We have a bespoke service offering pioneering security measures to allow our customers affected by domestic abuse to feel safer in their homes;
- Our customers affected by domestic abuse have real choice in the options available to them;
- We have a unique recording system to allow us to track our interventions when supporting customers affected by domestic abuse and the impact these have on our customers' lives; and
- We are realising the vision and outcomes contained within Your Home, Your Community, Your Future.

8. Legislation and Strategic Drivers

This policy has been developed considering the legislation and strategic drivers relevant to domestic abuse:

Legislation

- Matrimonial Homes (Family Protection) (Scotland) Act 1981
- Family Law (Scotland) Act 1985
- Protection from Harassment Act 1997
- Family Law (Scotland) Act 2006
- Protection from Abuse (Scotland) Act 2001
- Adult Support and Protection (Scotland) Act 2007;
- Criminal Justice and Licensing (Scotland) Act 2010
- Domestic Abuse (Scotland) Act 2011
- Abusive Behaviour and Sexual Harm (Scotland) Act 2016;
- Antisocial Behaviour etc (Scotland) Act 2004;
- Domestic Abuse (Scotland) Act 2018;
- General Data Protection Regulation (Regulation (EU) 2016/679);
- The Data Protection Act 2018;
- Housing (Scotland) Act 2001; and
- Housing (Scotland) Act 2014.

The Domestic Abuse (Protection) (Scotland) Act 2021 received Royal Assent on 5th May 2021, however, is not yet in force at this time. This new legislation will have a huge impact for Registered Social Landlords in further strengthening their response to domestic abuse.

Strategic Drivers

- Equally Safe, Scottish Government Strategy 2018. The Scottish Government in association with COSLA and other partners have agreed a commitment to preventing and eradicating violence against women and girls. This is contained within Equally Safe: Scotland's strategy for preventing and eradicating violence against women and girls. One form of violence against women and girls is domestic abuse. Equally safe does not exclude men but rather recognises that women and girls are disproportionately affected by particular forms of violence.

9. Policy Review & Consultation

We will review this policy every three years. Reviews will consider legislative, performance and good practice changes.

More regular reviews may be considered where, for example, there is a need to respond to new legislation / policy guidance or any recommendations from learning reviews.

We have developed this policy in consultation with stakeholders. Similar consultation will take place for all proposed policy reviews.

10. Support, Procedures, Awareness and Training

To enable us to protect the most vulnerable people in our communities, all staff will be made aware of the existence of this policy, their responsibilities, and the benefits of delivering this policy.

Training needs of staff across the organisation will be informed by insight from collaborative working between the Group Protection team and Wheatley Academy, based on information from the Groups skills analysis and employee performance review tool, My Appraisal.

Where skills gaps are identified, training by both external partners and key internal personnel will be provided for domestic abuse and wider Group Protection issues through our centres of excellence and online learning portals. The Group Protection Team will also host regular overview sessions, surgeries, or case discussions as/when required for teams when there are either identified issues, or on request; to continue to build resilience and confidence in this area for staff.

Regular blogs will be added to Wheatley Group Intranet Systems to ensure staff awareness levels are maintained and the Group Protection Matters Bulletins will be issued to all frontline teams, with information on Domestic Abuse featuring regularly

Staff will be supported by our Group Protection Team and supplied with clear written pathways, a quick reference guide and a detailed toolkit on how and where to report concerns.

Clear leadership and accountability mechanisms will be established, these will be complemented with robust governance arrangements.

11. Performance Monitoring and Reporting

The Group Protection Team have developed a Performance Monitoring Framework to capture information on Domestic Abuse cases across Group and routinely provide management information on all areas of importance and relevance pertaining to Domestic Abuse cases.

We use trend analysis from the Performance Monitoring Framework to inform our activity, future allocation of resources and identify training and support needs.

12. Confidentiality and Data Protection

Those employed or involved in our subsidiaries have a responsibility to act to make sure that a child, young person, or adult whose safety or welfare may be at risk is protected from harm.

In certain circumstances (and subject strictly to conditions set out in the Data Protection Act 2018, General Data Protection Regulations, and any other applicable data protection legislation) personal information may be shared by the Group with other organisations and partners. Before the Group can share personal information, it must consider all legal implications of doing so, not simply the terms of applicable legislative

requirements. Appendix 2 of Wheatley Group Data Protection Policy must be considered.

Once a decision has been made as to whether information should be shared, that decision must be recorded, together with the reasoning behind that decision. Where a decision was taken to share the information, this will be on a “need to know” basis and an audit trail must be kept.

Staff members must consult the Wheatley Group Data Protection Policy and if in doubt will seek advice from the Group Information Governance Team.

13. Engagement and Communication

Within the Wheatley Group we have Communities of Excellence (CoE) which consist of various members of staff from across the Group. Our CoE networks are at the heart of our Group wide ecosystem of innovation, generating learning ideas from across Group and learning from other sectors.

One of the key ways we will engage and communicate with staff in relation to this policy is through our network of CoE's. Through the CoE's, we will develop effective feedback loops between frontline staff and senior management. This will be the main channel for open and effective communication on the implementation of the Group Protecting People Policy Framework. Any blockages hindering the delivery of this policy framework will also be addressed through the CoE.

14. Complaints

Our aim is to get it right first time, however, where there is dissatisfaction with this policy or its operation, customers can make a complaint.

A summary of our Complaints Policy and Procedure is available on our Group and subsidiary websites.

Endnotes

- 1 Domestic Abuse recorded by the Police in Scotland, 2020-2021

<https://www.gov.scot/binaries/content/documents/govscot/publications/statistics/2021/11/domestic-abuse-recorded-police-scotland-2020-212/documents/domestic-abuse-recorded-police-scotland-2020-21/domestic-abuse-recorded-police-scotland-2020-21/govscot%3Adocument/domestic-abuse-recorded-police-scotland-2020-21.pdf>

- 2 Domestic Abuse reports under Domestic Abuse (Scotland) Act 2018 during 2020-2021

<https://www.gov.scot/binaries/content/documents/govscot/publications/statistics/2021/09/recorded-crime-scotland-2020-2021/documents/recorded-crime-scotland-2020-21/recorded-crime-scotland-2020-21/govscot%3Adocument/recorded-crime-scotland-2020-21.pdf?forceDownload=true>