

Bushbury Hill EMB Domestic Abuse Policy 2025

1. Policy Statement

BHEMB's Domestic Abuse Policy reflects the commitment of the organisation to work with partner agencies when responding to domestic abuse and aims to prevent and reduce the risk of harm to adults and children who are at risk.

2. Scope

BHEMB is committed to providing a robust and holistic approach to domestic abuse. This policy details our response and aims to ensure that those who are subjected to domestic abuse are supported in a way that is empowering, trauma-informed, choice-based, and customer-led. Taking its lead from the Tackling Interpersonal Violence and Abuse Including Violence Against Women and Girls, Wolverhampton's Multi-Agency Strategy 2019-2022, the policy seeks to:

- Work with partners to support victims and survivors of domestic abuse
- Incorporate new Domestic Abuse Legislation in the delivery of housing services
- Support victims and survivors to remain in their own homes, where safe to do so
- Utilise best practice guidance for housing professionals
- Empower and support people to make their own choices
- Share information in a timely way
- Safeguard adults and children using a risk-based approach

3. Statement of Intent

Safeguarding is everybody's business, with everyone playing a part in preventing, identifying, and reporting abuse. BHEMB, is committed to working collaboratively to improve the outcomes for adults and children who are experiencing domestic abuse. We are committed to:

- Ensuring all staff, paid or unpaid and working for or on behalf of BHEMB are familiar with policies and procedures relating to domestic abuse and safeguarding
- Providing training to all employees across the business in recognising domestic abuse, how to respond and how to report it

- Appropriately sharing information with statutory agencies and partner organisations about individuals who may be at risk from domestic abuse with due regard to confidentiality and information sharing protocols
- Meeting statutory safeguarding requirements in line with our existing policies and procedures where there are safeguarding concerns about a resident. In cases relating to children, staff will make referrals to Adult Social Care or Children’s Social Care at City of Wolverhampton Council

4. Policy Definitions

BHEMB recognises and acknowledges its legal duties and obligations under legislation relating to domestic abuse:

Domestic Abuse Act 2021 The Domestic Abuse Act 2021 has defined domestic abuse as: Behaviour of a person (“A”) towards another person (“B”) is “domestic abuse” if—

- A and B are each aged 16 or over and are personally connected to each other, and the behaviour is abusive.
- 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 (Economic abuse means any behaviour that has a substantial adverse effect on B’s ability to acquire, use or maintain money or other property, or obtain goods or services)
 - Psychological, emotional, or other abuse

It does not matter whether the behaviour consists of a single incident or a course of conduct. A’s behaviour may be behaviour “towards” B despite the fact that it consists of conduct directed at another person (for example, B’s child).

Types of Abuse Incidents of abuse may be one-off or a pattern of abuse and affect one or more individuals. Professionals and others should look beyond single incidents or individuals to identify patterns of abuse.

- **Physical abuse:** Includes 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.
- **Controlling Coercive Behaviour:** Refers to a pattern of controlling behaviours that create an unequal power dynamic in a relationship. These behaviours include isolation from friends/family, partner enforcing curfews and

monitoring whereabouts, monitoring of phone/internet use, control over what clothing the partner wears. These methods of control give the perpetrator power over their partner, making it difficult for them to leave.

- **Sexual Abuse:** Includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.
- **Image Based Abuse (Revenge Porn):** Distribution or threat of distribution of private images/videos without consent with the intention of causing embarrassment and distress.
- **Psychological, Emotional, or other abuse:** Involves the regular and deliberate use of a range of words and non-physical actions used with the purpose to manipulate, hurt, weaken, or frighten a person mentally and emotionally; and/or distort, confuse, or influence a person's thoughts and actions within their everyday lives, also known as gaslighting.
- **Economic abuse:** Includes restricting access to essential resources such as food, clothing, and transport. Creating a dependency by denying the means to improve a person's economic status – for example through education, employment, access to benefits or training.

The statutory definition clearly emphasises that domestic abuse is not solely physical violence, but can also be emotional, coercive, or controlling, and economic abuse. As part of the definition, children are explicitly recognised as victims if they see, hear, or otherwise experience the effects of abuse. A further range of measures and initiatives include targeted work with perpetrators and the introduction of Domestic Abuse Protection Notices.

BHEMB acknowledges that the Domestic Abuse Act 2021 places duties on us as a housing organisation. Under Part 7 of the Housing Act 1996 (homelessness: England) the act will give those who are homeless because of domestic abuse, priority need for accommodation.

Whilst aiming to increase the safety of victims, in the event temporary accommodation is needed but available within Wolverhampton, there may be occasions whereby victims and their immediate family members will be offered a form of temporary accommodation outside of the city.

We aim to ensure victims and survivors do not remain with their abuser for fear of losing their home. Under Part 4 of the Housing Act 1985, where an individual has left a secure tenure due to domestic abuse, legislation outlines that the individual should be offered a new secure tenancy.

5. Roles and Responsibilities

Any individual, agency, or employee who wishes to report domestic abuse or has concerns about an individual can contact the BHEMB Tenancy Team

We will enable residents and employees to report domestic abuse to BHEMB in a variety of ways and will respond to all reports of domestic abuse that we receive, including those made in confidence and those made by individuals not directly involved, such as partner agencies, neighbours, and contractors. We will work with partner agencies to support victims and survivors of domestic abuse and, where appropriate, also work with perpetrators where we can do so without compromising the safety of individuals affected by domestic abuse.

We will arrange a safe time, place, or communication method which is convenient for victims and survivors of domestic abuse. We will establish if there are any special requirements that should be considered, for example, the need for a language interpreter or BSL interpreter. We will, with consent, share information between agencies where the assessment against the DASH Risk Identification checklist meets the local authority threshold for MARAC referrals. The information will be shared with those agencies attending the meeting or with expressed consent of the MARAC Chair.

BHEMB is committed to supporting people to safely remain in their homes. Our Tenancy Team will provide advice and support which aims to improve security and safety via our target hardening measures. Where appropriate we may also refer to the Wolverhampton Homes Sanctuary Scheme. We will offer target hardening provision to all those where the security of the home is compromised due to domestic abuse. In cases where a financial need is identified, we will make a referral to Wolverhampton Homes Money Smart Team or other agencies such as Step Change and Citizens Advice Bureau. We will work in partnership through the Wolverhampton Homes Housing IDVA (Independent Domestic Violence Advisor) and the CWC Homeless Team to assess and support individuals who present as homeless due to domestic abuse.

BHEMB does not tolerate any form of domestic abuse and will investigate, consider all legal remedies, and take appropriate action against any tenant or employee who perpetrates domestic abuse. We will ensure any action taken does not compromise the safety of an individual or their family. We will signpost victims and survivors of domestic abuse to relevant organisations who provide legal advice and well-being services. Support can also be accessed from the following organisations:

Contact information correct as of July 2025

- Police - in an emergency 999, non-emergency 101
- Black Country Women's Aid: 0121 553 0090
- National LGBT+ Domestic abuse helpline: 0800 999 5428

- The Haven Wolverhampton - 24-hour referral line: 08000 194 400 or for webchat Haven Refuge
- National Domestic Violence Helpline 24 hours: 0808 2000247
- Karma Nirvana: 0800 5999 247 / Mon-Fri 9am-5pm – supporting victims of so-called honour-based violence
- RESPECT victims (men's advice line and enquiries): 0808 801 0327
- RESPECT perpetrators (men who are in danger of being violent or abusive): 0808 802 4040
- Civil Legal Advice: 0845 345 4345
- National Centre for Domestic Violence NCDV – 0800 970 2070 or text: NCDV to 60777 – provide support with obtaining injunctions

Training

Safeguarding Training is mandatory for all employees across the business. BHEMB provides training on domestic abuse and will focus attention on:

- Identification of domestic abuse, the duty of care and what it means in practice
- Recognising and how to report domestic abuse
- The rules around confidentiality and information-sharing
- How we must work with other agencies to increase safety for victims and survivors of domestic abuse and their families
- The roles of staff, managers, and leaders within the company in raising awareness of domestic abuse in Wolverhampton

Reporting and Dealing with Allegations of Abuse against Employees of BHEMB

BHEMB is committed to responding appropriately to concerns about anyone who works for, or on behalf of, BHEMB in any capacity in relation to their behaviour and conduct towards others (in any setting, not just in the workplace). If concerns are raised, BHEMB will deal with the matter internally using existing BHEMB HR policy and practice which will not be confused with any statutory investigations which may be required and carried out by Social Care and the Police.

All employees have the right to be supported in the workplace and no assumptions of guilt will be made, however, BHEMB will take appropriate action, via its discipline/grievance resolution procedures against any employee who victimises, intimidates, or harasses a fellow staff member, customer or partner experiencing domestic abuse and/or uses BHEMB time and resources to do so. If any employee is accused/convicted of a criminal offence that could have an adverse impact on the company, other employees or poses a risk, BHEMB will undertake an investigation under the disciplinary procedure and a risk assessment will be undertaken. All

matters will be dealt with sensitively and confidentially. Following an investigation, allegations of this type may be considered as gross misconduct and, if proven, could lead to dismissal. In such cases, BHEMB will work alongside specialist services to manage the risk to all parties and signpost as required for further support.

BHEMB will, always, seek the advice and assistance of the Local Authority Designated Officer (LADO) in managing any such case.

6. Monitoring

Good record-keeping is an essential part of the accountability of organisations to those who use their services. Maintaining proper records is vital to an individual's care and safety. If records are inaccurate, future decisions may be wrong and harm may be caused to the individual. Where an allegation of abuse is made all agencies have a responsibility to keep clear and accurate records. It is fundamental to ensure that evidence is protected and to show what action has been taken and what decisions have been made and why. It is equally important to record when actions have not been taken and why e.g., an adult with care and support needs with mental capacity may choose to make decisions professionals consider to be unwise.

7. Interdependencies and Related Policy

Information sharing. Sharing information at the right time, with the right people, is fundamental to good practice in domestic abuse and adult and children's safeguarding. The Mental Capacity Act is also relevant as all those meeting adults with care and support needs should be able to assess whether someone has the mental capacity to make a decision concerning risk, safety or sharing information. The law does not prevent the sharing of sensitive, personal information within organisations. If the information is confidential, but there is a safeguarding concern, sharing it may be justified. In addition, the law does not prevent the sharing of sensitive, personal information between organisations where the public interest served outweighs the public interest served by protecting confidentiality – for example, where a serious crime may be prevented. BHEMB will appropriately share information with statutory agencies and partner organisations on a need-to-know basis about individuals who may be at risk from domestic abuse with due regard to confidentiality and information sharing protocols.

BHEMB understands that occasionally situations arise when workers within one agency feel that the actions, inaction, or decisions of another agency do not adequately safeguard a child or an adult with care and support needs. Should this be the case, BHEMB will ensure such situations are addressed by following the Wolverhampton Safeguarding Together, Safeguarding Escalation Policy.

BHEMB has in place a range of policies and procedures which outline how the company will respond to safeguarding specifically and the care and wellbeing of its employees. The relevant procedures/policies are:

- Disciplinary Policy and Procedure
- Wolverhampton Allocations Policy
- ASB Policy
- Domestic Violence and Abuse Policy
- Whistleblowing Policy & Procedure
- General Data Protection Regulations (2018)
- Wolverhampton Adult safeguarding policy
- Wolverhampton Safeguarding Adults Procedure
- Wolverhampton Safeguarding Children & Young People Procedure
- Wolverhampton Children & Young People Safeguarding Policy

Legal Framework

This policy is also informed by the legal and regulatory framework for responding to domestic abuse, including:

- Housing Act 1996
- The Equality Act 2010
- The Children Act 1989
- Family Law Act 1996
- Protection from Harassment Act 1997
- Data Protection Act 2018
- Crime & Disorder Act 1998 S.17
- Mental Capacity Act 2005
- Freedom of Information Act 2000
- Homelessness Act 2002 / Homeless Reduction Act 2017
- Anti-Social Behaviour Act 2003
- Domestic Violence, Crime and Victims Act 2004
- Civil Partnership Act 2004
- Localism Act 2011
- Protection of Freedoms Act 2012
- Anti-Social Behaviour, Crime and Policing Act 2014

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- Serious Crime Act 2015

8. Associated Procedures

- **MARAC (Multi Agency Risk Assessment Conference):** A regular local meeting to discuss how to help people at high risk of murder or serious harm. This includes a domestic abuse specialist (Independent Domestic Violence Advisor - IDVA), police, children's social services, health, and other relevant agencies.

For cases which meet the threshold of MARAC, or if we have safeguarding concerns, BHEMB have a legal duty to share information with relevant agencies, such as Social Care via an EMARF or SA1 as detailed and found on the Safeguarding Wolverhampton Together website.

We will arrange, with the agreement of the individual affected by domestic abuse, professionals' meetings to ensure support is received from all relevant agencies where the DASH Risk Identification Checklist does not meet the local authority threshold for a MARAC referral.

Domestic homicide reviews (DHR): Consider the circumstances that led to the death of a victim that is intrinsically linked to Domestic Abuse. The review will identify where responses to the situation could have been improved. In so doing, the lessons learned will be taken on board by the professionals and agencies involved (i.e., the police, social care, Local Authority, housing providers, and other community-based organisations).

9. Target Hardening

This is a Bushbury Hill EMB specific scheme, the Board have set an annual budget to support this work.

In order to help people experiencing domestic abuse to stay in their homes, BHEMB will offer a range of practical security measures to tenants, installed free of charge. Officers will work with the tenant to determine which measures are needed

Measures will be offered as a result of referrals from other agencies or at the discretion of the Tenancy Officer managing the case and signed off by a manager.

This will include:

- prickles strips for fences/gates
- door bell cameras
- additional security lights
- window alarms
- fire bags for the letter box

10. Equality and Diversity

We recognise that:

- All adults and children have a right to equal protection from domestic abuse, regardless of age, disability, race, religion or belief, sex, gender identity or gender expression, sexual orientation, marriage or civil partnership, pregnancy or maternity or any other equality characteristic.
- Some adults are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues.
- Working in partnership with other agencies is essential in promoting the welfare of vulnerable adults and children.
- It is essential we identify relevant training needs for staff and anyone working on behalf of BHEMB either paid or unpaid to make them safeguarding aware.

An Equality Impact Assessment has been completed for this policy.

Service/Project/Policy	Department	Assessor	New/Existing	Date
Nuisance behaviour Policy	Tenancy	BHEMB Board	New	August 2025
<p>1. Who is responsible for the service/project/policy?</p> <p>Karen Williams, Chief Officer and Bill Heywood, Tenancy Manager</p>				
<p>2. Describe the purpose of the service/project/policy? Who is it intended to benefit? What are the intended outcomes?</p> <p>Through this policy we aim to provide clear lines of responsibility within BHEMB for the support of victims of domestic abuse. To provide The City of Wolverhampton Council (CWC) who will report to The Regulator of Social Housing Bushbury Hill Estate Management Board's approach to managing reports of domestic abuse within properties detailed in our Modular Management Agreement.</p> <p>The intended outcomes are;</p> <ul style="list-style-type: none"> - Work with other agencies to reduce the risk of harm to adults and children who are at risk of domestic abuse - A clearer policy and guidance for staff to operate with - To offer support to victims of domestic abuse living in properties managed by BHMEB - A clearer policy and guidance for staff to operate with 				
<p>3. Are there any associated objectives?</p> <ul style="list-style-type: none"> - To offer early intervention when issues arise 				

- Refer victims and perpetrators of domestic abuse to appropriate support agencies
- Joint working with other agencies
- Providing information and guidance to tenants

4. What factors contribute or detract from achieving the intended outcomes?

The EMB may experience issues when applying this policy where victim or perpetrator or both refuses to engage with their tenancy officer. Failure to accept offers of support or advice from other agencies can also make it difficult to achieve success.

5. Does the service/project/policy have an impact in terms of race, disability, gender, gender reassignment, religion or belief, sexual orientation, and age?

This policy has been developed with the intention that it ensures equality of treatment for all tenants without discrimination, or victimisation and is not intended to inadvertently affect any person covered under the protected characteristics as defined in the Equality Act 2010.

Board Decision	Approve	
Comments		