

## Dolphin Square Charitable Foundation & Dolphin Housing Limited

### DOMESTIC ABUSE POLICY & PROCEDURE

Review Date: September 2025

Approved: Customer Service Director

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Version: 1

#### Contents

1. Introduction.....	
2. Relevant Legislation and Standards.....	
3. Policy objectives.....	
4. Definitions.....	
5. Background.....	
6. Indications and signs of Domestic Abuse.....	
7. Our Approach.....	
8. Responsibilities under this Policy.....	
9. Risk Management.....	
10. Data Protection, Record Storage and Retention.....	
11. Equality and Diversity.....	
12. Monitoring and Review.....	
Appendix 1 – Signposting	
Appendix 2 – DA reporting form	

## 1. Introduction

Dolphin Living is committed to maintaining safe communities, and we recognise the effect that domestic abuse has on the quality of life of our residents and communities.

Domestic Abuse (DA) is a prevalent issue in society, and as a landlord we have a significant part to play in identifying and responding to cases of abuse in a considered and helpful way.

We recognise that the safety of our residents, their families and our colleagues is paramount, and we will do all we can to protect them and provide suitable advice, support and signposting.

This document sets out how Dolphin Living will recognise, respond, record and refer appropriately where we identify domestic abuse.

## 2. Relevant Legislation and Standards

<b>Relevant Standards</b>	This Policy aligns to the Regulators Consumer Standards: <ul style="list-style-type: none"> <li>• Tenancy Standard</li> <li>• Neighbourhood and Community Standard</li> </ul>
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<b>Relevant Legislation</b>	Domestic Abuse Act 2021 Domestic Violence Disclosure Scheme (Clare's Law) Data Protection Act 2018 Modern Slavery Act 2015 Serious Crime Act 2015 Anti-Social Behaviour Crime & Policing 2014 Protection of Freedoms Act 2014 Equality Act 2010 Police and Justice Act 2016 Domestic Violence Crime and Victim Act 2004 (S9 implemented in 2011) Sexual Offences Act 2003 Human Rights Act 1998 Protection from Harassment Act 1997 Housing Act 1996
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## 3. Policy Objectives

Perpetrators of domestic abuse can have a devastating impact on the lives of their victims, and their actions can result in injury, trauma and potentially death.

The policy applies to anyone living in our properties or receiving a service from us.

This policy sets out how Dolphin Living will respond to anyone suffering from domestic abuse and the key principles that underpin our response. The policy also sets out how we will hold perpetrators to account.

It recognises the need to share information and work in partnership with other agencies with greater experience of domestic abuse in order to reduce the risk of harm to survivors.

Our aim is to support survivors of domestic abuse by

- Speaking to the resident and taking account of any safety concerns around Communication
- Listening and believing their account
- Working with them to assess risk and agree an appropriate action plan.

We will work with relevant external agencies, share information appropriately and in line with GDPR and our data sharing protocols.

We will work with survivors ensuring we stay focused on their individual needs and the needs of their family/ household.

This document should be used by employees, contractors and our Managing Agent Touchstone to understand how Dolphin Living should respond to disclosures or incidents of domestic abuse relating to those living in our properties.

#### 4. Definitions

The UK government's definition of Domestic Abuse (DA) is "any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality".

Domestic abuse is not always physical violence. It can also include:

- coercive control and 'gaslighting'
- economic abuse
- online abuse
- threats and intimidation
- harassment and stalking
- emotional abuse
- sexual abuse

Anyone can experience domestic abuse, regardless of gender, age, ethnicity, religion, socio-economic status, sexuality or background.

It is possible for domestic abuse to be perpetrated by women towards men. However, there is evidence to show that it is mainly abuse by men against women. Women are statistically more likely to be injured, repeatedly abused, and murdered. Male perpetrators are also far more likely than women to abuse their ex-partner following a separation.

The term 'violence against women and girls' refers to acts of violence or abuse that we know disproportionately affect women and girls. Crimes and behaviour covered by this term

include rape and other sexual offences, domestic abuse, stalking, 'honour'-based abuse, as well as many others, including offences committed online.

The terms "Victim" and "Survivor" are used to describe those who have lived experience of domestic abuse. Survivor refers to those who are in recovery from DA, and Victim usually refers to someone who is currently still experiencing it. Some people do not want to be referred to as a victim, so ultimately, it is imperative to follow the lead of the person seeking support, since the journey from victim to survivor is unique to each person.

## **Children**

The Domestic Abuse Act 2021 recognises children as victims/survivors of domestic abuse.

Any reference in the Act to a victim of domestic abuse includes a reference to a child who (a) sees or hears, or experiences the effects of, the abuse, and (b) is related to either of the parties.

Children living in households where domestic abuse occurs are recognised as victims of that abuse in their own right and our approach reflects this. The safety of all survivors is our priority, and we will inform statutory services where we believe that a child is harmed or at risk due to domestic violence.

We will also make appropriate safeguarding referrals in respect of any vulnerable adult who may also be impacted by the abuse.

## **5. Background**

It is important to recognise the severity of domestic abuse to identify it and respond appropriately.

The below statistics give context to the issue and demonstrates the need for this reference guide to inform our work.

- Domestic abuse is experienced by over 2.3 million people in England and Wales every year
- The police answer a DA call every 30 seconds
- 1 in 7 children have experience DA at some point in their childhood
- 2 women are murdered every week due to DA
- 75% of women victims are killed in their own home
- 1 in 5 women have experienced some form of sexual violence since the age of 16
- Victims try to reach out 5 times on average before they get an appropriate response
- A resident does not need to be living with the partner or family member to be a victim of abuse
- Post-separation abuse is the most common form of DA

Housing is a huge barrier for people leaving a DA relationship.

It is crucial that Dolphin Living and Touchstone staff are aware of the direct and indirect ways that DA presents in a Housing setting specifically. We encourage staff to work with the ethos that every interaction is an opportunity for intervention.

## 6. Indications and Signs of Domestic Abuse

All members of frontline staff at Dolphin Living and Touchstone must be aware of the signs of DA. Potential abuse should be at the forefront of our minds to ensure that it is dealt with confidently and sensitively. We ask staff to be aware of their surroundings, and to make the time to stop and think about the situation, rather than being process-driven or solely focussed on the initial reason for the visit.

Signs of DA include, but are not limited to:

- Repeat repairs e.g. doors and/or windows repeatedly breaking, holes in walls
- Refusing access for repairs / staff visits
- ASB complaints made against them e.g. arguing, loud music
- Resident phoning up more often, possibly just to chat
- Rent payments stop and/or change in benefits payments
- Physical marks e.g. bruises, or presenting as nervous, timid
- Covering up e.g. long sleeves even in hot weather
- Appearing to be timid/afraid of partner when physically present or talking about them
- Body language and behaviour around partner e.g. not speaking when they are there, not appearing to be an equal partner
- Repeated pregnancies in quick succession

If you are unsure of what these signs may indicate, please speak to the Customer Services Team.

DA can be mistaken as Anti-Social Behaviour (ASB), and victims are 4 times more likely than the general resident population to receive ASB complaints. For example, neighbours may make noise complaints that could be the result of verbal assaults from the perpetrator, victims calling out for help, or even the crashes and bangs of physical violence, including punching walls, slamming doors, kicking or throwing objects or physically assaulting adult or child victims. Loud music may be played to cover up the sounds of abuse.

We know that one of the most prevalent signs of DA is repairs. Touchstone ensure that their contractors are aware of the signs, and the annual property inspections are required to document any suspected signs or issues.

Statistically, victims of DA are more likely to receive eviction notices due to rent arrears, which can often be the result of economic abuse from the perpetrator.

We appreciate that it can be challenging to discern what is a sign of abuse, especially considering the different cultures and relationship dynamics that exist amongst our residents. Whilst we cannot be 100% sure of the situation just from observing these signs, we must be diligent in disclosing anything we think may be of relevance to a DA case.

Intervention requires a collaborative approach from all parties involved, so anything you suspect must be documented immediately. Over time, you may build a picture which leads to service intervention e.g. social services. However, if you believe that there is an urgent need for immediate help, please do not hesitate to contact the relevant services.

## 7. Our Approach

It is vital that all suspected DA cases are recorded by Touchstone and Dolphin Living staff. If they suspect DA following a phone call or visit with a resident, they are expected to follow the below steps:

- Staff are to advise their manager about what they have witnessed/experienced and their concerns.
- We encourage residents to report DA, whether they are survivors of, or have witnessed such incidents.
- For any resident reporting DA, we will make contact within one working day.
- We will complete a DA reporting form with our resident- (see below Appendix 2)
- We will support our residents to empower them to make their own decisions about what they would like to happen next, so they can make informed choices.
- With cooperation of the resident, we will carry out a risk assessment with them. This helps us to understand their situation.
- All reports will be logged on the shared tracker “ASB, Safeguarding, Complaints” under Suspected DAV tab. The Flat number instead of resident’s name is to be recorded for ongoing confidentiality.
- Staff are to make comprehensive notes of everything they have observed or been told by the victim, no matter how small. Everything helps to build a bigger picture about what is taking place.
- Once the Dolphin Living Customer Service Team have been made aware of a suspected case, they will formulate an action plan.
- If staff believe the resident is in immediate danger, they are to contact the local police station and relevant DA service (see below Appx 1)
- Staff are not expected to attempt to engage with the perpetrator. However, if they disclose their behaviour, they should contact relevant DA service (see below Appx 1)
- Domestic Abuse is a breach of the tenancy agreement. However, the action taken against perpetrators will depend upon the individual circumstances and supporting evidence which our partner agencies provide. Wherever possible, we will take action against convicted perpetrators, in line with our tenancy agreement, where it is safe and appropriate to do so.
- A decision to close a case should always be discussed, and ideally agreed, with the survivor before clearly explaining the reasons.

We will provide clear guidance and training for all relevant staff on being alert to the signs of DA, how to report concerns and disclosures and how relevant staff manage cases of domestic abuse.

## 8. Responsibilities under this Policy

Relevant staff are responsible for implementing this policy and being vigilant in identifying any incidents that may fall under it. Incidents should be discussed with Customer Services Team who should refer to this policy and procedure and any other relevant guidance.

If any member of staff has any concerns about the safety or wellbeing of a child and/or adult at risk, they must immediately follow the Dolphin Living Safeguarding Policy & Procedure.

Staff safety and wellbeing is of the utmost importance. Staff dealing with DA cases must take the time to acknowledge their own thoughts and feelings, and the impact that this type of work can have on their mental health.

Line Managers will always make themselves available to discuss safeguarding issues at any time.

Staff will be expected to refer residents to specialist agencies for support. See Appx 1

Staff should access the following DA resources for guidance and support as required:

[DAHA Early Intervention for Neighbourhood and Community Housing Teams](#)

[DAHA Domestic Abuse Guidance for Private Landlords](#)

Women's Aid offer advice and support for professionals - <https://www.womensaid.org.uk/what-we-do/i-work-with-survivors/dedicated-service-for-professionals/>

Mind Mental Health offer resources to support mental health in the workplace - <https://www.mind.org.uk/workplace/mental-health-at-work/>

Staff are able to access Dolphin Living private healthcare wellness plan for employees.

## 9. Risk Management

Responding appropriately to DA is a key responsibility for housing, care and support providers. We understand the risks posed to customers due to domestic abuse and Dolphin Living will seek to mitigate risk through this policy. When responding to any incident, we take a risk-based view to the actions being taken to ensure that the most appropriate action is taken, and the welfare and safety of residents and staff are at the forefront. This is also reflected in any Safeguarding risk which is identified.

## 10. Data Protection, Record Storage and Retention

It is recognised that incidents of DA are extremely sensitive, private incidents for survivors to report and Dolphin Living shall maintain the confidentiality of a disclosure regarding violence to the extent allowed by the law and unless to do so would result in significant risk of harm to any persons on any case that that are reported.

Dolphin Living will however, share relevant information with local agencies such as the Police, MARAC and other groups where necessary, to deal with cases more effectively by either gathering extra evidence to carry out enforcement measures against the perpetrator or sharing information in the interests of the survivor and/or their dependants to provide better of more effective support.

The principles of UK GDPR and Dolphin Living's Data Protection Policy will apply to this Policy.

## 11. Equality and Diversity

The policy complies with the requirements of the Equality Act 2010 to ensure equality of treatment for all residents without discrimination or prejudice.

Domestic Abuse can be experienced by anyone, including those with protected characteristics and males.

Issues around diversity have been considered around access to and delivery of any services covered by the Policy.

On request, Dolphin will provide translations of its policies and procedures in requested languages and other accessible formats.

## 12. Monitoring and Review

Dolphin will monitor, analyse and report on DA to ensure the process is delivered effectively and that timescales are achieved.

We will use the learning from formal complaints and customer feedback as part of a programme of service improvement reviews.



## Appendix 1 Signposting

National Organisation's	Website	Contact number
NHS UK	<a href="https://www.nhs.uk/live-well/getting-help-for-domestic-violence/">https://www.nhs.uk/live-well/getting-help-for-domestic-violence/</a>	
National Domestic Abuse Helpline	<a href="http://www.nationaldahelpline.org.uk/">www.nationaldahelpline.org.uk/</a>	0808 2000 247
Women's Aid	<a href="https://www.womensaid.org.uk/information-support/">https://www.womensaid.org.uk/information-support/</a>	
Solace – for women and children in London	<a href="https://www.solacewomensaid.org/">https://www.solacewomensaid.org/</a>	0808 802 5565
Refuge – for women and children	<a href="https://refuge.org.uk/i-need-help-now/how-we-can-help-you/national-domestic-abuse-helpline/">https://refuge.org.uk/i-need-help-now/how-we-can-help-you/national-domestic-abuse-helpline/</a>	
Paladin – for victims of stalkers	<a href="https://www.paladinservice.co.uk/">https://www.paladinservice.co.uk/</a>	
Surviving Economic Abuse – for economic abuse specifically	<a href="https://survivingeconomicabuse.org/">https://survivingeconomicabuse.org/</a>	
Latin American Women's Rights – for Latin American women, Spanish and Portuguese speaking	<a href="https://lawrs.org.uk/contact/">https://lawrs.org.uk/contact/</a>	
Imkaan – for Black and minoritised women	<a href="https://www.imkaan.org.uk/">https://www.imkaan.org.uk/</a>	
<b>Organisations for Male</b>		
Mankind Initiative	<a href="https://mankind.org.uk/">https://mankind.org.uk/</a>	01823 334244
Men's Advice Line	<a href="https://mensadvice.org.uk/">https://mensadvice.org.uk/</a>	0808 8010327
Respect - for male perpetrators	<a href="https://www.respect.uk.net/pages/42-work-with-perpetrators">https://www.respect.uk.net/pages/42-work-with-perpetrators</a>	
<b>Organisations for LGBTQ</b>		
National LGBT+ Domestic Abuse Helpline		0800 999 5428
Galop – LGBTQ+ anti-abuse charity	<a href="https://galop.org.uk/">https://galop.org.uk/</a>	
Stonewall Housing	<a href="https://stonewallhousing.org/">https://stonewallhousing.org/</a>	
<b>Boroughwide Organisations &amp; Named Blocks in borough</b>		
<b>Westminster</b> (Broadway, Dibdin House, Hopkins St, Lanark Road, Lanhill Road, One Church Square, Porchester Road, Thorney St, Wardour St)		
Westminster Council resources	<a href="https://www.westminster.gov.uk/domestic-violence-against-women-and-girls/get-help">https://www.westminster.gov.uk/domestic-violence-against-women-and-girls/get-help</a>	
Angelou Partnership for women and girls in West and Central London	<a href="https://www.angelou.org/">https://www.angelou.org/</a> -	0808 801 0660 0208 7417008
Woman's Trust – free counselling and advice for victims	<a href="https://womanstrust.org.uk/">https://womanstrust.org.uk/</a>	
Advance – tri-borough DA service	<a href="https://www.advancecharity.org.uk/get-help/">https://www.advancecharity.org.uk/get-help/</a> <a href="mailto:angelou@advancecharity.org.uk">angelou@advancecharity.org.uk</a>	0800 059 0108
<b>Camden</b> (Wollstonecraft St)		
Camden Council resources	<a href="https://www.camden.gov.uk/domestic-violence#hynn">https://www.camden.gov.uk/domestic-violence#hynn</a> and	

	<a href="https://www.camden.gov.uk/contact-domestic-violence-support-organisations">https://www.camden.gov.uk/contact-domestic-violence-support-organisations</a>	
<b>Ealing</b> (Grove Court, Mount Close)		
Ealing Council resources	<a href="https://www.ealing.gov.uk/info/201058/domestic_violence_and_abuse_what_help_can_i_access">https://www.ealing.gov.uk/info/201058/domestic_violence_and_abuse_what_help_can_i_access</a>	
Southall Black Sisters – for Black women and girls, based in Ealing	<a href="https://southallblacksisters.org.uk/get-help/">https://southallblacksisters.org.uk/get-help/</a>	
<b>Hackney</b> (New Era, Kingsland Road)		
Hackney Council resources	<a href="https://hackney.gov.uk/domestic-abuse-support">https://hackney.gov.uk/domestic-abuse-support</a>	
Woman's Trust – free counselling and advice for victims	<a href="https://womanstrust.org.uk/">https://womanstrust.org.uk/</a>	
Sistah Space - for African and Caribbean heritage women, based in Hackney	<a href="https://www.sistahspace.org/">https://www.sistahspace.org/</a>	
<b>Hammersmith and Fulham</b> (Gorleston St)		
Hammersmith and Fulham Council resources	<a href="https://www.lbhf.gov.uk/crime/violence-against-women-and-girls-vawg">https://www.lbhf.gov.uk/crime/violence-against-women-and-girls-vawg</a>	
Angelou Partnership for women and girls in West and Central London	<a href="https://www.angelou.org/">https://www.angelou.org/</a> -	0808 801 0660 0208 7417008
Advance – tri-borough DA service	<a href="https://www.advancecharity.org.uk/get-help/angelou@advancecharity.org.uk">https://www.advancecharity.org.uk/get-help/angelou@advancecharity.org.uk</a>	0800 059 0108
<b>Lambeth</b> (Kennington Lane and Holyoak)		
Lambeth Council resources	<a href="https://www.lambeth.gov.uk/community-safety-anti-social-behaviour/violence-against-women-girls-vawg/get-help-keep-safe">https://www.lambeth.gov.uk/community-safety-anti-social-behaviour/violence-against-women-girls-vawg/get-help-keep-safe</a>	
<b>Lewisham</b> (Havelock and Hermitage)		
Lewisham Council resources	<a href="https://lewisham.gov.uk/inmyarea/publicsafety/violence-against-women-and-girls/support-for-people-experiencing-gender-based-violence--athena-service">https://lewisham.gov.uk/inmyarea/publicsafety/violence-against-women-and-girls/support-for-people-experiencing-gender-based-violence--athena-service</a>	
<b>Waltham Forest</b> (Butterfields and Shernhall)		
Waltham Forest Council resources	<a href="https://www.walthamforest.gov.uk/neighbourhoods/crime-and-community-safety/community-safety/domestic-abuse/domestic-abuse-support-services">https://www.walthamforest.gov.uk/neighbourhoods/crime-and-community-safety/community-safety/domestic-abuse/domestic-abuse-support-services</a>	

## Appendix 2 Reporting form

### Domestic Abuse Report Form

#### PERSON REPORTING INCIDENT

Date:	
Name & Address of reporter:	
Telephone:	Email:
Preferred method of contact:	
Name & Address of alleged perpetrator/s:	
Type of Abuse (If known)	Controlling/coercive behaviour
	Emotional/Psychological abuse
	Financial/economic abuse
	Forced marriage
	Harassment
	Honour-based violence
	Online/technical abuse
	Physical Abuse
	Sexual Abuse
	Stalking
	Anything else (please specify)

#### Further information

Details of anyone else involved (neighbours, Police, Social Services, Supporting agencies)

Details of assistance required or advice provided (re current tenancy, moving, change in tenancy Joint to sole etc)

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Name of person completing form:	
Signature:	
Date	

**Dolphin staff will respect confidentiality and will not share any information given in confidence unless justified by the assessed risk to the vulnerable person or required by law- for example, adult or child safeguarding concerns, or where Dolphin are required as part of a criminal investigation by the Police.**

**We will always treat any sensitive or personal information given to us as confidential in accordance with the Data Protection Act 1998 and the UK GDPR 2018.**

**I confirm that I understand the above.**

Name of reporter:	
Signature:	
Date:	

Date completed form sent to Safeguarding Lead:	
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Review of case & any agreed follow-up action/s
Date:

Outcome

Date Case closed: