CROYDON COUNCIL HOUSING

Domestic Abuse Policy



This policy was reviewed with the help of Croydon Housing Residents

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1. Purpose

1.1 **Prevent domestic abuse** - while housing services will often interact with survivors at crisis point, we will aim to prevent domestic abuse by taking a zero-tolerance approach to abuse and by focusing on early intervention and preventing re-victimisation.

1.2 **Support victims and survivors** – Housing services that work with victims and survivors of domestic abuse will provide appropriate support, maintain a strong awareness of the options and services available, and work collaboratively with specialist domestic abuse organisations to ensure coordinated and effective assistance. This include specialist organisations within the domestic abuse, sexual violence and community care sectors that are run, led and governed by the specific minoritised or marginalised communities they serve. These services providing culturally competent, accessible and trusted support that reflects the lived experiences, needs and barriers faced by minoritised and marginalised groups.

1.3 **Hold perpetrators to account** - we will try to take proactive action against perpetrators, where possible depending on the needs or wishes of the survivor, to reduce the disruption that domestic abuse causes to the survivor's life, and ensure that perpetrators access support they need, including for behaviour change.

1.4 **Collaborate to create change** - we will continue to build on our existing partnerships with domestic abuse and community-led services, create opportunities to work with survivors to review how our response is working and how it could be improved, and will play an active role in multi-agency safeguarding forums.

1.5 **The Croydon Housing Domestic Abuse Policy aligns with the four priorities in the** Tackling violence against women & girls plan 2024-2027

- Strengthening prevention and earlier intervention
- Pursue perpetrators
- Supporting and protecting Victim/Survivors and their families
- Partnership working and enhancing our coordinated community response to Domestic Abuse

2. Statement of Intent

2.1 This Domestic Abuse policy seeks to reduce risk to victim/survivors of abuse. It has been developed with a survivor-centred approach. We are grateful for the support of the Family Justice Service, the Croydon BAME Violence Against Women and Girls Forum, the Croydon Violence Against Women and Girls Forum, and the Croydon Expert by Experience Panel in developing this policy.

2.2 It will clearly define domestic abuse and the responsibilities of all staff and contractors working for the Housing Directorate to support victim/survivors.

2.3 This Policy defines the relationship between the Family Justice Service (FJS) which is a dedicated domestic abuse service in Croydon offering independent, confidential and non-judgemental support to people of all genders, and the Housing Directorate.

3. Scope and definition

3.1 The Housing Directorate's Domestic Abuse Policy applies to Council tenants in the Council's managed properties.

Domestic abuse is a crime and never the fault of the person experiencing it. We use the Government's definition of domestic abuse which includes many behaviours beyond physical violence.

3.2 The behaviour of a person towards another person is 'domestic abuse' if:

- they are each aged 16 or over and are personally connected to each other, and
- the behaviour is abusive.

3.3 Personal connection is defined as any two people who are or have been intimate partners or family members. This includes those that:

- are married to each other or in a civil partnership
- have previously been married or entered a civil partnership with one another (whether the agreement has been terminated or not)
- are, or have been, in an intimate personal relationship with each other
- have, or have had, a family relationship with each other
- have a child (whether they share parental responsibility or not)
- are relatives

3.4 Behaviour is abusive if it consists of any of the following, although this list is not exhaustive:

Types of domestic abuse	**Examples**
Physical or sexual abuse	Hitting, kicking, giving someone too much or unnecessary medication so they find it difficult to do things, touching someone where they do not wish to be touched, non-consensual sexual activities.
Violent or threatening behaviour	The use of threats of violence, use of weapons including knives and irons, objects being thrown.

Types of domestic abuse	Examples
Controlling or coercive behaviour	Controlling or monitoring the victim-survivors' daily activities, dictating what they can wear, or when they can eat. Coercion and control are not always violent.
Economic abuse	Controlling the family income, running up bills or debts such as credit/store cards in a victim's name without them knowing. Economic abuse involves any behaviour which has an adverse effect on the survivor's ability to acquire, use or maintain money or other property, or obtain goods or services.
Psychological, emotional, or other abuse	Being stopped from seeing friends, relatives or care workers, repeatedly being belittled, persuading a victim to doubt their own sanity or mind including "gaslighting", invalidating or manipulating the victim/survivor by "breadcrumbing". Definitions are available in Appendix A
Stalking and harassment	Following someone or monitoring their movements, waiting outside their home or workplace, spying on their activities such as looking through windows or using technology to track them. This also includes cyberstalking such as sending repeated unwanted messages or emails, using social media to track or harass someone, creating fake profiles to impersonate someone.
Forced marriage	Forcing someone into a marriage this can involve using violence, abuse, bribery, humiliation, or being told that they will bring shame on their family or the community, threats, financial control, being disowned or cut off, neglect or abduction.
Female genital cutting	The deliberate cutting or removal of a female's external genitalia.

Types of domestic abuse	Examples
Honour based abuse	Honour-based abuse (HBA) refers to harmful behaviours, such as violence, threats, coercion, or emotional abuse, carried out to protect or restore the perceived honour of a family or community. It often targets individuals seen as violating cultural or familial expectations, and may be triggered by: • Refusing an arranged marriage • Being in a relationship deemed inappropriate • Identifying as LGBTQ+ • Pregnancy outside marriage • Adopting "westernised" behaviours Victims are frequently accused of "bringing shame" or "dishonouring" their family or community.
Technological abuse	Hacking, video and image-based abuse online including deepfakes, revealing personal information about someone without their consent (also called doxing), being trolled, use of hidden cameras.

3.5 It does not matter whether the behaviour consists of a single incident or a course of conduct. It can happen at any point in a relationship, including after the relationship has ended.

3.6 As stated in the Domestic Abuse Act 2021, children are to be recognised as victims in their own right if they are living in a home where abuse is occurring between two parties over 16. This will be relevant when making any necessary safeguarding referrals to both children's and adult services.

3.7 People may not recognise their experiences as domestic abuse or identify themselves as a victim or survivor. This can be influenced by factors such as normalised patterns of controlling behaviour, cultural or religious beliefs, stigma, or previous experiences. We will respond sensitively and without judgement, avoid making assumptions about individuals or communities, explain abusive behaviours in clear and accessible language, and support people to make informed decisions at a pace that is right for them.

3.8 Domestic abuse can affect anyone. Women are disproportionately affected, particularly by repeated, severe and coercive abuse. Some individuals may experience heightened risks, additional barriers to seeking support, or specific forms of abuse because of their age, disability, race, ethnicity, culture, religion or belief, sex, sexual orientation, gender identity, pregnancy or maternity, immigration status, financial circumstances, or other intersecting characteristics and experiences. Our response will be inclusive, trauma-informed and person-centred, recognising individual circumstances without stereotyping or assuming that any group is unaffected by domestic abuse.

3.9. Gambling-related harm may be a feature of economic abuse, coercive control and wider patterns of domestic abuse. Examples may include taking money needed for rent, bills or essential living costs; pressuring or coercing a survivor to provide money for gambling; creating debts in their name; restricting access to bank accounts or finances; or using threats associated with gambling losses to exert control. Gambling does not cause, justify or excuse abusive behaviour. Equally, financial difficulties or gambling activity alone do not mean that domestic abuse is occurring. However, studies have found that gambling-related harm is associated with a significantly increased risk of violence, including domestic abuse. Staff will explore any concerns sensitively, seek to understand the context, and avoid victim-blaming while ensuring that appropriate support and safeguarding measures are considered.

4. Legal framework

4.1. This Policy will ensure compliance with the following standards and legislation and promote good practice.

Legislation:

- Domestic Abuse Act 2021
- Family Law Act 1996
- Children Act 1989 and 2004
- Protection from Harassment Act 1997
- Anti-Social Behaviour, Crime and Policing Act 2014
- Care Act 2014
- Mental Capacity Act 2005
- Housing Acts 1985, and1996, and
- Localism Act 2011
- Human Rights Act 1998
- Equality Act 2010
- UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018
- Homelessness Code of Guidance for Local Authorities
- Home Office: Domestic Abuse Statutory Guidance, July 2022

- Regulator for Social Housing Consumer Standards, 2024

4.2 We will manage cases of domestic abuse in line with our safeguarding policies and procedures, and the Care Act 2014, where appropriate.

4.3 The Care Act 2014 sets out the specific safeguarding duties that apply to any adult who is 18 years or over who:

- has care and support needs
- is experiencing, or is at risk of abuse or neglect
- is unable to protect themselves because of their care and support needs.

4.4 If a survivor of domestic abuse meets the criteria above, we will refer them to the Council's safeguarding services

4.5 Domestic Abuse Statutory Guidance for Local Authorities:

Local authority duty	**Responsible service**
Make, or cause to be made, enquiries if it has reasonable cause to suspect that the adult is experiencing or is at risk of abuse or neglect.	Shared responsibility – Housing approach detailed in the Safeguarding Policy: Housing Management.
Determine whether any action should be taken, if so by whom, and what that action should be. All local authorities have safeguarding adult procedures to support such enquiries and coordinate action with partner organisations.	Adult Health and Social Care Safeguarding Policy: Housing Management
Arrange for independent advocacy to be available to adults who have difficulty in taking part in the process, and where there is no other appropriate adult to assist.	Adult Health and Social Care Family Justice Service can provide residents with Independent Domestic Violence Advocates. Housing can also facilitate for residents to be supported by a third party or advocate where necessary.
Co-operate with other agencies.	Co-operation across Croydon Council and with external services. Including cooperation between Family Justice Service

Local authority duty	Responsible service
	and Housing and work with the Police.
Establish a Safeguarding Adults Board for its area to provide assurance that local safeguarding arrangements and partners are acting to help and protect adults that are at risk of abuse of neglect. Safeguarding Adult Boards also have the authority to carry out Safeguarding Adult Reviews where an adult with care and support needs has suffered serious harm, neglect, or death.	Croydon Safeguarding Adults Board (CSAB)
Establish and maintain a service for providing people in its area with information and advice, including on how to raise concerns about the safety or wellbeing of an adult who has needs for care and support.	Facility in place for members of the public to raise a safeguarding concern about an adult online. An online form also available through the Croydon Safeguarding Adults Board.

5. Supporting Victim-Survivors to remain safe and sustain their tenancy

5.1 If the survivor agrees, they will be referred to the FJS. This is a specialist service within Croydon Council which can provide advice and support to survivors, this can include:

- work with Independent Domestic Violence Advocates (IDVAs)
- risk and safety planning
- legal remedies
- emotional support
- exploration of other options for support and advice. This may include contacting specialist community-based abuse services.

5.2 Remaining safe in their home

- Security measures available to victim/survivors will be recommended through the Family Justice Service in conjunction with the Tenancy Management team.
- If survivors would like to remain in their home, they will be referred to the Family Justice Service to access the Sanctuary Fund to make their home more secure.
- We will utilise legal powers available to us to prioritise safety.

- With their consent, we will refer survivors of domestic abuse to the Family Justice Service for ongoing support and risk management.

5.3 Finding alternative accommodation

- When safe to do so, the option of moving to another home will only be explored if this is agreed with the survivor.
- A management transfer is a case in which a tenant is moved quickly to another social housing property due to urgent circumstances that make their current home unsafe. The resident's safety must be assessed through a risk identification checklist for the identification of high-risk cases of domestic abuse, stalking and 'honour-based' violence. Residents who wish to request a management transfer and meet the agreed risk threshold will be considered for a transfer to another property.
- Requests for management transfers will be brought to a case panel in cases where the appropriate risk threshold is met.
- We will support the use of schemes enabling Council Tenants to move homes (including out of the borough), such as the Housing Moves Scheme.
- We will ensure that survivors have a secure social tenancy and need to be rehoused due to domestic abuse will be offered the same tenancy type when we make an offer of a new permanent home, in line with the Domestic Abuse Act 2021.

5.4 Ending joint tenancies and starting new tenancies

- A perpetrator is still a joint tenant even after they move out unless the survivor takes steps to end or transfer the joint tenancy.
- A survivor of domestic abuse can end a joint tenancy and can be moved to another property to begin a new sole tenancy. This can be done through a notice to quit which would end the tenancy on behalf of both tenants, on the condition that a new sole tenancy is granted. The usual conditions for ending a tenancy by notice to quit must be met.
- A mutual surrender to end the tenancy is possible when there is agreement from both parties.
- Where appropriate, records of a history of abuse will be considered when housing former or current perpetrators of domestic abuse. This will especially be taken into account when considering the location of their placement.

5.5. Where rent arrears, debt, or tenancy difficulties may be linked to domestic

5.6. abuse, including gambling-related harm, we will take account of the survivor's individual circumstances and work with relevant specialist services to develop a coordinated response. Before pursuing arrears, recovery or taking other enforcement action, we will assess and record any potential risks to the survivor and any children, consider whether alternative

approaches are appropriate, and seek management advice where required. Actions and communications must not inadvertently reveal a disclosure, increase risk, compromise safety planning, or create additional barriers to support. We will clearly explain the options available, including any limitations on the assistance Housing can provide. Disclosure of domestic abuse will be taken into account when decisions are made but does not, in itself, remove rent liability or guarantee a management transfer or alternative housing outcome.

5.7. We will provide or facilitate access to independent debt, welfare benefits and money advice alongside specialist domestic abuse support. Where gambling-related harm is identified, referral pathways will also include appropriate specialist gambling-harm services, including support for affected family members and others impacted by the behaviour. Support for the survivor and any children will be offered independently of the person responsible for the gambling-related harm. Access to support will not be dependent on the perpetrator acknowledging their behaviour or seeking treatment or assistance.

6. Supporting leaseholders

6.1. Leaseholders can access the same support services as Council Tenants offered through the Family Justice Service.

7. Approach to perpetrators of domestic abuse

7.1. Perpetrators of domestic abuse are accountable for their actions.

7.2. Where the available evidence supports it, we will use the legal tools and powers available to us, including evicting or excluding perpetrators from the home.

7.3. With permission of the victim-survivor when appropriate, we will take a robust stance against perpetrators of domestic abuse; where possible we'll take actions against individuals committing domestic abuse, including non-residents.

7.4. If the perpetrator is a resident of our property, we'll consider taking appropriate tenancy action against them, including evicting and excluding them from the home.

7.5. We will provide general housing advice to the perpetrator when requested.

7.6. Where the perpetrator is willing to confront their abusive behaviour, the Family Justice Service can offer referrals to the appropriate support services. Any support or action plan offered to the perpetrator will be centred around the voice and safety of the survivor of domestic abuse.

7.7. Perpetrator accountability will be considered alongside support for survivors and any children affected by domestic abuse. Where there is an

appropriate legal and evidential basis, we will consider proportionate tenancy enforcement or other relevant action, without requiring a criminal conviction as a prerequisite. Decisions will be informed by specialist advice, the survivor's views and wishes, the welfare of any children involved, and a documented assessment of risk and safety. Survivors will not be pressured to report abuse to the police, pursue criminal proceedings, or take responsibility for the perpetrator's behaviour.

7.8. Staff guidance will include up-to-date and verified referral pathways to Respect-accredited services and appropriate local perpetrator behaviour-change programmes. Any engagement with an alleged or suspected perpetrator will be carefully planned, taking specialist advice where necessary, and must not compromise the safety of the survivor or any children. Under no circumstances will information be shared that could reveal the survivor's location, contact details, support arrangements, or safety plan. Referral for gambling treatment or gambling-harm support may form part of a wider response but will not replace domestic abuse accountability measures or specialist perpetrator behaviour-change interventions.

8. Training and culture: A survivor- centred approach

8.1. All housing staff and contractors will undertake regular mandatory Domestic Abuse Awareness training. Training will be culturally sensitive and delivered and informed by a diverse group of professionals with the varied needs of Croydon's residents in mind.

8.2. Staff will be supported to access training and resources on the needs of marginalised communities experiencing abuse.

8.3. Staff in resident-facing roles will all undertake training relevant to their roles.

8.4. Training records will be maintained.

8.5. A rolling training programme will ensure that staff receive appropriate training on domestic abuse, coercive and controlling behaviour, economic abuse, trauma-informed practice, barriers to disclosure, intersectional and anti-racist practice, safe information sharing, and perpetrator accountability. Role-specific training will cover the identification and assessment of risk, the use of DASH where required, referral pathways, safeguarding responsibilities, and the application of professional judgement. Managers will monitor training completion, identify refresher requirements, and address any gaps in knowledge or competence.

8.6. Training will support officers to recognise potential indicators of domestic abuse and gambling-related harm, including rent arrears, recurring requests for financial assistance, problem debt, property damage, signs of distress, or inconsistencies in accounts of events. These indicators should be treated as prompts for further enquiry and assessment, not as evidence of abuse, gambling-related harm, or dishonesty. Staff will make sensitive enquiries using open, non-judgemental questions, in private and only

where it is safe to do so. They will avoid victim-blaming and will not regard gambling, financial difficulties, or related pressures as explanations, justifications, or excuses for abusive behaviour.

8.7. Managers will provide regular opportunities for reflective practice, case supervision, and access to specialist advice for staff involved in responding to domestic abuse. These arrangements will support effective decision-making, professional resilience, and the consistent application of policy, safeguarding responsibilities, and professional judgement. Training and competency records will clearly distinguish between general safeguarding awareness, domestic abuse training, and competence in the use of DASH where relevant to the role. Managers will use this information to identify refresher training needs, address gaps in knowledge or confidence, and ensure that staff receive appropriate support and development.

9. Identification and disclosure of domestic abuse

9.1 All staff in the Housing Directorate are responsible for raising safeguarding concerns in cases where domestic abuse is suspected, known or disclosed.

9.2 Staff and contractors are responsible for following our relevant safeguarding policies and procedures and the Care Act 2014.

9.3 Survivors/victims of domestic abuse can disclose abuse or request support through any avenue in the Housing directorate. With permission, a referral to the Family Justice Service will be made. Residents experiencing Domestic Abuse will be supported by staff in the Family Justice Service who specialise in this.

9.4 Residents may face a range of barriers to recognising, disclosing or seeking support for domestic abuse. These can include fear of not being believed, shame, stigma, language or communication barriers, disability, cultural or religious pressures, immigration concerns, financial dependence, social isolation, discrimination, and concerns about confidentiality. Some residents may also fear losing their home, the impact of rent arrears recovery or tenancy enforcement action, or potential consequences for their children. We will provide clear information about available support and the limits of confidentiality, agree safe methods and times of contact, and make reasonable adjustments to meet individual needs. Independent, qualified interpretation and communication support will be provided where required. Family members, friends, children, or alleged perpetrators must not be used to interpret, translate, or facilitate disclosures of domestic abuse.

9.5 Where the risk or evidence of domestic abuse is identified by staff members, survivor-led action will be taken.

9.6. We will work with survivors to identify the safest methods, times and locations for communication and establish whether phones, email accounts, online access, correspondence or other forms of contact may be monitored by the perpetrator. Staff will avoid discussing concerns in the

presence of an alleged or suspected perpetrator, leaving messages that could compromise safety, or sending communications that might inadvertently reveal a disclosure of domestic abuse. Survivors will be listened to and treated with respect and belief. They will not be expected to provide a full, detailed or consistent account at first contact, recognising that trauma, fear and safety concerns may affect how and when information is shared.

9.7. Employees experiencing domestic abuse will be supported through the Council's Employee Domestic Abuse Policy and relevant HR policies and procedures. Employees may face the barriers outlined in section 9.4, as well as concerns that disclosure could affect their employment, career progression, professional reputation or workplace relationships. Clear and confidential routes for seeking support will be promoted, including options that do not require disclosure to a line manager. Employees will be informed about who may need to receive information, the reasons for any information sharing, and the safeguards in place to protect confidentiality. Any sharing of information will be limited to what is necessary, proportionate and lawful.

10. Responses to domestic abuse

10.1 Croydon will not pressure victim/survivors to take legal action but will support them if this is a course of action they wish to pursue.

10.2 The voice of the survivor will be centred in our approach to domestic abuse and all people who choose to disclose domestic abuse will be treated in a sensitive, supportive, and non-judgemental manner. Victim/survivors' disclosures will be taken seriously.

10.3 We operate will a survivor-centred approach to domestic abuse. Victim/Survivors will be listened to and treated in a sensitive, supportive and non-judgemental way.

10.4 Victim/Survivors will be supported through the Family Justice Service.

10.5 Residents with No Recourse to Public Funds or who are seeking asylum may face additional barriers when accessing support and housing assistance. The Family Justice Service can provide advice, advocacy and support, including discussing the options available based on individual circumstances.

The Family Justice Service is available **Monday to Friday, 9.00am to 5.00pm (excluding bank holidays)**:

- **Telephone:** 020 8688 0100
- **Email:** fjc@croydon.gov.uk

Outside these hours, residents can contact the **24-hour National Domestic Abuse Helpline** on **0808 2000 247**. In an emergency, or where there is an immediate risk of harm, they should call **999**.

Specialist services for victim/survivors can be found through the Council's website: domestic abuse and sexual violence

10.6 If the survivor is pregnant and/or has children, the Family Justice Service team may also refer them to Children's Services where appropriate. Children's Services will assess whether the child or children may be in need of support, protection or services under the Children Act 1989. Referrals will be made in line with safeguarding responsibilities and, wherever possible, with the survivor's knowledge and involvement.

10.7. We will maintain and regularly review specialist referral pathways for domestic abuse support, including by-and-for services, independent financial and debt advice, gambling-related harm services, and support for children and young people affected by domestic abuse. Staff will ensure that survivors are provided with clear information about available options and, wherever appropriate, seek their informed agreement before making referrals. Where safeguarding responsibilities or other legal duties require information to be shared without consent, the rationale will be clearly recorded, and this will be explained to the survivor wherever it is safe and appropriate to do so.

10.8. Public information will provide clear guidance on housing options, local and national sources of support, and safe ways to contact Housing. Information will be available in accessible formats and, where appropriate, in relevant community languages. The domestic abuse webpages and digital resources will be reviewed regularly to support safe access, including the provision of a quick-exit function and clear advice that use of this feature does not delete browsing history or other digital traces. Information for individuals who wish to address abusive behaviour will include signposting to verified specialist perpetrator support and behaviour-change services.

11. Information storage and review

11.1 Domestic abuse cases will be logged, managed and reported in line with GDPR and data protection policies and data retention schedules.

11.2. The associated procedure will set out clearly what information is recorded in the Housing records on the approved housing management system (NEC), what information Family Justice Service records on its specialist case management system, and how relevant information is shared between services. Domestic abuse records will be clearly identifiable and maintained separately from general anti-social behaviour (ASB) records wherever appropriate, with proportionate access controls in place to protect confidentiality and safety. Staff will record the housing response, decisions taken, agreed actions and any risk information required for the performance of their role, while avoiding unnecessary duplication of specialist case records or the inclusion of information that is not relevant to housing management.

11.3. Relevant records will include safe contact arrangements, identified risks to the survivor and any children, relevant information about the perpetrator, risk assessments, referrals, the survivor's wishes, and agreed safety measures or actions. Where identified, information relating to gambling-related harm, economic abuse, tenancy management considerations and any enforcement activity will be recorded accurately, factually and without judgement or victim-blaming language. Equality, accessibility and communication needs information may be collected sensitively and, where appropriate, used to inform support planning, remove barriers to access, and monitor whether services are being delivered fairly and effectively.

12. Partnership working – roles and responsibilities

12.1 We will work with and collaborate with external support agencies, legal representatives, and the police.

12.2 We will work in line with the objectives of the Council's Violence Against Women and Girls (VAWG) strategy.

12.3 The Council works in partnership with the Family Justice Service which is made up of specialist domestic abuse services to support survivors of domestic abuse.

12.4 Information sharing arrangements are in place with other agencies where required. These include risk management panels such as the Domestic Abuse Protection Order Panel.

12.5 Housing will nominate named representatives, together with appropriate deputy or cover arrangements, for relevant safeguarding and domestic abuse forums, including **MASH**, **MARAC** and the **Domestic Abuse and Sexual Violence (DASV) Partnership Board**, where applicable. Operational case discussion forums and strategic partnership boards serve distinct functions and responsibilities. Attendance at, or participation in, one forum will not be regarded as evidence of engagement with another.

12.6 Where MASH does not produce formal minutes, Housing will maintain a secure and proportionate record of its participation, including the cases in which it has a role, any threshold decisions communicated at the meeting, relevant advice received, and agreed actions. The associated procedure will set out responsibilities for recording, follow-up actions, access controls, information sharing, and retention requirements. Only information that is necessary, relevant and proportionate to Housing's role will be retained.

12.7 Housing will maintain anonymised or aggregated management information that distinguishes, where relevant, between temporary accommodation, council tenancy, private rented housing and other housing-related cases. This information will be used to monitor attendance, workload, outcomes and the completion of agreed actions, and to support service planning and quality assurance. Identifiable case information and personal case lists will not be circulated for general performance management or reporting purposes.

13. Competence

13.1 All staff undertaking roles where they could be expected to refer a resident to domestic abuse support will undertake mandatory training, this will enable all staff to be competent in identifying the signs of domestic abuse.

14. Quality assurance

14.1 We will review this policy periodically to ensure that it remains compliant with the latest legislation, regulations and best practice developments.

14.2 We will regularly review this policy to reflect feedback, local Domestic Homicide Review and Serious Case reviews, where recommended.

14.3 Managers will implement a regular domestic abuse case audit programme to assess the quality and effectiveness of case management and service delivery. Audits will review, as appropriate, safe contact arrangements, risk identification and recording, referrals and follow-up actions, survivor involvement in decision-making, equality and accessibility considerations, perpetrator accountability, and the impact of rent arrears recovery, tenancy enforcement or other housing decisions on survivor safety and wellbeing. Reviews will also consider the identification and management of gambling-related harm, compliance with information-sharing requirements, and the quality of record keeping. Audit findings will be documented and used to inform supervision, learning, continuous improvement, and service development, with clear actions identified, monitored and reviewed.

15. Performance reporting

15.1 The outcomes of this policy and the efficacy of our approach will be regularly reviewed.

15.2 Judgements on the efficacy will be based on reporting on the outcomes of disclosures.

15.3 Updates on the progress of imbedding this policy will be reported to the Domestic Abuse and Sexual Violence Board.

15.4 Performance reporting will include information on training completion, coverage and identified gaps; case audit findings and the implementation of resulting improvements; referral activity and follow-up; and Housing's contribution to multi-agency safeguarding and domestic abuse arrangements. Reporting will also consider learning from survivor feedback and available outcome information, ensuring that this is gathered, analysed and presented in a safe, ethical and proportionate manner. Low levels of disclosure, reporting or service uptake will not be assumed to indicate a low prevalence of domestic abuse, reduced need for support, or an effective service response. Performance information will be considered alongside other evidence, including audit findings, staff feedback, partnership intelligence and local need.

16. Roles and responsibilities

16.1. Director of Housing Management

The Director of Housing Management will have overall responsibility for the implementation of the Domestic Abuse policy.

16.2 Heads of Service

The Head of Tenancy will develop, implement, and monitor the effective management of domestic abuse in council tenancies, including appropriate management of domestic abuse referrals and service level agreements with partnering contractors, to ensure the Council delivers and efficient and value-for-money service, by exceeding key performance indicators (KPI's) and financial targets.

The Head of Tenancy will ensure the services comply with all property-related health and safety legislation and regulations and has an up-to-date knowledge of Policy at a national and local level, to inform the Council of any changes. The Domestic Abuse policy and associated procedures are embedded within the operational delivery of tenancy management, and all staff are aware of their responsibilities and are adequately trained to carry them out

16.3 Council staff and Contractors

Will follow the Domestic Abuse Policy and related Policies, the associated rules, and procedures, and have an awareness of property-related legislation and regulations to ensure the operational delivery is fair and consistently delivered across our services. Staff and contractors are aware of their roles and responsibilities and regularly carry out mandatory and personal development training offered to them.

17. Related documents

17.1 Related Documents

The following related documents should be read alongside this policy:

- Tackling Violence Against Women & Girls Plan 2024-2027
- Conditions of Tenancy - Clause 26

17.2 Housing Policies

The following Housing Policies are available on the Council's Website: Housing policies, plans and strategies | Croydon Council

- Safeguarding policy
- Tenancy management policy
- Anti-social Behaviour Policy
- Housing Allocations Scheme
- Income Recovery Policy

- Repairs and maintenance Policy

17.2 Internal procedures and guidance

The following internal procedures and guidance support staff with the implementation of this policy

- Bad Debt and Write Off
- Verified Domestic Abuse Referral Directory
- Domestic Abuse Operational Procedure
- Employee Domestic Abuse Policy and Manager Guidance
- Information Sharing and Records Retention Procedures

All related policies, procedures and guidance should cross-reference this Domestic Abuse Policy where relevant and explain how domestic abuse risks, safeguarding considerations and survivor safety may affect service delivery, decision-making and enforcement activity. This should include, where applicable, decisions relating to rent arrears recovery, tenancy enforcement, housing allocations, temporary accommodation, repairs, information sharing and staff support.

Related documents should promote a consistent, survivor-centred and trauma-informed approach across services, ensuring that domestic abuse is appropriately identified, considered and responded to within operational procedures, risk assessments and service decisions.

18. Equalities

18.1 The Council is committed to promoting fair and equal access to services and equal opportunities in employment, the procurement of goods and as a community leader. The Council's policies, procedures and day to day practices have been established to promote an environment which is free from unlawful and unfair discrimination, while valuing the diversity of all people.

18.2 Discrimination on the grounds of race, nationality, ethnic origin, religion or belief, gender, marital status, sexuality, disability, and age is not acceptable: the Council will take action to ensure no person using the council's premises or services receives less favourable treatment or is disadvantaged by requirements or conditions that cannot be justified. The Council will tackle inequality, treat all people with dignity and respect and continue to work to improve services for all service users.

18.3 The legal framework for the Council's approach is provided by the Equality Act 2010 and specifically by the Public Sector Equality Duty, under which a public authority must work consciously to eliminate discrimination, harassment, and victimisation, and to advance equality of opportunity and foster good relations between people with differing characteristics.

18.4 Further detail on the Duty, and the Council's approach to fulfilling its requirements, can be found on our website Equality and diversity | Croydon Council.

19. Appeals and complaints

1.1 Should there be a complaint from a tenant concerning, any aspect of domestic abuse handling, this will be dealt with via the Council's Corporate Complaints Policy.

20. Consultation

20.1. The document has been co-produced with the Family Justice Service, Croydon VAWG Network, Croydon BAME VAWG Forum, and the Croydon Expert by Experience Panel.

20.2 Stakeholders with responsibility and operational knowledge of Domestic Abuse and victim/survivors have, have been consulted during the development of this policy.

20.3 Residents have also been engaged and consulted in the review of the Domestic Abuse Policy.

20.4 Proposed changes to this policy, associated procedures and supporting guidance will be reviewed in consultation with the Family Justice Service and, where appropriate, survivor representatives, including individuals with lived experience of barriers to disclosure, economic abuse and other factors that may affect access to support. Participation will be voluntary, informed and conducted in a way that prioritises safety, confidentiality and wellbeing. Any relevant research, evidence or best practice relating to gambling-related domestic abuse identified by colleagues or partner organisations will be considered and, where appropriate, incorporated into guidance, training and service development.

20. Monitoring and review

21.1 This policy will be reviewed every 3 years, or sooner if required by statutory, regulatory, best practice, emerging developments, or circumstances arising from reviews of other Council wide policies.

21.2 Arrangement for a full internal audit of our domestic abuse processes will be undertaken by the Council's Internal Auditors. The full scope of the audit will be agreed upon with the Internal Auditors, Director of Housing Management, and Heads of Service.

21. Document control

21.1. This is a controlled document and should not be changed unless by authorisation of the policy owner

Monitoring	
Approved Date:	19 November 2026
Next Review Date:	November 2029
Effective date:	19 November 2026
Consultation Review	
Stakeholders review:	6 November 2026
Legal review:	12 November 2026
Residents reading group:	16 September 2025 (Version 1.0)
Policy owner:	Director of Housing Management
Ratified by:	Housing DMT
Equality impact assessment:	The impact of this policy will be measured as it is implemented and used as part of a scheduled 1-year implementation compliance review.

Version History

Version Number	Summary of change	Author and Approver
1.0	New Policy (published January 2026)	Co-produced with the Family Justice Service, Croydon VAWG Network, Croydon BAME VAWG Forum and the Croydon Expert by Experience Panel. Residents have also helped review the Domestic Abuse Policy.
1.1	Reviewed to meet DAHA accreditation (November 2026)	Reviewed with the Family Justice Service, Croydon VAWG Network, Croydon BAME VAWG Forum and the Croydon Expert by Experience Panel.

Appendix A: Glossary of Key Terms Related to Domestic Abuse

This glossary provides definitions of terms that may be referenced in this policy. Understanding these terms is essential for recognising the varied forms of abuse that individuals may experience.

Term	Definition
Gaslighting	A form of psychological manipulation in which the perpetrator causes the victim to doubt their own memory, perception, or sanity.
Doxing	The act of publicly revealing private or identifying information about an individual online without their consent, often to intimidate or harass.
Breadcrumbing	A manipulative behaviour where minimal affection or attention is given to maintain emotional control or dependency, without genuine commitment.
Love Bombing	Excessive displays of affection and attention used to quickly gain trust and emotional attachment, often followed by controlling behaviour.
Hoovering	Attempts by an abuser to re-establish contact or reconciliation after a period of separation, often using guilt, false promises, or affection.
Trauma Bonding	A strong emotional connection formed through repeated cycles of abuse and reconciliation, which can result in loyalty to the abuser.
Coercive Control	A pattern of controlling behaviours that isolate, intimidate, and dominate the victim, including monitoring, threats, and restriction of freedoms.
Deepfakes	Are digitally altered videos, images, or audio recordings that use artificial intelligence, particularly deep learning, to convincingly mimic real people's appearance, voice, or actions.
Trolling	Deliberately posting provocative, offensive, or disruptive messages online to upset others, start arguments, or derail conversations.