

## Appendix 2: Swale Domestic Abuse Policy Consultation Responses

### Responses from Public Survey

Question/response	Officer Comments and recommendations
<p>General information gathered: 10 responses – 7 from residents, 2 from public sector agencies, 1 from voluntary/community sector agency</p> <p>The greatest age group of responses was 45-54 (4), followed by 55-64 (2).</p> <p>A greater proportion of females responded to the survey (7).</p> <p>8 of those that responded were of White ethnicity.</p>	<p>For noting only.</p>
<p>Of those that responded to the survey, 3 identified themselves as someone with lived experience of domestic abuse. 3 identified themselves as an advocate agency. 4 identified themselves as other.</p>	<p>We have sought to engage with those with lived experience of domestic abuse, or those that can advocate on their behalf, in the development of this policy.</p> <p>No recommended changes at this stage.</p>
<p>None of the responders had previously engaged with the Council for support as a domestic abuse victim.</p> <p>However, one response stated: Survivors' experience is crucial for understanding the situations that are suffered. Particularly the impact on children of a parent shouting abuse on a regular basis. I found Alanon most helpful for me, (this was years ago). I would not have gone to the council for help then. There was a huge amount of stigma which created barriers.</p>	<p>We have sought to engage previous victims of domestic abuse that had made use of Council services, with the creation of this Policy, but have recognised it has been difficult to do so.</p> <p>This feedback is useful that at the time this victim was requiring help, they would not have felt confident going to a Council.</p> <p>No recommended changes at this stage.</p>
<p>Respondents were asked whether they feel each of the proposed principles within the Policy were achievable by the Council.</p>	<p>Overall, respondents were positive about the achievability of the proposed principles.</p>

To work in partnership with external agencies to ensure the most appropriate response is in place as a Borough to victims and survivors of domestic abuse, working towards a Coordinated Community Response – 90% felt this was achievable, 10% not sure.

To ensure our staff have the correct skills, tools and knowledge to effectively respond to victims of domestic abuse – 80% felt achievable, 20% not sure.

To ensure that all practice is underpinned by safety led case management - 80% felt achievable, 20% not sure.

That a survivor led approach is taken to all service development – 70% achievable, 10% not achievable, 20% not sure.

To provide inclusive services that are accessible and meet the individual needs of all – 60% achievable, 10% not achievable, 30% not sure.

To consider our role in how perpetrators of abuse are held to account for their behaviour and seek to ensure appropriate support services are in place for them - 60% achievable, 20% not achievable, 20% not sure.

To actively promote our domestic abuse response – 100% achievable.

To have a trauma informed approach to supporting victims and survivors - 80% felt achievable, 20% not sure.

Comments made in relation to the achievement of these principles included:

- we must have perpetrator programmes, without these the responsibility remains on survivors
- If it doesn't already, include information on how the organization supports employees experiencing DA, and provide support around their Health and wellbeing

The main concern raised relates to the principle regarding our response to perpetrators.

It is recognised that SBC's response to changing perpetrator behaviour is limited, however the wording of the principle is to consider our role and seek to ensure services are in place. At this stage, no changes are recommended to the wording of this principle.

No recommended changes at this stage.

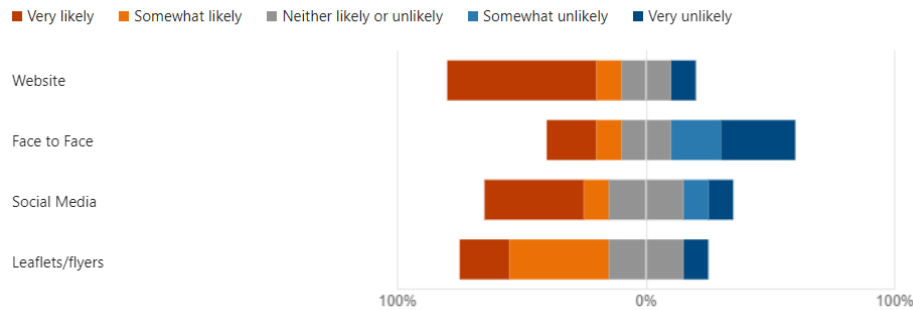
<ul style="list-style-type: none"> <li>- Well rounded Policy</li> <li>- Training for staff needs to be kept up to date and repeated annually. Will the voice of survivors be heard? Maybe by way of a survivors forum to ensure survivor led approach? It is widely known that reports of DVA and VAWG rarely lead to conviction of perpetrators. More needs to be done in this area. Same sex relationships are mentioned but what about the trans community or disabled people or those with lack of capacity ie dementia or learning disabilities.</li> <li>- It is all good - however perpetrators are skilled at lying - and it is difficult to prove their culpability unless your team are really well trained</li> <li>- The principles seem reasonable but given that few staff interact with the public and many staff work from home, albeit with comms, how effective can these principles be?</li> </ul>	
<p>Responders were asked to comment on the role name of domestic abuse champion. 6 responders felt this was not an appropriate term and 3 agreeing it was.</p> <p>Alternative terms suggested included:</p> <ul style="list-style-type: none"> <li>- Domestic Abuse Advisor</li> <li>- Stop Domestic Abuse Champion</li> <li>- Domestic Abuse Liaison Advisor</li> <li>- Domestic Abuse Advocate</li> </ul>	<p>The majority of responders felt that the term domestic abuse champion was not appropriate. A number of other suggestions were made, but domestic abuse advocate feels like the most appropriate alternative suggestion.</p> <p>Recommendation: Change term of Domestic Abuse Champion to Domestic Abuse Advocate.</p>
<p>Responders were asked to comment on how the Council works in Partnership to support victims, families and survivors of domestic abuse. Responses included:</p> <ul style="list-style-type: none"> <li>- We need to see more DVPOs and a lot more work with perpetrators</li> <li>- continue working in partnership for victim/survivors to be empowered them with choice of agencies that is accessible.</li> </ul>	<p>A number of comments were made by responders regarding the strength of existing partnership working by SBC. A concern was raised about partnership working with the Police, due to a loss of confidence due to national media. This is something already being picked up by the Community Safety Partnership.</p>

- Great work and good policy
- All agencies need to be involved - police, social care, health care, legal, charitable sector
- I have concerns about your potential partnership with the police. The police have recently failed to identify abusers within their own teams, resulting in loss of life. I hope that you also do enough checks on your own personnel to root out misogyny and victim blaming?
- Essential that all professional colleagues communicate effectively - and actually listen
- Helpful to understand how SBC and its staff are actually involved, other than to report abuse.

No recommended changes at this stage.

Responders were asked how likely they were to access domestic abuse support information and guidance from the Council via specific means.

Website, social media and leaflets/flyers were shown to be the most likely, with face to face the least likely.



Alternative suggestions included:

- Link to domestic abuse services included on SBC website home page
- Public toilets and buses
- Face to face at community hubs and pharmacies

The responses clearly showed that it was felt face to face was not a likely mechanism for engaging with the Council.

These responses are useful to use in publicity/awareness raising work going forward.

No recommended changes at this stage.

<ul style="list-style-type: none"> <li>- Posters in public spaces – leisure centre, gyms or targeting young girls at school who are in new relationships – give examples to help them recognise what is abuse.</li> </ul>	
<p>Responders were asked if they had any comments on SBCs proposed approach to tackling perpetrator behaviour. Comments made were:</p> <ul style="list-style-type: none"> <li>- I think SBC's partnership working is very strong.</li> <li>- Working together to run groups for perpetrator within Swale</li> <li>- More work is needed for children who have witnessed abuse</li> <li>- There needs to be better conviction rates and less victim blaming</li> <li>- I have already commented that abusers 'lie through their teeth' and are often charming when approached. Criminal behaviour is what it is - 'support' seems a bit generous. Do you mean some kind of campaign to educate these (usually) men at their clubs - golf/football etc??</li> <li>- " Holistic" is less than helpful. if staff see, hear or are aware of domestic abuse it should be properly reported and followed through. Perpetrators would in most cases need to be dealt with by the police or mental health services, unless it also related to children.</li> <li>-</li> </ul>	<p>Responders have made a number of useful comments about SBCs approach to tackling perpetrators. The White Ribbon Campaign is already mentioned to tackle men’s views about violence towards women.</p> <p>No recommended changes at this stage.</p>
<p>Responders were asked if they had any comments in relation to SBCs proposed preventative approach to domestic abuse. Comments made were:</p> <ul style="list-style-type: none"> <li>- We need to work with children and young people around healthy relationships etc. Is this happening?</li> <li>- More support within schools to look around positive relationships.</li> <li>- Schools are a key place to do this. Children need to learn what a healthy relationship looks like from a young age, even primary school age.</li> <li>- I am very glad for this initiative, and only hope that you will be able to fund the refuges which are oversubscribed. Education is vital to preventing abuse, but listening to young girls who can't talk to their parents - how do you organise that?</li> <li>- Early years engagement, from secondary school level upwards</li> </ul>	<p>A number of comments have been made about work required with young people around healthy relationships. The Council are already working in partnership with agencies such as SATEDA on this.</p> <p>Recommendation: Wording within Prevention section to be amended to reflect wider existing partnership work on children and young peoples services.</p>

<ul style="list-style-type: none"> <li>- Not sure how practical this is, unless there are sufficient preventative resources available.</li> </ul>	
<p>Responders were asked if they had any comments on how SBC will respond to domestic abuse. Comments made were :</p> <ul style="list-style-type: none"> <li>- A focus on the perpetrator</li> <li>- Victims and survivors need to know where to go and be able to speak to anyone they come into contact with, whether that be GP, pharmacy, housing agencies etc.</li> <li>- It all sounds good, Publicity for the initiative will be key. It seems like you are taking domestic abuse seriously but it is long overdue.</li> <li>- All responses need precise documentation, follow through and investigation</li> </ul>	<p>Useful comments have been made in relation to use of publicity. This can be included within the domestic abuse procedures being compiled.</p> <p>No recommended changes at this stage.</p>
<p>When asked, do you think the Policy and local services meets the need of those with protected characteristics, 7 responded that they didn't know. Only 1 responded yes and 1 responded no.</p>	<p>This result may be indicative that those responding are not those either with protected characteristics, or an advocate on their behalf.</p> <p>It has already been identified within the Policy within the main principles and also within section 13.5 that a tailored response to victims must be provided.</p> <p>Recommendation: Section 13.5 be extended to stress that consideration must be given to those with protected characteristics and whether more specialised by and for service referrals are needed.</p>

### Consultation response from Standing Together

Through the Domestic Abuse Housing Alliance (DAHA) accreditation, Swale BC are allocated a regional lead from Standing Together to advise on how to meet the required standards for the accreditation. A copy of the draft domestic abuse policy was shared with this lead and the comments are shown in the below table.

<b>Standing Together/DAHA National Lead Comments</b>	<b>Officer Comments and recommendations</b>
<p>Section 1 Introduction: This is a great starting document and its great to see you starting to think about implementing the DAHA principles within this.</p> <p>Something that felt a little unclear is who this policy is aimed at both in terms of language used and content.</p> <p>Ideally, it needs to be written with the victim/survivor in mind as the audience, and as a document that is going to support disclosure, therefore the language needs to be non-judgmental and supportive throughout.</p> <p>It would be good to ensure that the information that is most relevant/important to victim/survivors comes first so that they can get to the information they need quickly.</p> <p>As you are developing a procedural document to correspond with the policy, it means that some of the more procedural information which will be pertinent to staff can be moved into the procedure, helping to keep the policy as focussed as possible.</p> <p>We discussed in our meeting last week that it is important to have a separate policy for staff who maybe experiencing DA, or encounter it within the context of work. This may also help you to distinguish the outward customer facing policy from the internal staff policy.</p>	<p>Comments made within this section have been picked up in following sections of this table.</p> <p>A staff domestic abuse policy is being created which will be aimed at staff that are victims and how they can be supported. This policy is aimed at members of the public but is also in place to show staff what is expected of them in terms of a response.</p> <p>A procedures document is also being compiled for staff, which will provide more detail of the sections discussed within this Policy.</p>

<p>Diversity and intersectionality is a really crucial part of the DAHA accreditation and is embedded as one of our core principles. We appreciate this is a big and somewhat complicated topic. But it would be great to see more mention of protected characteristics, intersectionality and the additional challenges that may be faced by victim/survivors in accessing support, and how you will support them. This will include not just those in same sex relationships, but recognise that there may be increased experiences of DA as well as additional challenges by customers who are elderly, young people, minority ethnic, LGBTQ+, those with multiple and complex needs including mental health, alcohol and substance misuse concerns, learning disability, male.</p> <p>See comments throughout with some suggestions for change.</p>	
<p>Section 2.2 – Purpose: I think it would be helpful to be clear about who this policy is aimed at. This covers a lot of bases. The language needs to be written with victim/survivors as the primary audience, so they know what they can expect from you for support. And then the procedures can go into more detail to support staff in actioning what you are setting out in your policy.</p> <p>It is good to recognise that SBC has legal responsibility, but in order for this to feel more person centred and less an obligation, perhaps this could be mentioned after the rest of the sentence about what victim/survivors can expect.</p>	<p>Agree that wording of this section could be strengthened to reflect focus on victims and survivors.</p> <p>Recommendation: Wording of purpose section to be revisited to reflect focus on victims and survivors.</p>
<p>Section 3.1 – Definition Use wording from the DA Act 2021. <a href="https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted">https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted</a></p> <p>Section 3.2 – Online or digital abuse I really like that you include this. Whilst not specified in the DA Act, (falls under 'other abuse'. I think its useful to mention this as it is an ever developing form of abuse used by perpetrators.</p>	<p>The definition of domestic abuse within the Policy was compiled using wording within the Domestic Act 21, but to ensure it was also written in an accessible and easy to understand manner. However, this can be reviewed to ensure it includes all elements to be discussed in the act. Also agree to amend wording in section 3.4 and add in further section on equality and diversity in this section.</p>



<p>Section 3.4 I would change the wording from 'witnessing' to 'experiencing' as the new definition recognises that children don't just witness abuse, they experience it.</p> <p>This would be a good place to include a paragraph relating to Equality and Diversity, so about victim/survivors who experience DA with protected characteristics and recognise the importance of intersectionality, the increased prevalence of abuse within these populations and the additional barriers in accessing support they may face.</p>	<p>Recommendation: Section 3 to be amended to reflect wording from the Domestic Abuse Act; section 3.4 wording to be amended and additional paragraph on equality and diversity to be added.</p>
<p>Section 4: Swale Context It is interesting to know about context within Swale. But I'm not sure all this is necessary for the policy and makes it less accessible. Is it possible to condense this to just the highlights.</p>	<p>Agree that figures in relation to domestic abuse may not be deemed as appropriate for victims.</p> <p>Recommendation: Wording of Swale context section to be reviewed and condensed.</p>
<p>Section 5: Legal Duties Again, I think it's useful to highlight that SBC have a legal duty, but this much text is a lot to get through. Rather than include what each act stipulates, you can signpost to the act and just bullet point the acts linked. If you wish to include this much detail, it might be better to include the Acts as appendices.</p>	<p>Agree with comments made about legal duties as this is a public facing document.</p> <p>Recommendation: Wording of legal duties to be reviewed and condensed.</p>
<p>Section 6.1 : Policy Principles It would be good to mention more about other protected characteristics and intersectionality here, as presumably the inclusivity of the service is not just limited to sexuality and gender, but also ethnicity, age etc. As this is so integral to your approach of supporting victim/survivors, it should be listed nearer the top of this list of principles.</p>	<p>Agree with comments made about protected characteristics and intersectionality.</p> <p>Recommendation: wording and order of principles to be amended.</p>
<p>Section 6.2: Scope Some of this repeats what has already been stated. Could this be incorporated into the introduction? 6.2.3 - This is a great description of the procedures and what needs to be covered.</p>	<p>Officers feel that the wording of the scope should remain as it is.</p> <p>No recommended changes at this stage.</p>

<p>Section 7: Roles and Responsibilities</p> <p>I think its useful to highlight responsibilities of each set of staff's responsibilities. However, this information may be better placed in the procedures. Instead here, you could include details that are more vicitm/survivor directed, including who they can speak to/who may ask them about DA and what they can expect from any disclosure.</p>	<p>A staff domestic abuse policy is being created and details of these roles will be included here. Officers feel it is useful for victims/survivors to understand the different roles within the council and the response expected from them. This information will also be reflected with the procedures once completed.</p>
<p>Section 8: Training</p> <p>This can move to procedure document.</p>	<p>A staff domestic abuse policy is also being compiled which will reference training, along with a procedural document. Believed to be useful to continue to have this section within the Policy as shows to victims that staff are adequately trained.</p> <p>No recommended changes at this stage.</p>
<p>Section 10: Publicity/awareness raising</p> <p>Again, this is more procedural.</p>	<p>Officers feel that information contained within this section is useful for victims to be made aware of. Further detail will be within procedures once finalised.</p> <p>No recommended changes at this stage.</p>
<p>Section 11: Perpetrators</p> <p>Response to perpetrators should come after response to victim/survivors.</p>	<p>Officers agree with this point. Perpetrator section to be moved further back into policy.</p> <p>Recommendation: Perpetrator section position within the Policy to be reviewed.</p>
<p>Section 13: Responding to Domestic Abuse</p> <p>This section should come earlier in the policy. It also comes across as if written for staff rather than victim/survivors so consider re-writing with victim/survivors as primary audience.</p> <p>This is directed at staff. It would be good to let victim survivors know who they can talk to about DA first.</p> <p>Tailored Response - This language feels like it is focussing on a willingness of victims to engage, Victim/Survivors may be unable to engage with services due to the abuse they are experiencing.</p>	<p>General comments about audience for policy have been noted and have been considered throughout policy. Some sections may be more of note for staff, but whilst staff policy is being drafted, is felt to be useful to be included within this overarching one too.</p> <p>Recommendation: wording of tailored response section (now 7.5.1) to be revisit to reflect comments about wording.</p> <p>Recommendation: Section to be moved to earlier within policy.</p>