

Guidance for organisations on producing a workplace policy for responding to domestic abuse, sexual violence and stalking

For internal responses to staff and external responses to member of the public/clients

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1. Introduction

Domestic abuse, sexual violence and stalking are issues that take place at all levels of society, regardless of gender, social class, race, religion, sexuality, or disability¹. The response to these issues is everybody's business and employers have an important role to play in society's response; owing a duty of care to employees and a legal responsibility to provide a safe and effective work environment.

The cost of domestic abuse alone to business is estimated at £1.9 billion a year due to decreased productivity, time off work, lost wages, and sick pay. It can potentially have an adverse impact on staff morale, as well as on an organisation's image and reputation².

Public facing organisations also have a duty to ensure their staff are aware of their responsibility to effectively identify and respond to domestic abuse, sexual violence and stalking amongst the members of the public they serve.

1.1. Purpose of guidance

This document has been produced to:

- Outline the importance of developing a workplace policy for responding to domestic abuse (DA), sexual violence (SV) and stalking.
- Provide guidance on how to produce a workplace policy to respond to employees affected by domestic abuse, sexual violence, and stalking.
- Provide guidance on how to produce a policy for frontline organisations to ensure appropriate identification and response to domestic abuse, sexual violence and stalking disclosed to staff by members of the public.

This guidance is designed to support all organisations in Gloucestershire, and should be read in conjunction with individual organisations' HR policies, practices and codes of conduct as well as any national guidance and legislation on workplace policies.

This guidance is not designed to provide an exhaustive list of possibilities for organisational responses, and organisational policies and practices must be driven by appropriate leads, for example: HR, safeguarding or organisational leads for domestic abuse, sexual violence, and stalking.

1.2. Definitions

1.2.1. Definition of Domestic Abuse

Domestic abuse is defined in section 1 of the Domestic Abuse Act 2021:

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—

¹ Department of Health

² BITC Domestic Abuse toolkit for employers

- *physical or sexual abuse;*
- *violent or threatening behaviour;*
- *controlling or coercive behaviour;*
- *economic abuse (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.

Definition of "personally connected"

Two people are "personally connected" to each other if any of the following applies:

- *they are, or have been, married to each other;*
- *they are, or have been, civil partners of each other;*
- *they have agreed to marry one another (whether or not the agreement has been terminated);*
- *they have entered into a civil partnership agreement (whether or not the agreement has been terminated);*
- *they are, or have been, in an intimate personal relationship with each other;*
- *they each have, or there has been a time when they each have had, a parental relationship in relation to the same child (a person has a parental relationship in relation to a child if the person is a parent of the child, or the person has parental responsibility for the child);*
- *they are relatives.*

Children as victims of domestic abuse

Any reference in the Domestic Abuse Act 2021 to a victim of domestic abuse includes a reference to a child who

- *sees or hears, or experiences the effects of, the abuse, and*
- *is related to A or B.*

1.2.2. Definition of Sexual Violence

The World Health Organisation (WHO, 2002) defines sexual violence as:

"Any sexual act, attempt to obtain a sexual act, unwanted sexual comments or advances, or acts to traffic, or otherwise directed, against a person's sexuality using coercion, by any person regardless of their relationship to the victim, in any setting, including but not limited to home and work."

Types of sexual violence includes (not an exhaustive list):

- Rape/attempted rape
- Assault by penetration
- Sexual assault
- Sexual harassment
- Childhood sexual abuse
- Child exploitation
- Female genital mutilation

- Trafficking for the purposes of sexual exploitation
- Forced prostitution
- Sexting
- 'Revenge porn'

1.2.3. Definition of Stalking

The Suzy Lamplugh Trust defines stalking as³:

A pattern of fixated and obsessive behaviour which is repeated, persistent, intrusive and causes fear of violence or engenders alarm and distress in the victim.

Stalking can most easily be defined using the mnemonic FOUR:

Fixated

Obsessed

Unwanted

Repeated.

Stalking is often a feature of domestic abuse as well as something that can be experienced by strangers, acquaintances, friends, colleagues etc.

1.2.4. Definition of Honour Based Abuse and Forced Marriage

Karma Nirvana (national specialist charity) define Honour Based Abuse as⁴:

Any incident or pattern of controlling; coercive; manipulative; intimidating; or threatening behaviour, violence, or abuse perpetrated by one or more family, extended family, and/or community members and/or current/former intimate partners in response to perceived or alleged transgressions of accepted behaviours. While most often perpetrated against women and girls, anyone can experience honour based abuse regardless of age, ethnicity, sexuality, religion, or gender, including men and boys.

It can encompass but is not limited to:

Psychological, emotional, physical, sexual, spiritual and faith-related, economic, financial, and hate-aggravated abuse; forced marriage; female genital mutilation; abduction; isolation; threats; murder; and other acts of domestic abuse.

2. The importance of having an organisational policy for DA, SV and Stalking

A detailed DA, SV and stalking policy allows organisations to demonstrate that they take these issues seriously and have mechanisms in place to support employees in dealing with the effects of violence and abuse. It also enables organisations to ensure they are able to respond to perpetrators of abuse where appropriate and necessary.

³ [Suzy Lamplugh Trust](#)

⁴ [Karma Nirvana](#)

The nature of DA, SV and stalking means that they can impact anyone at any time, and all organisations should therefore be mindful that colleagues or employees may be experiencing this type of violence and abuse or still dealing with the impact of having previously experienced it.

For public facing organisations, a policy will provide the public with reassurance that DA, SV and stalking will be taken seriously with an effective response. This can improve public confidence in organisations and encourage victims to disclose to staff/managers, safe in the knowledge that those they divulge to will know how to respond effectively. It also provides management and employees with a framework and timeline, so they have a clear understanding of the process and timescales. This provides support and structure for all involved.

Individual organisations can make the choice as to whether they develop a bespoke DA, SV and stalking policy, or ensure it is included in existing HR or safeguarding policies.

2.1. Employer responsibility to respond to DA, SV and Stalking

Health and Safety laws that are designed to ensure workers have a safe environment to conduct their work and have their health and wellbeing considered are also supportive of the response to DA, SV and stalking. The main areas of health and safety legislation that are relevant to DA, SV and stalking are⁵:

- Health and Safety at Work Act 1974
- Management of Health and Safety at Work Regulations 1992
- Reporting of injuries, diseases and dangerous occurrences Regulations 1995
- Health and Safety (Consultation with Employees) Regulations 1996

Any workplace policy will need to ensure it is compliant with these laws, including where workers may work from home.

2.2. Impact of DASV on the employer and employees⁶

It is important for employers to recognise that if the organisation does not effectively respond to DA, SV and stalking (DASV) being experienced by their staff, there could be a negative impact on the organisation and its other employees as well as the individual impact to the victim. Research indicates that these issues costs businesses an estimated £2 billion per year as a result of⁷:

- Negative impact on productivity, performance and morale
- Increase in sick leave as a result of stress, anxiety or physical injuries
- Increase in time off to attend legal appointments or for counselling and support
- An increase in lateness, or even over-performance as a means of avoiding going home and increasing risk of burn-out
- Employers invest time and resources into recruiting staff, yet employees experiencing DA, SV and stalking may be forced to leave work by the abuser; may have to move

⁵ BITC Domestic Abuse: A toolkit for employers.

⁶ Domestic violence resource manual for employers, second edition. Refuge and Respect

⁷ <https://www.gov.uk/government/news/new-advice-to-help-employers-deal-with-domestic-abuse-and-stigma>

away and/or may have to give up work so that the abuser cannot locate them. Some employees may also be dismissed as a result of poor performance, absenteeism or disruptive behaviour caused by the abuser

- Research also suggests that perpetrators may be late for work, leave early, take time off and use workplace resources (such as telephones, emails or company cars) to threaten, harass, stalk or abuse their victim
- In the case of stalking, the victim may be targeted by a colleague or a client, impacting on how the organisation conducts its business
- The potential reputational and legal impacts on the organisation if there is a lack of an appropriate response to an alleged employee perpetrator
- The potential risk to other employees or clients due to the lack of an appropriate response to an alleged employee perpetrator

Other staff members may:

- Have to fill in for absent or unproductive workers
- Feel resentful towards victims who take time off or receive extra attention; take part in gossip/rumours about the victim
- Try to protect the victim from unwanted phone calls or visits
- Feel helpless and unsure about how to intervene
- Be distracted from their own work
- Experience a negative impact on their own mental and emotional health, especially if they may also be experiencing abuse themselves
- Fear for their own safety e.g. be followed by the abuser and subjected to questioning about how to contact the victim, or where they can be found
- Feel frustrated and excluded for not understanding workplace changes
- Unknowingly be used by the abuser as part of the abuse, perhaps by assisting the perpetrator to locate their victim or by covering up for the abuser at work
- Require additional support from experiencing secondary trauma
- Require safety measures to protect them if the perpetrator targets them due to their connection to the victim

2.3. Organisational responsibility to respond effectively to DA, SV and Stalking

Many front line organisations have a responsibility to effectively identify and respond to DA, SV and stalking in their dealings with members of the public. This responsibility is often placed on statutory services such as police, social care and health agencies.

It is important to note however, that any service that deals with members of the public has an important role to play in identifying and responding to DA, SV and stalking. Many public facing services will be presented with the signs and symptoms that someone is experiencing abuse, and may be the only service that an individual discloses their experience to; and therefore the only service with an opportunity to appropriately intervene or signpost to support.

Having a DA, SV and stalking policy therefore ensures staff are aware of the role they have to play and how they can ensure victims are signposted to appropriate support. It also provides the public with confidence in the service and will subsequently ensure staff feel supported;

clear in the expectations placed on them and the organisational support for the work that they do.

The nature of DA, SV and stalking means that they often stay hidden, but the more organisations and services that have policies in place for their staff to spot the signs, ask appropriate questions and risk assess, the better opportunities there are to prevent victims coming to serious harm.

It is also important to note that local areas have a statutory duty to conduct Domestic Abuse Related Death Reviews (formally Domestic Homicide Reviews) when a person is killed, or dies by suicide as a result of domestic abuse⁸. In these reviews, agency contact with individuals is analysed to ensure lessons can be learnt to improve service responses to DA in the future. In many cases, having a clear organisational policy on DA is a recommendation for many agencies to ensure they respond effectively and that their staff are aware of the expectations placed on them, they have the right skills to spot the indications of DA, and support is available for victims and staff.

3. Guidance on producing a DA, SV and Stalking policy to respond to employees as victims

Set out below are the key areas that should be included in organisational policies, responding to DA, SV and stalking experienced by employees.

This is not an exhaustive list, and policies need to be specific to individual organisations and in line with codes of conduct, HR and Safeguarding policies and practices. Organisations will also need to consider an approach that is relevant and proportionate based on the size of the organisation/business and the structures in place.

a) Definitions

Outline the areas of DA, SV and stalking that the policy intends to cover and the definitions the organisation will adopt.

This sets out the common language the organisation will use when dealing with these issues in the workplace.

b) Organisational commitment

Outline the organisational commitment to tackling DA, SV and stalking, and the way in which employees can expect to be responded to if they are experiencing or perpetrating these types of abuse.

This can be a broad statement, or more detailed outline. This could include:

- That disclosures of DA, SV and stalking are taken seriously, and victims will be believed, their needs and wishes will be listened to and central to any organisational response.

⁸ This may include an experience of sexual violence, HBA, FM and stalking if the person was 'personally connected' to the offender.

- Staff safety, health and wellbeing is at the forefront of the organisation's response and workplace culture.
- Risks and consequences of DA, SV and stalking are understood and will not be tolerated in any form.
- Employees experiencing DA, SV and stalking will be supported with staying safe in work and accessing specialist support to help with their safety outside of work.
- Colleagues will be provided with the skills to respond effectively to disclosures and know how to support those impacted by abuse.
- The organisational policy responses will be led from the top, with senior leaders advocating for the organisation's response to DA, SV and stalking.
- If the organisation has any champions within HR or other relevant departments who can support, or a lead role for this area of business.

Agencies may also wish to add detail into their policy that outlines any mechanisms they have to check and test that the policy is being adhered to and/or an escalation route for staff should they feel the policy is not being implemented in practice.

c) Confidentiality and record keeping

The policy should outline the organisational response to ensure confidentiality.

The policy should acknowledge that whilst the confidentiality of employees is of paramount importance, the organisation will be required to act within the limits of organisational safeguarding commitments. This may mean needing to share information with external agencies without the consent of the employee if the DA, SV and stalking disclosed;

- places a child at risk
- places a vulnerable adult at risk
- is considered high risk (in terms of the victim being at high risk of serious harm or homicide⁹)
- details that a serious crime has been committed

The policy should also provide guidance to managers about the records to keep if they become aware of a staff member experiencing DA, SV and stalking and where such confidential records should be stored.

It is important that managers keep an accurate record of their concerns and the response of the organisation and that this is held securely and confidentially.

d) Organisational response to employees who are victims of DASV

The policy should consider how to respond to employees who disclose they are experiencing DA, SV and stalking currently, or are struggling with the ongoing trauma of their previous experiences.

⁹ Risk is determined utilising the DASH risk assessment covered on page 11. Further guidance on completing the DASH can be found: [Support for professionals - Gloucestershire Domestic Abuse Support Service \(GDASS\)](#)

It is important that the policy is mindful of the language used and ensure the focus of the policy is on the individual and the role of being a supportive employer, not the business and the potential impact on performance, productivity etc. A policy that focuses on the business will prevent people from coming forward and it is important the policy enables survivors to disclose in the knowledge that they will be believed, empowered to make choices that work for them and supported by the organisation and through multi-agency processes where necessary.

The policy should also outline that any member of staff can support a colleague and the responsibility does not have to sit with a direct line manager; the member of staff experiencing abuse should be able to seek support from whoever they feel most comfortable talking to, and that there are clear mechanisms for ensuring the right support is provided to the victim and to the supporting colleague.

Identifying the signs and symptoms of DA, SV and stalking, and creating opportunities for disclosure:

Consider how staff, and managers in particular, will identify the signs that someone may be experiencing DA, SV and stalking and be confident in asking appropriate questions in the right environment.

Demonstrate how the organisation will create a positive work environment, which promotes staff wellbeing and enables staff to feel they can disclose their experience of DA, SV and stalking to a manager or colleague; and that the disclosure will be taken seriously and access to support promoted.

The signs and symptoms that someone may be experiencing DA, SV and stalking may be displayed in the workplace in the following ways (non-exhaustive list):

- A change in the person's working patterns, e.g. frequent lateness, absenteeism, needing to leave work early and spending increased time at work with no explanation
- Changes to productivity and performance
- Changes in the use of phone/email e.g. increase in personal calls, avoiding calls, or strong reaction to calls/texts/email
- Changes in behaviour/demeanour e.g. becoming quiet, anxious, frightened, tearful, aggressive, distracted, depressed, isolating self from colleagues, obsession with time keeping, secretive about home life, worried about children at home
- Visible signs of injury with unlikely explanations
- Change in appearance e.g. change in amount of make-up used, changes in dress, or clothing that doesn't suit the climate
- Partner or ex-partner attending work, or exerting unusual control or demands over work schedule
- Receipt of unwanted gifts, nuisance calls, false allegations of misconduct, unwanted conduct and attention from a colleague or client/patient
- Avoiding a colleague or client/patient or showing discomfort in the work environment around certain people (considering workplace related stalking)

It is important to recognise that an employee may find it difficult to make a disclosure to an employer or colleague. They may be fearful of being judged and they may feel guilt or shame; that the risk to them may increase by disclosing to someone; be fearful that they may be treated differently or unfairly; be fearful of not being believed especially if the perpetrator has longstanding working relationships with colleagues and managers; have concerns about confidentiality; and the perpetrator may also work for the same organisation. It is therefore important to:

- Remain sensitive/non-judgemental/discreet/supportive
- Prioritise safety over work efficiency; reassuring them that the organisation has an understanding of DA, SV and stalking and how this may be impacting them at work
- Allocate time in private to listen
- Not seek proof of the abuse¹⁰
- Not contact the abuser
- Not adopt the role of support worker, but advise of specialist support available and support contact (see section 6)
- Not attempt to diminish the situation or dismiss the concern or fear the victim has shared
- Not attempt to control the situation by encouraging the victim to revoke or minimise the disclosure
- Not discuss any concern of wellbeing or any negative impact the disclosure may have on the alleged perpetrator with the victim
- Provide the victim with a copy of the policy which will be followed

Risk Assessment:

The policy needs to consider the expectations placed on managers to conduct a risk assessment following any disclosure.

The DASH (Domestic Abuse, Stalking and Harassment and Honour Based Violence, 2009) risk assessment is the most commonly used tool to identify risk. Details on how to complete this risk assessment can be found within guidance documents available at: [Support for professionals - Gloucestershire Domestic Abuse Support Service \(GDASS\)](#).

Where high risk is identified, the policy should consider the role managers will play in making appropriate referrals to specialist support organisations. Details on specialist support are provided in section 6.

Completing a risk assessment helps to better understand the current experiences of a staff member and will also identify those members of staff at higher risk who may need the involvement of external agencies to keep them safe.

It may be that your organisation does not expect managers to complete a risk assessment. If this is the case, it is recommended that clear procedures are in place to engage and refer to specialist services so that they can consider the risk and support required.

¹⁰ If the alleged perpetrator works for the same organisation this may be difficult should the need arise for disciplinary action. However, upon initial disclosure and for as long as possible the victim should not be asked for proof of abuse.

Support for staff and safety planning in the work place:

The policy should outline the support options for staff experiencing abuse. The support may be referrals to external specialist support organisations, or may also include options within the workplace to be supportive and help to keep them safe. It is important to note that managers and staff are not expected to manage the risk by themselves, and external specialist services can be contacted to provide support.

Employers/ managers/ staff who become aware of DA, SV and stalking and understand the risks may want to consider:

- Making emergency and safe contact arrangements
- Adjusting responsibilities and workload
- Review communications and IT safety
- Arrange in advance when and who to contact if the employee doesn't come into work (family member/police/neighbour/friend etc.)
- Discuss changes in route to work, location of work base, start and finish time, flexible working and entrance to work (where possible and appropriate)
- Ensure employee records are secure and where necessary ensure other staff are aware not to reveal employees' personal details to anyone or their whereabouts
- Consider (where appropriate and necessary) alerting security or reception staff of the concerns and details of the perpetrator to ensure they are screened from the workplace
- Consider special leave or time off if victim needs to attend court, an appointment to seek support, or supporting arrangements for the victim to leave the abusive relationship (organisations may wish to include provisions within their compassionate leave policy)
- Facilitate contact with specialist support services where necessary and appropriate and offer to jointly work with a specialist to develop a safety plan or provide a safe space within work for the victim to meet with specialist services
- Consider any other support the organisation can offer, including after the victim has left the abusive relationship (if appropriate)

It is important to remember that victims of DA, SV and stalking may be at increased risk of harm in their workplace if they leave an abusive partner, as it may be the only place where they can be located. As such, employers who are aware of DASV and fail to protect their employees from violence at work may be acting against Health and Safety legislation.¹¹

It is also important to remember that some victims may be at risk from another colleague, client or patient. Workplace safety planning may therefore need to consider how the victim can reasonably be kept away from those individuals without alerting their abuser that they may have told somebody. This may include allocating a new worker to a patient/client, or offering new projects or flexible workplace opportunities.

Where the abuser is a colleague, you may wish to grant home working opportunities, a period of leave or a change in work/team for the victim. The section on dealing with perpetrators

¹¹ Domestic violence resource manual for employers, second edition. Refuge and Respect.

below should also be considered; ensuring that the victim's work does not suffer as a result of their disclosure, but that changes to the perpetrator's work are instead considered wherever possible and appropriate.

Support for staff should also include details on how you plan on continuing communication, especially where changes in working practice have been made to support the staff member and where the perpetrator may also be part of the same organisation. The victim should be kept updated and informed of any action being taken by the organisation. Organisations may also want to consider offering the victim support or advocacy outside of their direct line management, especially if the line manager also manages or works closely with the alleged perpetrator.

Expectations placed on line-managers/staff:

Throughout the policy, make the expectations of line managers and other staff clear so they are aware of their required response to DA, SV and stalking, whilst also ensuring a supportive environment for all.

The policy should include the plan for providing appropriate support to managers and staff, some of whom may experience the effects of secondary (or vicarious) trauma, or may even be caught up in the circumstances of the abuse if they are close to the victim, or have received any contact from the perpetrator. Such support may include opportunities for work based counselling, enhanced supervision and some of the safety planning measures also considered for the victim if necessary.

Staff should also be aware that they can seek professional's advice from specialist services such as the GDASS professional's phone line (see section 6).

e) Organisational response to employees who are Perpetrators of DA, SV and Stalking¹²

It is important that organisations set a standard on the behavioural code of conduct they expect from their employees, creating a framework for the overall culture of the organisation. This enables the organisation and employees to feel supported in calling out identified unhealthy behaviours and attitudes even in circumstances where it is unclear if an individual is a perpetrator of abuse; allowing organisations to tackle inappropriate behaviour and create a healthy workplace behavioural culture.

Where direct perpetrator behaviour is identified, the policy should reflect how the organisation intends to respond to employees who are perpetrating DA, SV and stalking; whether the abuse is perpetrated at home or in the workplace.

Employers and staff may become aware that someone in the workplace is perpetrating DA, SV and stalking; this may be through criminal proceedings or conviction, disclosure from the victim, concerns about behaviour raised by a member of staff and disclosure from the perpetrator themselves (who may inform colleagues of their behaviour). Responding to perpetrators of DA, SV and stalking in the workplace is important for organisational reputation and to ensure victims feel safer and supported in the workplace. It is also

¹² Domestic violence resource manual for employers, second edition. Refuge and Respect.

important for perpetrators of abuse to know that their behaviour is not acceptable and will not be tolerated.

All employers have a duty of care towards their employees. This includes perpetrators, who through their actions, are damaging their own lives as well as the lives of others. Engaging with perpetrators of abuse in a positive, respectful way does not mean excusing the abuse and can help to increase safety for the whole family.

Employers and staff may gain awareness of staff perpetrating DA, SV and stalking through:

Indirect disclosure of perpetrating may come to light as a result of:

- A direct allegation to the employer from the victim
- An allegation from a third party e.g. an employee suspects or has witnessed another employee abusing their victim
- Notification by the police or through a criminal records check
- The employee needing to take time off to attend court

Direct disclosure

Some may identify their abusive behaviour directly and ask for help to deal with their behaviour. This is likely to have been prompted by a crisis such as a particularly serious incident, an arrest or an ultimatum from the abused partner/victim.

There may be opportunity to speak to employees sensitively about their behaviour and ask if they are being abusive – for example if there is a decline in performance and concentration or unexpected absences. In these circumstances consider and be mindful to;

- not make the employee feel backed into a corner or expect an early full and honest disclosure about their behaviour; it may be difficult for them to discuss and feel like they can be honest about their behaviour.
- be aware of the barriers for the employee in acknowledging their abuse and seeking help (such as shame, fear of child protection process, self-justifying anger).
- be aware that some – even when they have sought help voluntarily – are unlikely to disclose the seriousness or extent of their abuse, and may try to “explain” or blame it on other people or external factors. Even those who are concerned enough about the abuse to seek help may present with other problems such as alcohol, stress or depression, and may not refer directly to the abuse as the problem.

In these circumstances, organisations may decide that some managers/staff have specialist training to ask these questions, or may ask specialist organisations, such as voluntary perpetrator programmes, to support.

Be alert to the possibility of DA, SV and stalking if you hear the following:

- I need an anger management course¹³
- I’m not handling stress at work
- My partner says I need help

¹³ Gloucestershire Domestic Abuse Local Partnership Board does not advocate for the use of anger management courses for known perpetrators of domestic abuse. For more detail, contact the County DASV Strategic Coordinator.

- My partner and I are fighting a lot
- My partner and I need counselling
- My partner is not coping and is taking it out on me
- The kids are out of control and my partner is not firm enough
- I'm depressed/anxious/stressed/not sleeping/not coping/not myself
- I feel suicidal (or have threatened or attempted suicide)
- I'm worried about my rage at work, in the car, in the street etc.
- Comments about, or behaviour towards another person that appear obsessive or fixated

If any of the above are identified, you may wish to ask indirect questions such as 'how is this affecting your family?', 'when you feel like that, how do you behave?', 'you must be worried about the impact on yourself, partner and family?'.

It is important to note that some perpetrators of abuse may initially make themselves appear to be the victim, so seeking advice from specialist service is recommended.

Non-Disclosure:

It is important to note that some staff may feel uncomfortable disclosing to their employer, but may wish to engage in external support. It is therefore important that organisations ensure information about external support services are readily available in the workplace.

Responding to perpetrators in the workplace:

In identifying abusive behaviour:

- Be clear that abuse is always unacceptable and that it may constitute criminal behaviour
- Be clear that abusive behaviour is a choice
- Be respectful but do not collude
- Be positive: it is possible for perpetrators to change if they recognise that they have a problem and take steps to change their behaviour
- Be clear that you might have to speak to other agencies if there are grounds to breach confidentiality
- Be aware that on some level the perpetrator may be unhappy about their behaviour
- Be aware and tell the perpetrator that children are always negatively affected by living with abuse, whether or not they witness it directly¹⁴
- Be aware, and convey to the perpetrator, that DA, SV and stalking is about a range of behaviours, not just physical violence
- Be aware of the likely costs to the perpetrator of continued abuse (arrest/loss of relationship/impact on children)

Disciplinary Action:

Be aware that acts of DA, SV and stalking can be a criminal offence and lead to caution, arrest, prosecution and criminal conviction. As such employers need to consider what impact legal

¹⁴ Noting that the DA Act 2021 now identified children who are impacted by DA are now to be considered as victims in their own right.

action would have on the workplace especially when it results in restrictive bail conditions, the employee being remanded in custody or if they are given a custodial sentence.

The fact that an employee has been charged with a criminal offence is not in itself sufficient grounds for disciplinary action, including dismissal, unless this is specifically covered by the code of conduct or contract of employment. If a member of staff is perpetrating abuse, employers should consider whether there is a connection between the abusive behaviour and their role at work.

It is also important to note however, that an absence of criminal justice process does not mean that the abuse is not happening. Organisations may therefore wish to review their codes of conduct to respond effectively to perpetrator behaviour outside of criminal proceedings. This may include outlines of specific behaviours that the workplace deems unacceptable or conduct that impacts specifically on the work environment.

The nature of the conduct and the nature of the employee's work:

Where appropriate employers may need to take action to minimise the potential for perpetrators to use their position or work resources to find out details about the whereabouts of their victim. This may include a change of duties or withdrawing access to certain computer programmes, systems, databases etc., or physical records (as appropriate).

If a perpetrator of abuse is using work resources such as the telephone, fax, e-mail or a company car in the course of their perpetrating behaviour, this could be construed as misuse of the organisation's property and contrary to the organisation's code of conduct.

The extent to which the employee's role involves contact with/poses a risk to other employees and the general public:

It may be considered that there is a conflict between the offence and the job the employee is employed to do. In some cases, the fact that an employee is a perpetrator of DA, SV and stalking may make certain duties inappropriate and justify redeployment, disciplinary action or even termination of employment.

Breaking professional codes of conduct:

There may be circumstances in which an employee may be suspended or struck off by their professional body for being a perpetrator of abuse e.g. a social worker, a doctor etc.

The status of the employee:

Consideration will need to be given to whether the actions of the staff member have brought the organisation into disrepute. Such behaviour, whether convicted or not, may be against the aims and values of the organisation. Some employees represent the public face of an organisation and there may be considerable reputational damage to the organisation if an employee is a perpetrator of DA, SV and stalking.

Consider what the impact of the employee's behaviour is on other employees. Such behaviour may be regarded as gross misconduct.

In order to address the points above, start by assessing if the employee's behaviour has had an impact on the employment relationship. To do this, information will need to be gathered to form an opinion and will need to be investigated as appropriate.

When you are considering how to respond to employees perpetrating domestic abuse, it is useful to review what HR policies are already in place and refer to the advice and guidance of HR staff and teams as well as any departments your organisation may have for dealing with the conduct of staff, or professional bodies that may exist.

f) Training

The policy should outline the training to be made available to staff to identify and respond to DA, SV and stalking and the expectations placed on certain staff to attend such training. This should include detail on how organisations will ensure this learning is embedded in practice.

g) Raising awareness in workplace

The policy should outline how the organisation plans on raising awareness amongst staff about identifying DA, SV and stalking, how staff should respond in the workplace and where they can access support. This may include:

- Posters
- Intranet content
- Leaflets
- Bulletins
- Events (for example, running events where staff can learn about DA, SV and stalking)
- Creating staff support groups

4. Guidance on producing a policy for frontline organisations responding to the public who may be victims of DA, SV and Stalking

The below sets out the key areas that should be included in an organisational policy on responding to DA, SV and stalking disclosed through interactions with the public.

This does not provide an exhaustive list of options and policies will need to be specific to individual organisations, in line national and local regulations, and consider expectations of organisational Safeguarding policies and practices. Consideration should be given to an approach that is relevant and proportionate based on the size of the organisation/business and the structures that are in place.

a) Definitions

Outline the areas of DA, SV and stalking that the policy intends to cover and the definitions that the organisation will adopt.

This sets out a common language that organisations can use when dealing with DA, SV and stalking.

b) Organisational commitment

Outline the organisational commitment to tackling DA, SV and stalking and the way in which the public/clients can expect to be dealt with if they are experiencing or perpetrating abuse. This can be a broad statement, or a more detailed outline. This can include that the organisation:

- Takes disclosures seriously and that they will ensure that those at risk are responded to effectively and appropriately.
- Is committed to a multi-agency response to DA, SV and stalking.
- Will promote awareness of DA, SV and stalking and how people can access support.
- Will strive for best practice and will monitor and continue to develop its response to DA, SV and stalking.

Agencies may also wish to add detail into their policy that outlines any mechanisms they have to check and test that the policy is being adhered to and/or an escalation route for staff should they feel the policy is not being implemented in practice.

c) Confidentiality, information sharing and record keeping

Outline of the organisational response to confidentiality when responding to disclosures. This should include the organisational response to:

- Seeking and gaining consent to share information with other parties.
- Legal basis for sharing information without consent with other third parties in cases of;
 - High risk abuse
 - Risk to children
 - Risk to a vulnerable adult
 - A crime having been committed.
- Information sharing agreements with other agencies and processes that the organisation participate in e.g. MARAC (a multi-agency risk assessment conference with representatives from local police, probation, health, child protection, housing practitioners, Independent Domestic Violence Advisors (IDVAs) and other specialists).

This section should also outline record keeping processes for the organisation, including record retention.

d) Creating environments for disclosure

This section outlines how staff ensure members of the public are provided with appropriate opportunities and environments to make safe disclosures of their experiences of DA, SV and stalking.

This may include:

- Displaying posters and leaflets in public areas of local sources of support
- Private spaces where victims can be seen alone
- Outlining ways in which staff can request to see someone alone

- Routine enquiry processes for your organisation
- Outlining how staff can ask appropriate questions when they have identified the signs of possible DA, SV and stalking
- Outlining how staff can ask appropriate questions if they are concerned about the behaviour of a member of the public/client (identifying perpetrator behaviour)
- Identification schemes that allow a victim to highlight to your staff that they wish to be seen alone and asked the question, for example, placing a sticker on samples in doctors surgeries

It is important to note that some tactics may not be included in a publishable document in order to protect victims and to ensure perpetrators are not alerted to organisational practice.

e) Risk assessment

The policy should consider the expectation placed on staff to conduct risk assessments on those who make disclosures of DA, SV and stalking.

The policy should consider:

- The risk assessment tool that you expect your staff to complete (this will likely include the DASH risk assessment and young person's DASH, but the organisation may have other agency specific tools that staff are required to use)
- The circumstances in which a risk assessment should be completed
- How your staff should complete the risk assessment
- The process staff should follow once completed, such as record keeping, onward referral, advice and safety planning.

Guidance on risk assessment can be found within locally produced guidance documents available at www.gdass.org.uk and specialist services detailed in section 6 can also support.

f) Safety Planning

This section should outline options available to staff to help protect the victim of DA, SV and stalking. This will be agency dependant, so may in some circumstances simply include the advice staff can provide to victims, or onward referral to specialist support; or it may include options that can be provided to increase safety, for example, changing locks, providing an alarm etc.

Guidance on safety planning can be found within locally produced guidance documents available at www.gdass.org.uk and specialist services detailed in section 6 can also support.

g) Multi-Agency working and processes

This section outlines any multi-agency or partnership arrangements that are in place for identifying and responding to DA, SV and stalking. This will likely include references to established processes such as MARAC.

The policy will need to outline how participation in such arrangements/processes will occur and how staff can refer into and engage in these processes. Staff should be clear on the expectations placed on them in how they interact with any multi-agency processes and how these processes work.

Guidance on MARAC is available at www.gdass.org.uk

h) Referral to support

The policy should outline the options staff have for onward referral for specialist support for victims and perpetrators of DA, SV and stalking. Section 6 provides detail to support this.

This section should outline:

- What referral options are available
- The process for onward referral
- Action to be taken once referral has been made

i) Training and guidance for staff

The policy should outline the training to be made available to staff to identify and respond to DA, SV and Stalking and the expectations placed on certain staff to attend such training. This should include details on how organisations will ensure this learning is embedded in practice.

The policy should also outline where staff can access further guidance and support in identifying and responding to DA, SV and stalking.

A range of guidance documents to support a range of staff have been produced locally and are available at www.gdass.org.uk.

j) Awareness raising

The policy should outline plans on raising awareness amongst staff about identifying and responding to DA, SV and stalking, and also raising awareness to the public, including how they can expect the organisation to respond. This may include:

- Posters
- Intranet content
- Leaflets
- Social media content
- Website content
- Bulletins
- Events
- Participation in countywide awareness activity

5. Resources for organisations

There are a range of resources that organisations can access to support the development of a DA, SV and stalking policy and guide organisational responses. The below presents some useful links that organisations may want to consider:

Employer's initiative on domestic abuse

A free to join network for all companies and public sector organisations that aims to provide employers with information on how to respond to DA. The network provides a range of resources, network meetings, conferences and will pilot free training for employers.

The network can be accessed online:

<https://eida.org.uk/>

Business in the Community (BITC) Domestic Abuse: a toolkit for employers

This toolkit provides advice and guidance for employers to respond effectively to employees and colleagues affected by domestic abuse.

The toolkit is specific to responding to incidents of intimate partner abuse.

The toolkit can be accessed online:

<https://www.bitc.org.uk/toolkit/domestic-abuse-toolkit/>

Bright Sky Mobile App

Bright Sky is a free and unique mobile app providing comprehensive support and information to people affected by domestic abuse, including a UK-wide directory of specialist support services. It is also a tool for friends, family and professionals seeking to support someone who is a victim. The app is free to download on the Apple App Store and Google Play Store.

Information on the app can be found at:

Hestia: <https://www.hestia.org/brightsky>

Working Without Fear Workshop

A locally developed tailor-made workshop designed to help organisations recognise what domestic abuse and stalking are and their implications as well as help them respond appropriately so that staff are protected.

The programme invites organisations to pledge their support to tackling domestic abuse and stalking in the workplace, offers a range of training workshops for relevant staff and supports the development of an organisational policy.

The programme has been developed by Nick Gazzard of the Hollie Gazzard Trust.

Information about the programme can be found at:

<https://holliegazzard.org/working-without-fear-workshop/>

Local guidance documents

A range of 'identifying and responding to' documents are available for all professionals in Gloucestershire to support them step by step in how they identify, risk assess and safety plan for victims.

The guidance documents can be accessed at: www.gdass.org.uk.

6. Specialist Support Services Nationally and Locally

Local Domestic Abuse Support Services	
<p>Gloucestershire Domestic Abuse Support Service (GDASS) Main DA service for Gloucestershire Support all victims of DA aged 16+, Honour based abuse and DA related stalking -Helpdesk (general advice/access to service) -Floating Support (standard/medium risk support) -IDVA service (high risk support) -Support referrals in to Target Hardening/sanctuary scheme (to secure victims' property) - Support referrals in to Places of Safety (if someone cannot stay in their home)</p>	<p>Helpdesk: 01452 726 570 Professionals: 01452 726 561 Email: support@gdass.org.uk Website: www.gdass.org.uk</p>
<p>STREET STREET is a county-wide service for young people aged 13-19 who: -have experienced or are experiencing teenage relationship abuse; -are adversely affected by domestic abuse in the home either current or historic; -are displaying harmful behaviour in their relationships.</p>	<p>Email: STREETreferrals@victimsupport.org.uk</p>
<p>Positive Relationships Gloucestershire (PRG) Voluntary domestic abuse behaviour change perpetrator programme (for those 18+)</p>	<p>To make a referral either complete the Online Referral Form or call us on 01452 529 866. Help to Change - FearFree</p>
<p>Stroud Beresford Refuge Women's refuge</p>	<p>Tel: 01453 764385 Email: office@beresfordgroup.org</p>
<p>Gloucestershire Stalking Advocacy Service (GSAS) For high risk non-DA stalking</p>	<p>Stalking and harassment - FearFree Contact can also be made via: StalkingClinic@gloucestershire.police.uk</p>
<p>Victim Support General victims' services and support for standard and medium risk non DA stalking</p>	<p>Phone: 0808 281 0112 Out of hours Support line: 08 08 16 89 111</p>
<p>Nelson Trust Women's Centre Trauma-informed, gender responsive service, that provides holistic support for women and their families. Particularly for women with multiple and complex needs.</p>	<p>Gloucester Women's Centre Belsize House, 1 Brunswick Square, Gloucester, GL1 1UG Phone:01452 397690 Email: gloucester.info@nelsontrust.com</p>
<p>Gloucestershire Sexual Assault Referral Centre</p>	<p>Phone: 0300 421 8400</p>

Hope House SARC offers immediate emotional and practical support; as well as medical care, to anyone who has been raped or sexually assaulted They also provide forensic medical examinations	Address: Hope House SARC, Gloucestershire Royal Hospital, Great Western Road GL1 3NN. Website: https://www.hopehouse.nhs.uk/sarc/
Gloucestershire Rape and Sexual Abuse Centre (GRASAC) Provide emotional and practical support to survivors of rape, sexual assault and childhood sexual abuse regardless of gender.	Phone: 01452 305421 Email: info@glosrasac.org.uk
Sexual Violence Counselling Services	www.survivorpathway.org.uk
GARAS Support for those seeking asylum	https://www.garas.org.uk/
Hollie Gazzard Trust Offering training and workshops as well as providing the Hollie Guard Personal Safety App.	Home - Hollie Gazzard Trust
Local Authority Housing (for emergency accommodation)	
Gloucester City Council: 01452 396396 (Emergency out of hours phone : 01414 869 655) Cheltenham: 01242 387615 (Emergency out of hours phone: 0800 4080000) Stroud: 01453 766321 (Emergency out of hours phone: 01453 222 104) Forest of Dean: 01594 810000 (out of hours is same number, option2) Tewksbury: 684 272212 (Emergency out of hours phone: 01684 293 445) Cotswolds: 01285 623000 (out of hours is same number, option2)	
Other Local Safeguarding Services	
Children's Social Care	Phone: 01452 42 65 65 Email: childrenshelpdesk@gloucestershire.gov.uk Out of hours: Call the Emergency Duty Team on 01452 614194 or at edt@gloucestershire.gov.uk
Adult Social Care	Phone: 01452 426 868 Website: http://www.gloucestershire.gov.uk/health-and-social-care/adults-and-older-people/ Out of hours: Call the Emergency Duty Team on 01452 614194 or at edt@gloucestershire.gov.uk
Mental Health Crisis Team	Phone: 0800 169 0398 Option 1 for Stroud and Cotswolds Option 2 for Gloucester and Forest Option 3 for Cheltenham, Tewkesbury and North Cotswolds

	Hearing impaired, please TEXT: 07775510693 – 7am – 9.30pm 07768776863 – 9.30pm – 7am
National Domestic Abuse Services	
National Domestic Abuse Helpline Access to National Refuge Network	The freephone, 24-hour: 0808 2000 247 https://www.nationaldahelpline.org.uk/en
National Stalking Helpline	0808 802 0300
Paladin National Stalking Advocacy Service	https://www.paladinservice.co.uk/
Respect (Help for DA perpetrators)	Freephone 0808 8024040 https://respectphoneline.org.uk/
Karma Nirvana (honour based abuse and forced marriage support)	UK Helpline: 0800 5999 247 https://karmanirvana.org.uk/
IKWRO (support to Middle Eastern, North African and Afghan women and girls living in the UK, who have experienced, or are at risk of all forms of “honour” based abuse, including; forced marriage, child marriage and female genital mutilation (FGM), or domestic abuse)	https://ikwro.org.uk/
GALOP (LGBTQ service)	LGBT+ Domestic Abuse Helpline: 0800 999 5428 https://galop.org.uk/
Men’s advice line	0808 801 0327 info@mensadviceline.org.uk
Southall Black Sisters (support for victims from BAME communities and those with no recourse to public funds)	020 8571 9595 (9:00am and 5:00pm Monday – Friday) info@southallblacksisters.co.uk
Support with civil orders: -Flows: https://www.flows.org.uk -DV Assist: https://dvassist.org.uk -NCDV: https://www.ncdv.org.uk/	