

Consultation Comments & BBC Responses

Bedford Borough Strategy to Address
& Reduce Domestic Abuse 2021 - 2026



Summary

The consultation on the Bedford Borough Strategy to Address and Reduce Domestic Abuse 2021-26 ran from 26 October to 23 November 2021. There were 9 (nine) respondents and their comments are set out below together with the response from Bedford Borough Council.

Respondent 1

Comment 1:

The points in the ‘how will we achieve this’ column of the ‘provision of services in safe accommodation’ theme are really good, but should be extended to all victims of domestic abuse, not just those in ‘relevant’ accommodation schemes, particularly those in council temporary accommodation.

Response:

The advocacy services referred to in the strategy will be for those in temporary accommodation as well. We are planning on recruiting floating support workers to support those transitioning from temporary accommodation into permanent accommodation.

Comment 2:

There is very little mention of how the Strategy fits in with the council’s duties under the Housing Act 1996 as amended by the Domestic Abuse Act 2021. The provision of safe accommodation to those approaching the council for assistance must surely be one of the most, if not the most, important opportunity the council has to respond to Domestic Abuse and will give survivors of abuse a viable way out of their situation.

Response:

The duties referred to in the Domestic Abuse Act 2021 are separate to local authority housing duties under the Housing Act 1996 and Homelessness Act 2002 and do not place a requirement on authorities to provide domestic abuse victims with accommodation. However, local authorities must still comply with their duties under homelessness law in line with the Chapter 8 of the Homelessness code of guidance for local authorities. Therefore this comment will be passed on to Bedford Borough Council Housing Department for their consideration and further discussion.

Comment 3:

The way that location of accommodation is considered by the Housing Department when discharging housing duties should be reviewed. At the moment too much weight is given to the police’s assessment of risk without consideration of the risk of social isolation from moving away from employment and support networks, as well as the individual’s own wishes. The risk assessment framework should be set out to balance these different factors, and agencies should recognise that risk-averse approaches will often leave victims at greater risk if they turn down accommodation offers in different parts of the country.

Response:

This comment will be passed on to Bedford Borough Council Housing Department for their consideration and further discussion.

Comment 4:

At the moment the governance structure outlined on page 16 of the strategy involves many different organisations across diverse sectors, but it is not clear that there is one single point person who is responsible for the council's work in this area. At the moment there are a large number of organisations in the statutory and voluntary sector that provide services in the community but do not have a uniform way of responding to domestic abuse and there is no clear pathway for survivors to access support, particularly for those who do not meet the threshold for MARAC. This means that the support provided will be haphazard depending on which organisation they first approach. A point person would help co-ordinate the support that is available and identify gaps in provision. We also believe there should be a named Councillor appointed to liaise with the council around the domestic abuse services in the borough.

Response:

Bedford Borough Council employs a Senior Officer for Domestic Abuse. It is acknowledged that there are a variety of pathways into receiving Domestic Abuse support, however, it is not possible for one individual to co-ordinate the referral pathways of other organisations. A uniformed response would also not take into account the individual needs of those who are experiencing domestic abuse wanting to access services that are appropriate to their needs. Any approach needs to be victim/survivor led, not organisationally led.

Comment 5:

Para 21.12 of the Homelessness Code of Guidance states that 'Housing authorities should have policies in place to identify and respond to domestic abuse'. Whilst victims of domestic abuse would be dealt with under the Multi-Agency Adult Safeguarding Policy and the Children's Services Procedures Manual, there does not appear to be a specific policy / procedure which focuses on how different service areas should respond to domestic abuse. At the moment it is not clear what the Adult Safeguarding Team does if someone is being abused but does not meet the s.42 criteria or DASH referral criteria.

Response:

There is currently a cross county piece of work being completed by the Children & Adult Safeguarding Boards to review the existing procedures and protocol document which was previously just a Children's Service Document.

Comment 6:

There should be a formal process in place that means that relevant information is shared between the housing department and safeguarding teams so that information about abuse is automatically picked up in the assessments undertaken by the housing department. Housing staff should contact the adult safeguarding team as standard when carrying out s.184 inquiries in case the individual is known to the safeguarding team. Equally the safeguarding team should contact the housing department when safeguarding alerts are raised as various duties under the Housing Act 1996 will often be triggered by the safeguarding alert itself.

Response:

This comment will be passed on to the Domestic Abuse Local Partnership Board for consideration and further discussion.

Comment 7:

The commitment to training on reframing negative language used by professionals which can place blame and responsibility on the non-abusive partner is very welcome.

Response:

Thank you for your positive acknowledgement.

Comment 8:

There should be more detail on how survivor voices will be incorporated into commissioning processes and domestic abuse consultations. When and how often will this be done? How will the council ensure that feedback is obtained from socially excluded groups? Who will be responsible for this? What formats will be used? What happens if the feedback is not positive? The draft strategy states that success will be achieved when positive feedback is obtained in relation to services, but constructive negative feedback would be a sign that the feedback process has been successful and will enable services to improve.

Response:

The finer detail will be through the Action Plan which will sit under the strategy and address these areas of comment.

Comment 9:

It is not clear in the draft strategy who will be responsible for identifying needs for future provision and how this will be tracked. Many of the points in the ‘what will success look like’ could be more specific, measurable and time-bound – how will progress be reviewed to ensure improvements are made as quickly as possible?

Response:

The finer detail will be through the Action Plan which will sit under the strategy and address these areas of comment.

Comment 10:

Information sharing agreements and procedures should be reviewed to ensure they comply with the Data Protection Act, particularly the data minimisation principle. This ensures that data is shared only amongst directly relevant organisations. Victims should have control over how their data is used and therefore need to be able to access privacy notices when disclosing such sensitive information so they understand the scope of the sharing and their rights, including the right of access and the right to object. Many survivors report distress arising from their lack of control over many aspects of their situations. Ensuring that data protection law is followed will help people have more control over their lives and will hopefully lead to an improvement in their wellbeing. A Data Protection Impact Assessment should be carried out by the MARAC if one has not been done already.

Response:

Reviews are currently taking place. It is not always possible for the victim/survivor to have control over how their data is used particularly when domestic abuse is a safeguarding issue and there is a lawful basis for the information to be shared. The Data Protection Act 2018, amendment 85, goes further in empowering organisations to process personal data for safeguarding purposes lawfully, without consent where appropriate.

The new amendment provides a lawful ground for the processing of special category personal data – without consent if the circumstances justify it – where it is in the substantial public interest, and necessary for the purpose of: (i) protecting an individual from neglect or physical, mental or emotional harm; or (ii) protecting the physical, mental or emotional well-being of an individual. Where that individual is: • a child or an adult at risk, • under 18 or, • having needs for care and support, • experiencing or at risk of neglect or any type of harm, • unable to protect themselves.

The amendment still expects the possibility of obtaining consent, unless it would prejudice the safeguarding purpose (i.e. the protection of the individual). The question must be whether the use of the personal data is proportionate to the lawful aim. The law intends any justifiable step to protect individuals at risk to be considered as being in the substantial public interest. (SafeLives)

Comment 11:

Before COVID-19 the Housing Options service often required people to use the phones in the customer service centre which meant it was impossible to provide the required information securely. Services should operate so that personal data is kept secure by default and design, as required by the Data Protection Act 2018.

Response:

This comment will be passed on to Bedford Borough Council Housing & Customer Services for their consideration and further discussion.

Respondent 2

Comment 1:

There is currently a protocol in place that clarifies the basis on which Bedfordshire Police are likely to support a request for a housing transfer, made by a member of the public who might be suffering abuse, to either a Local Authority or a Housing Association. This protocol needs reviewing as from 22nd April 2021 it has been in force for circa 9 years and without it being updated to reflect current legislation and thinking around domestic abuse then, due to the high thresholds or too much confidence being placed on preventative measures that could potentially keep people at risk, a transfer or support from the Police for someone suffering/fleeing abuse is extremely difficult. Therefore, from a housing perspective if Bedford Borough Council is endeavouring to improve its practice around domestic abuse but the Police and the Housing Associations do not follow suit then rehousing people will remain as problematic as it has always been. Please see protocol in its entirety below with concerning areas (amongst others) highlighted:

The purpose of this document is to clarify the basis on which Bedfordshire Police are likely to support a request for a housing transfer, made by a member of the public, to either a local authority (LA), or a housing association (HA).

Bedfordshire Police frequently receive referrals from HAs/LAs in the county, in cases where a transfer is being sought on the grounds of personal safety. Whilst the applicant will often already be in public sector housing, some cases arise in which they may be in a different tenure (such as private sector rented) in which event they may be seeking to be declared homeless, this potentially placing the LA under an obligation to house them.

Regardless of tenure, Bedfordshire Police will base any assessment of alleged risk on information held on internal databases (typically OIS & CMS) and PNC. It is extremely unlikely that a request will be supported in the absence of the applicant, or a member of their household, having been the victim of reported crime, and likely to be at a substantial risk of serious harm, from others, in the event of their not being moved to alternative accommodation.

A transfer will generally only be supported as a last resort, and after potentially more proportionate interventions have been attempted and demonstrably failed. These are likely to include bail conditions, restraining orders and /or civil remedies such as non-molestation orders and occupancy orders. There may be occasions when these are not suitable, such as in the case of a violent offender who is still outstanding.

In cases where a transfer is supported, it is highly probable that this will be subject to the applicant moving well away from the LA area concerned. Alleged offenders, and/or their associates, will typically be routinely active within the locality, and the risk of an applicant's new address becoming known will increase considerably in the absence of an adequate separation distance. The outcome of which will be that the danger is merely re-located to a new address, and the intended purpose of the move will have been undermined. The point being that if the applicant is going to retain the same job/ college/local shops/ social networks etc., simply moving within the locality is unlikely to make her hard to find for long.

Bedfordshire Police have Information Sharing Agreements with all LAs and HAs in the county, which specify a single point of contact (SPOC), in the force's Community Safety department. All consultations for possible transfers are dealt with by the SPOC, and police officers and staff should avoid potentially raising the expectations of members of the public who may wish to seek a transfer. Under no circumstances should a member of the public be given an open-ended letter, apparently supporting a transfer.

Bedfordshire Police will not reflect representations from other organisations in any responses made.

(Source: Bedfordshire Police Freedom of Information response 22/04/2021)

Response:

This statement will be passed on to Bedfordshire Police & Bedford Borough Council Housing for their consideration and further discussion.

Respondent 3

Comment 1:

Provision of Services in Safe Accommodation

Training for key staff in both housing and wider BBC area. - How do we ensure that the training received allows staff in key areas to give consistent and correct advice. Could DA experienced/ trained staff be placed in each team to ensure that social services, housing, adult services teams have a lead for DA who has done more than basic training.

Staff in these roles should be aware of local services- this could be done through the teams engaging in better partnership working with the voluntary sector.

Response:

Under the strategy we are considering the use of specialist domestic abuse advocates within housing and adult services and professionals and victim/survivors will have access to the Bedfordshire Domestic Abuse Partnership (BDAP) Support Services Directory

Comment 2:

I have a concern that training will be provided by generic providers or national organisations and will not reflect the local services.

Response:

Training will be procured through a commissioning process and a specification which will ensure that any training is provided by a specialist domestic abuse service and not a generic provider of training.

Comment 4:

The existing housing for women has little/no wrap around support. This means women are being placed in accommodation that is more likely to see them return to an abusive situation. On site support and help needs to be around the clock to ensure safety.

Women put in inappropriate housing are not understood. Example cases:

- Lady reporting an abusive ex-partner threatening to burn the building down was not reported by the staff member in supported housing for 2 days, and then was not seen as a high risk factor.*
- Vulnerable adult at risk from her ex put in a downstairs room at the front of a building on a main road. Building also had males there including a sex offender.*
- Lady in a local refuge was picked up by her partner from outside the building on a Friday evening and not reported missing till the Monday morning.*
- Lady who was in a local shared house was assaulted by another women in her accommodation and she was made to move. The other lady remained in the original accommodation.*

Response:

This comment and examples will be shared with the Contract Manager in Bedford Borough Council Housing for further consideration and discussion with the relevant housing provider.

Comment 5:

Provision of Services in the Community

Portfolio Holder for DA - currently this sits in children's services. We all know that this is not reflective of the bigger picture of DA as something that effects service users from teenagers to the elderly, people who have chosen not to have children or have had children removed, those who are yet to have children. What picture does this send out to those effected- I would say that it assumes the borough only cares if you have a child/children. Would it be better to have a dedicated portfolio holder for DA that sits between adult and children's services, and feeds in to the specific issues of homelessness in female DA victims. As a note I have been delivering DA services in the borough for in excess of 9 years and have yet to be contacted by the portfolio holder. How does the Portfolio holder reflect the local picture if they do not engage with local services?

Commissioning of services - Will the council approach the incredibly dedicated voluntary sector providers who have spent years building up services that reflect the local community and their knowledge of partner agencies. In the past small organisations like mine have been unable to be commissioned as we are considered a small charity.

Partnership boards that sit need to reflect all the DA services not just the big players.

There is NO victim focussed funding for women's specific services in Bedford provided by the local authority, No locally funded support groups (both Luton and Central provide funding to DA support groups) The OPCC's takes a year-on-year approach and has made real term cuts each year for gender specific victims support, NO statutory service offers funds for core costs but ALL refer in to the services and are surprised if there is a waiting list.

Funding applications for charitable organisations could be supported or match funded by the local authority to help secure bids.

Borough could support the local organisations in securing longer term funding and core funding.

Response:

These comments will be passed onto the Domestic Abuse Partnership Board for consideration and further discussion.

Comment 6:

Justice, Recovery & Ongoing Protection

There is actually very little focus on recovery in this section.

Inclusion training needs to be included to ensure that the Safe & Together model works.

- The difficulty of appearances not being reality is often missed especially in middle class families where masking is commonplace.*
- Women can be found guilty of criminal behaviour but still be victims of coercion through abuse in a relationship.*
- Assumptions of cultural expectations and religious bias being used to explain abusive practices, coercive control and even rape.*
- Is it always clear who the instigator is?*
- What happens when victim's mental health in the relationship has been affected by the trauma and abuse? But perp seems 'stable'*
- We need an understanding that some professionals hold views of a perpetrator, or can be collusive and there should be a good whistle blowing policy to ensure that other professionals can raise this without involving the client.*

Voluntary sector organisations are often not included in the process of child protection, or our input is limited. We are often seeing the client more than other services but we are treated like we are not the experts in our area and that our professional judgement is not as valid as the statutory services.

I am not sure how this policy hopes to increase the woefully inadequate number of cases reaching the criminal justice system without providing for resources for the existing services to support survivors through the court system.

Comment 7:

Early Education and Intervention.

The current programmes in schools rely on teaching staff to educate children. The voluntary sector are happy to advise and support but the schools and colleges don't take us up on this as we cannot do it without resources.

Response:

These comments will be passed onto the Domestic Abuse Partnership Board for consideration and further discussion.

Comment 8:

What about parenting after abuse programmes to support those after abuse (PPP is not suitable).

Response:

This area of work is currently being progressed via a voluntary sector organisation.

Respondent 4

Comment 1:

I make these comments and a survivor of domestic abuse and as a practitioner in the field. Overall, I feel there are too many professionals within this strategy for it to be effective, there isn't in my opinion the working knowledge within any of the 5 key areas of development to successfully make the borough a place where 'Domestic abuse will not be tolerated'. How do so many agencies work together for a common goal? Who is making sure that they do?

Response:

The Local Domestic Abuse Partnership Board will oversee the strategy and sitting underneath this will be an action plan and an operational delivery group which will be made up of local frontline practitioner level staff, specialist domestic abuse agencies and survivors of domestic abuse. They will be responsible for implementing the 5 key priorities through the action plan. No one agency in Bedford Borough alone is responsible for domestic abuse and it is important to work together to achieve a co-ordinated community response to this important area of work.

Comment 2:

Sadly, there is a lack of even basic knowledge across the 5 identified sectors of 'Domestic abuse; and on a deeper level no understanding of how to work with someone who has been traumatised by abuse. Work with survivors of Domestic abuse should be trauma informed with the survivor at the core, frankly this just isn't the case as each service has their own agenda, not a shared common goal.

Response:

The strategy refers to commissioning trauma informed services to support long term recovery as well as crisis work.

Comment 3:

The client fails to be the focus and when all agencies have their own agenda the survivor gets lost in these processes; re-traumatising the client, which sadly often leads to people returning to the abusive situation they were trying so hard to leave. Sometimes a survivor can have upwards of 14 professionals involved in their case! No one agency has overall responsibility for coordinating the support, so it often isn't workable for the survivor and the outcome is less than they deserve.

Response:

Whilst acknowledging that it can be overwhelming and traumatising for a survivor to be working with a variety of partners, where there are multiple professionals involved with one individual, partners need consider which professional would be appropriate to be a key person or main point of contact for the individual and other professionals on a case by case basis to reduce the risk of re-traumatisation.

Comment 4:

I believe that it is necessary to create / identify a portfolio holder for Domestic Abuse in Bedford Borough, to enable the borough to become champions in the field. The portfolio holder would be the key contact for services with overall responsibility for ensuring all services identified in the strategies work in partnership, are trained by experienced DV practitioners, work in a trauma responsive way and are accountable. They would facilitate working forums such as the previously successful 'Complex needs forum'.

Response:

These comments will be passed onto the Domestic Abuse Partnership Board for consideration and further discussion.

Respondent 5

Comment 1:

Reducing suicide and suicide attempts due to domestic violence/abuse.

There is a growing concern about the extent of the connection between suicide and domestic violence/abuse hampered by any systematic collection of data but various reports and research point to there being a number of suicides and attempted suicides linked to the impact of domestic violence and abuse, and that these include the victims of abuse, the perpetrators of violence and abuse as well as witnesses to the abuse (other family members including children).

Samaritans locally have advocated for more support and funding to develop and deliver an awareness programme with sources of support for victims and their families, also for those bereaved by domestic violence or suicide arising from this, and to provide trauma sessions for victims and others impacted. We are currently working with Women's Aid and Mind BLMK in developing initiatives to support those affected by domestic abuse and violence.

I have set out some outcomes from research into the link between domestic violence and suicide but overall I have found that the data is not always available or collated, and the true situation may well be worse than the initial research suggests.

I do not see a specific mention of suicide prevention in the strategy and this should perhaps be included as an aim and work stream.

We are a member of a multi-agency domestic abuse group organised by Central Beds Council and we are happy to be involved in some of the groups mentioned in the Bedford Borough strategy to start to raise awareness among services, carers and families and provide some support pathways for victims, their families or those who have been impacted, and not forgetting that a number of perpetrators also end their lives.

Response:

Suicide prevention, awareness raising and support pathways will be incorporated into a work stream in the action plan and will sit under the objectives of awareness raising and provision of support in the community and we would welcome the involvement of Samaritans Bedford in developing initiatives around this subject area.

Respondent 6

Comment 1:

On page 15 - For the Objective ‘Early Education and Intervention’ do we need to explain in ‘How will we achieve this’ that there will be evidence based and quality assured training provided for primaries and secondary’s?

Response:

Whilst we cannot commit to providing a programme of specific evidenced based and quality assured domestic abuse training to primary and secondary schools, there is a commitment to support schools in ensuring that they have access to training which is available through the Bedfordshire Domestic Abuse Partnership.

Comment 2:

Is there a need for a short Glossary for people who don’t know what single assessment is or the Multi agency risk assessment etc.?

Response:

Thank you for this suggestion, this will be incorporated into the strategy.

Respondent 7

Comment 1:

Bedford Borough Liberal Democrats welcome the publication of a strategy to tackle and help reduce Domestic Abuse in Bedford Borough.

It is right that victims of Domestic Abuse have now statutory protections via the Domestic Abuse Act introduced this year, 2021, with local authorities at the forefront of responsibility in making sure Domestic Abuse victims receive the correct support, help and services.

Domestic Abuse should not be tolerated within Bedford Borough, and the two aims of the strategy are fully supported by Bedford Borough Liberal Democrats to reduce the prevalence of Domestic Abuse and ensure the right support is in place in a timely fashion.

To meet the second priority mentioned in the consultation document – Raising Awareness of Domestic Abuse – Bedford Borough Liberal Democrats would like a directory of current services added to the strategy document – as an appendix – and agreement for the directory to be regularly reviewed at least once a year to keep the directory up to date. Bedford Borough Liberal Democrats feel that this would help achieve the priority in making residents of Bedford Borough know what services they can access and how they can access them if help and support regarding domestic abuse is required.

The fifth priority of Early Education and Intervention is welcome to all of Bedford Borough primary school children. The strategy to provide education and support to children and young people is an important step in helping to reduce Domestic Abuse in Bedford Borough in later years.

The mention of a Whole Housing Approach within the strategy is another welcome step towards Bedford Borough Council moving towards Housing First schemes. It has been evidenced that Whole Housing Approaches can save up to £32,000 (DAHA, Whole Housing Approach – Tracy's Story: Focus on housing first https://www.dahalliance.org.uk/media/11047/tracy_rgb.jpg) by rehoming and supporting a victim of domestic abuse.

Bedford Borough Liberal Democrats would like clarity as part of the consultation process into how the existing Bedfordshire Domestic Abuse Partnership fits in with this proposed strategy. This partnership was and still is across boundaries with Central Bedfordshire – Does the Bedfordshire Domestic Abuse Partnership have a role to play in achieving the objectives set out in the strategy?

The creation of the Local Partnership Board within Bedford Borough confirms that Domestic Abuse is an issue which is cross-directorate within the council and with partners on the Board. Portfolio Holders and Officers of Bedford Borough across directorates will need to work together to ensure the strategy achieves its aims and objectives.

Our recommendations:

- 1. Can a directory of current services for Domestic Abuse victims in Bedford Borough be added to the Strategy and agreement made for this directory to be updated on an annual basis?*

Response:

The BDAP website link will be added into the strategy.

- 2. Does the existing Bedfordshire Domestic Abuse Partnership have a role to play in delivery of this strategy and if so, how?*

Response:

The work with Bedfordshire Domestic Abuse Partnership on joint communications and awareness raising events, such as the annual international 16 Days Campaign will be added into the strategy.

Respondent 8

Comment 1:

May I check that all the work done below was co-produced?

From the beginning did you have Services, funders, employers, employees and especially survivors/Lived experience around a table with equal value, all having a voice, whilst that blank sheet of paper was filled with ideas/information and examples by everyone?

For us to stand any chance of saving women and children's lives from abuse, we need them, and certainly those on the ground running and supporting and helping victims and survivors to be co-producing such vital work.

Thank you for your attention on this matter and I am always happy to chat about how severe the problem is out here!

Response:

Thank you very much for your email and for your interest in the strategy. Bedford Borough Council has worked very closely with SafeLives throughout the process who have conducted surveys for survivors, professionals and perpetrators and also conducted interviews with survivors in order to inform the strategy. We have also worked with partners on the Domestic Abuse Local Partnership Board where we have representation of the voice of the victim/survivor and the child victims. We are working with SafeLives to ensure that going forward we truly incorporate the authentic survivor voice on our board, commissioning cycle and DA projects.

Respondent 9

Comment 1:

I have come across information on Facebook regarding the domestic abuse strategy consultation. I am a media production lecturer at Bedford College and would like to offer our services for any awareness videos you would like to produce. This would go towards our students work experience, or could be done as a project with our HE students.

Obviously it is a sensitive topic and would carefully consider which students to use and would closely supervise any projects we do with you.

Response:

This comment has been responded to via e-mail.

Notes

Finding out more

If you would like further copies, a large-print copy or information about us and our services, please telephone or write to us at our address below.

Për Informacion

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Per Informazione

Informacja

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