

## Gender Based Violence Policy

### Policy Number HR32

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## Contents

1. Introduction .....	3
2. Our Policy .....	3
3. Definition.....	3
4. Principles and Values .....	3
5. Our Policies .....	4
6. Identification.....	5
7. Data Protection .....	5
Appendix 1 – Guidance.....	6
Appendix 2 – External Agencies .....	9
Appendix 3 – Guidance Note for Managers.....	12

## **1. Introduction**

- 1.1 Clyde Valley Group (CVG) has a zero-tolerance approach to instances of gender-based violence also known as Violence Against Women and Girls, in all its forms.
- 1.2 Although gender-based violence is primarily experienced by more women and girls, it also impacts men and boys, and those in the LGBT+ community.
- 1.3 We recognise that gender-based violence is an issue across all of society and we are fully committed to ensuring our workplace is safe for everyone. In addition, CVG seeks to provide a caring and timely response to those who have been impact by gender-based violence. In everything that we do, CVG will consistently send out a strong message that gender-based violence has no place in our organisation or wider society.

## **2. Our Policy**

- 2.1 The policy has been created to promote the welfare of all our people affected by a current or previous experience of gender-based violence (GBV), which includes domestic abuse. Clyde Valley Group recognises that gender-based violence is a serious issue within society which affects many people and will take all practical steps to support all employees who are victims of gender-based violence.
- 2.2 CVG also recognises that other individuals can be exposed to gender-based violence without being abused themselves, e.g., a child witnessing a parent abusing the other parent, could have traumatic effects.
- 2.3 The Scottish Equally Safe Strategy recognises that “violent and abusive behaviour [is] carried out predominantly by men and directed at women and girls precisely because of their gender” and that “such violence cannot be understood... in isolation from the norms, social structure and gender roles within the community, which greatly influence women’s vulnerability to violence.
- 2.4 The purpose of this policy is to support, victim-survivors stay in their homes, prevent homelessness and to support anyone who may be experiencing gender-based violence, regardless of gender, or are affected by gender-based violence committed against someone close to them.
- 2.5 This policy also applies to anyone experiencing domestic abuse including men, lesbian, gay, bisexual, transgender people and gender non-binary people (LGBT+).

## **3. Definition**

- 3.1 The Scottish Government’s definition of gender-based violence describes a range of behaviours that includes: intimidation, harassment, online abuse, intimate image sharing, domestic abuse, physical and emotional abuse, stalking, sexual assault, and murder. The term also includes commercial sexual exploitation and so-called ‘honour based’ violence, including, female genital mutilation, forced marriages and ‘honour’ crimes.

## **4. Principles and Values**

- 4.1 The principles and values of this policy reflect those within CVG which values all employees and recognises its responsibilities in promoting the welfare and safety of all its people ensuring they work in an environment that is safe, promotes equality and dignity at work.
- 4.2 CVG is committed to raising awareness of gender-based violence and will put systems in place that will embed a proactive approach to preventing, where possible and supporting victims. CVG will:

- Take steps to promote equality and reduce the risk of gender-based violence
  - Take action where incidents occur or allegations of abuse are raised and
  - Support individuals who are experiencing or have been impacted by gender-based violence by facilitating access to support and specialist services, where appropriate
  - Supporting victim-survivors to transfer tenancies into their names
  - Making effective use of management transfers so women can make planned moves and avoid homelessness
  - Providing security measures to the home
  - Supporting victim-survivors to access specialist support
  - Supporting victim-survivors to access legal advice and representation
- 4.3 CVG realises that employees who are experiencing gender-based violence may not wish to discuss this, even in strict confidence, with any other employee of the organisation. Therefore, a list of external organisations which can offer support and guidance is provided in Appendix 1, as well as a list of the various internal contacts and supports that are available.
- 4.4 All disclosures of gender-based violence will be treated confidentially, and as far as possible, information will only be shared on a need-to-know basis. The key exception being situations where there is a reason to believe that there may be a risk to the person concerned or to others, including harm to children and vulnerable adults at-risk.
- 4.4 In the event that the direct effects of gender-based violence extend into the workplace e.g., unwelcome visits from an abusive partner, CVG have a duty of care to protect both the abused person and their colleagues. For that reason, a risk assessment may be required and CVG may, depending on the individual circumstances, and appropriate protective measures taken.
- 4.5 CVG will ensure that the Gender Based Violence Policy is widely publicised and made available to all employees.

## **5. Our Policies**

- 5.1. CVG is committed to ensuring and promoting the health and safety of all its employees and has a range of other policies/strategies to support this, including but not limited to:
- Domestic Violence Policy
  - Personal Safety at Work
  - Dignity at Work Policy
  - Equality, Diversity and Inclusion Policy
  - Allocation Policy
  - Anti-Social Behaviour Policy
  - Complaints Policy
  - GDPR Privacy Policy
- 5.2. CVG signed up to the Make a Stand pledge in 2020 which was developed by the Chartered Institute of Housing in partnership with Women's Aid and the Domestic Abuse Housing Alliance. It was created to encourage housing organisations to make a commitment to support people experiencing domestic abuse. As part of CVG's commitment to the pledge all our employees are required to undertake mandatory online domestic abuse training.
- 5.3. Allegations of gender-based violence within CVG will be dealt with under the Disciplinary Policy. The policy outlines the processes to be followed and the rights of

the accused regarding representation and appeal. Appropriate support will be given to both the victim and the accused throughout these processes.

## **6. Identification**

6.1 CVG recognises that it takes courage to disclose experiences of gender-based violence which may include historical, recent and ongoing abuse. Those impacted may be fearful and anxious about making that disclosure. Given the barriers that can make it difficult to disclose, there may be other signs that indicate someone may have been impacted by gender-based violence.

6.2 These can include, but are not limited to:

- There may be obvious effects of physical violence e.g., bruising
- Explanations for injuries/incidents that occur that are 'explained away' by the victim
- Interruptions at work e.g., repeated upsetting calls/texts/emails
- May cry or be very anxious
- Uncharacteristic distraction, problems with concentration
- Poor attendance or presenteeism
- Changes in behaviours
- Depression/suicidal ideation
- Fear of partner/references to anger
- Expresses fear about leaving children home alone with partner
- Appears to be isolated from friends and family
- Needing regular time off for 'appointments'

6.3 It is important not to make assumptions as some of the above indicators may be indicative of other concerns unrelated to abuse. The context within which they occur is therefore an important consideration.

## **7. Data Protection**

7.1 CVG will process any personal data collected in accordance with the Data Protection and Information Policy. Data collected from the point at which the CVG becomes aware of the issue is held securely and accessed by, and disclosed to, individuals only for the purposes of providing the necessary support.

## Appendix 1 – Guidance

### 1. Asking about abuse and responding to disclosure

- 1.1 When there is a suspicion of abuse or responding to a disclosure, it is important to listen to what individuals have to say without rushing to judgement, solutions or taking control away from them. Being empathetic and present with them during this process, to then work collaboratively to provide immediate and/or therapeutic solutions, will ensure those impacted feel listened to and in control of the situation. The foremost priority at all times is the safety, care and support of the person involved.
- 1.2 You should provide a private space, reassure them about confidentiality and advise of the limits of this from the outset. In instances where you pick up on possible signs of abuse, proactively initiate a discussion. Ask non-threatening, open questions, including for example: “how are things at home?” or “how are you feeling generally?” If there is obvious bruising/injuries, then ask direct questions: “I’m worried about you because...” or “I’m concerned about your safety...”
- 1.3 Although some people do not ask about abuse because they are afraid of being intrusive or causing offence, there is evidence that most people experiencing domestic abuse and other forms of gender-based violence wish somebody had asked them about it.
- 1.4 There are 6 steps to help guide your conversation if you receive a disclosure:
  1. **Believe them.** Be kind and reassure them they are not to blame. Confirm you take the matter seriously. Do not ask for proof.
  2. **Explain your role and encourage towards specialist support.** Advise that you are not a trained specialist, but you can listen and provide information and refer for support. The best outcome is they seek specialist support as soon as possible.
  3. **Ask if they feel safe.** Ask them if they are feeling frightened and, if they are, ask what they are afraid of. Early on, let them know you are duty bound to tell someone immediately if they disclose that they, or someone else, is at risk of serious harm. This is to keep them safe.
  4. **Listen actively.** Do not interrupt. Don’t investigate or probe for details; that is not your role. Take brief, factual notes of what was said and do not make assumptions.
  5. **Give them control.** The person making a disclosure needs to be in control and make their own decisions about what happens next. It is not appropriate to offer solutions or advice or to act on their behalf without their full consent unless there is a risk of harm to them or others.
  6. **Safeguarding for under 18s.** If the disclosure is being made by someone over 16 but under 18, you need to pass this disclosure to the People Director for appropriate advice regarding safeguarding procedures. This should ideally be done with the person’s consent.
- 1.5 If you are unable or feel uncomfortable about asking about abuse or responding to a disclosure, it is important that you take steps to refer to somebody else to ensure that the focus is on that person’s immediate safety and health and wellbeing. In addition, if someone chooses not to share information about abuse during a first discussion, you should advise them of this policy and offer support in the future.

## 2. Accessing Support

- 2.1 Anyone experiencing gender-based violence is encouraged to report it immediately to someone that they feel comfortable with who can support them. Employees can access direct support from line managers and/or from Human Resources. For anyone affected by gender-based violence, immediate support can be provided and a prompt referral made to external specialised support services, if necessary. In addition, arrangements can be made to make use of the internal support services including for example, confidential Counselling Service.
- 2.2 CVG will respond sympathetically, confidentially, and effectively to anyone who discloses that they are experiencing gender-based violence.
- 2.3 The matter will be dealt with on a strictly confidential basis and only those with a “need to know” will be made aware of the situation, with the employee’s consent.
- 2.4 Any employee who feels that gender-based violence is having an impact on their emotional well-being can arrange to attend one-to-one counselling sessions. Employees can contact the Employee Counselling Service directly to self-refer.
- 2.5 Individuals who are experiencing gender-based violence may require taking time off work in order to visit solicitors, banks, schools, support agencies etc. This can be accommodated through our policies such as Special Leave. Such arrangements should be made, in confidence, through the employee’s line manager and/or Human Resources.
- 2.6 CVG recognises that individuals who are experiencing gender-based violence may also require to arrange to meet with third parties e.g., support agencies, police etc. for short periods during normal working hours and can accommodate requests from employees to hold such meetings on CVG premises, subject to room availability. Again, such arrangements will be made in strict confidence, through the employee’s line manager and/or Human Resources.
- 2.7 Other support mechanisms available are:
- Consideration of a request for an advance of pay
  - Putting in place specific workplace security arrangements where necessary
  - Information on specialist support and information agencies
  - Advice on flexible working to assist an employee to cope with caring responsibilities; and
  - Paid special leave of up to five days to allow employees to make necessary arrangements.
- 2.8 If an employee is being abused at home but is concerned that they may be at risk of harm whilst in the workplace, their line manager may carry out a risk assessment which could result in some of the following strategies being put in place, for example:
- Reviewing the employee’s work location e.g., removal from front line reception work, where possible, on a temporary basis;
  - Ensuring that the employee does not work alone;
  - Altering working hours for example, starting/finishing times.
- 2.9 There may be instances where both the employee who is experiencing gender-based violence and the abuser are employees of CVG. The line manager will risk assess this

situation to put in place any appropriate measures in discussion with Human Resources. This will also take into account work colleagues who may also feel concerned about their own safety, perhaps through abusive telephone calls or visits from the abuser. Therefore, whether the abuser is an employee or not, they should raise any concerns with their line manager.

2.10 CVG will expect employees to think about what plans you can put in place for emergency situations and perhaps share these with friends or family they can trust. Examples of this may include the following:

- Try to put some money aside for taxis, bus fares, phone calls, even emergency accommodation;
- If possible, carry important documentation such as passport, birth certificates, any benefits books etc. with you;
- In case you have to leave quickly, try and keep some clothes for you and your children at a friend's or family member's house;
- Make sure you have a key to your home. If possible, provide a spare key to a friend;
- Keep a note of useful numbers, i.e., local Women's Aid Group, social work department, many of which are listed in this guide. Make sure you keep these in a safe place.

2.11 Abusive behaviour is the responsibility of the perpetrator. Employees should be aware that misconduct inside and outside of work is viewed seriously, in accordance with the Code of Conduct and the Disciplinary Policy. It can lead to disciplinary action being taken. Employees need to be aware that gender-based violence is a serious matter that can lead to a criminal conviction.

2.12 CVG recognises, however, that it may also be appropriate to support an employee who is seeking help to address their behaviour.



## **Appendix 2 – External Agencies**

Remember if you are in immediate danger, phone 999.

### **Police Scotland**

Police Scotland's purpose is to improve the safety and wellbeing of people, places and communities in Scotland. Their focus is on keeping people safe which is at the heart of everything they do.

W: <https://www.scotland.police.uk/>

T: For emergencies call 999. For non-emergencies call 101.

### **Police Scotland**

#### **Domestic abuse - support and information**

W: <https://www.scotland.police.uk/keep-safe/advice-for-victims-of-crime/domestic-abuse/reporting-domestic-abuse/>

### **Police Scotland**

#### **Victims of crime – support and information**

W: <https://www.scotland.police.uk/keep-safe/advice-for-victims-of-crime/>

### **Victim Support**

Victim Support provides victims with free and confidential emotional and practical assistance about the criminal justice system. Trained volunteers and staff deliver assistance throughout Scotland. There is a Victim Support office in every local authority.

W: <https://www.victimsupportsco.org.uk/>

T: Helpline Mon – Fri 8am - 8pm 0800 160 1985

### **Victim Support South Lanarkshire**

T: 01698 301 111 / 01698 336565

E: [victimsupport.southlanarkshire@victimsupportsco.org.uk](mailto:victimsupport.southlanarkshire@victimsupportsco.org.uk)

### **National Helpline Scotland**

Scottish Domestic Abuse Helpline

T: 0800 027 1234

### **Scottish Women's Aid**

The Women's Aid network supports women, children and young people, who have experienced domestic abuse across Scotland by promoting women and children's rights, providing services and advice to members and ensuring that services are available to women, children and young people with experience of domestic abuse.

W: <https://www.scottishwomensaid.org.uk>

T: 0800 0271234

E: [helpline@sdafmh.org.uk](mailto:helpline@sdafmh.org.uk)

### **Women's Aid South Lanarkshire**

W: <http://www.wasl.org.uk>

T: 0800 027 1234

E: [info@wasler.org.uk](mailto:info@wasler.org.uk)

### **Hemat Gryffe Women's Aid**

The first Asian, Black and Minority Ethnic Women's Group in Scotland. They can provide a whole range of support relating to women, children and young people experiencing domestic abuse.

W: <https://www.hematgryffe.org.uk>

T: 0141 353 0859

### **Shakti Women's Aid**

Provide help for back minority ethnic women, children and young people who are experiencing, or who have experienced domestic abuse.

W: <https://shaktieedinburgh.co.uk>

T: 0131 475 2399

### **Rape Crisis**

Rape Crisis Scotland provides a national rape crisis helpline and email support for anyone affected by sexual violence.

W: <https://www.rapecrisisscotland.org.uk>

T: General Enquiries – 0141 331 4180 Helpline Number – 08088 01 03 02

E: [support@rapecrisisscotland.org.uk](mailto:support@rapecrisisscotland.org.uk)

### **Lanarkshire Rape Crisis Centre**

W: <https://www.lanrcc.org.uk>

T: 01698 872 298

E: [info@lanrcc.org.uk](mailto:info@lanrcc.org.uk)

### **Forced Marriage Unit**

For support and advice if you are trying to stop a forced marriage or need help leaving a marriage you have been forced into.

W: <https://www.gov.uk/guidance/forced-marriage>

T: 020 7008 0151 From overseas: +44 (0)20 7008 0151

E: [fm@fco.gov.uk](mailto:fm@fco.gov.uk)

### **AMIS Abused Men in Scotland**

Provide direct support to men experiencing domestic abuse, as well as helping to improve mainstream service responses and campaigning for further inclusion of male victims in the wider narrative on domestic abuse.

W: <https://abusedmeninscotland.org>

T: 0808 800 0024

### **The Samaritans**

Offer a safe place for you to talk at any time you like, in your way – about whatever's getting to you. They offer confidential, listening and emotional support to those experiencing distress and anxiety.

W: <https://www.samaritans.org>

T: Freephone Helpline – 116 123

E: [jo@samaritans.org](mailto:jo@samaritans.org)

### **LGBT Domestic Abuse Project**

The LGBT Domestic Abuse project works across Scotland to raise awareness of LGBT people's experiences of domestic abuse and improve service responses to LGBT people who experience domestic abuse and other forms of gender-based violence.

W: <https://lgbtdomesticabuse.org.uk/>

E: [info@lgbtyouth.org.uk](mailto:info@lgbtyouth.org.uk)

### **Stonewall Scotland**

Stonewall works with a whole range of agencies to address the needs (including domestic abuse) of lesbians, gay men and bisexuals in the wider

W: <https://www.stonewall.org.uk/>

T: 0131 557 3679

### **Galop LGBT+**

Provide information and support on domestic violence and abuse and the lesbian, gay, bisexual and transgender communities.

W: <http://www.galop.org.uk/>

T: National LGBT Domestic Abuse Helpline – 0800 999 5428

E: [help@galop.org.uk](mailto:help@galop.org.uk)

### **National Stalking Helpline**

This is a national helpline to specialise in providing information and guidance to victims of harassment and stalking as well as their friends and families.

W: <https://www.suzylamplugh.org>

T: Helpline Number – 0808 802 0300

E: [info@stalkinghelpline.org](mailto:info@stalkinghelpline.org)

### **Zero Tolerance ([www.zerotolerance.org.uk](http://www.zerotolerance.org.uk))**

Zero Tolerance is a charity working to tackle the causes of men's violence against women.

### **Breathing Space**

Provide a free, confidential, phone service for anyone in Scotland experiencing low mood, depression or anxiety.

E: <https://www.breathingspace.scot>

T: 0800 83 85 87

### **NHS 24**

NHS 24 provides a co-ordinated, single source of quality assured health and social care information for the people of Scotland.

W: <https://www.nhs24.scot>

T: 111

## **Appendix 3 – Guidance Note for Managers**

### **Asking about Abuse and Responding to Disclosure**

- Creating an environment where team members are aware of this policy and feel able to seek support is important in helping to meet the needs of our people experiencing abuse.
- Remember the 6 steps.
- Although some people are afraid of being intrusive or causing offence, research shows that most people experiencing domestic abuse wish somebody had asked them about it. Should you suspect that a team member / work colleague may have experienced some form of abuse, ask yourself firstly if you feel equipped to deal with the situation. If so:
  - Provide a private space, reassure them about confidentiality and advise of the limits of this at the outset i.e., risk to the safety of others, child protection.
  - In instances when you pick up on possible signs of abuse, proactively initiate a discussion with your team member. Ask non-threatening, open questions – for example: “how are things at home?” or “How are you feeling generally?”
  - If there is obvious bruising/injuries, then ask direct questions: “I’m worried about you because....” or “I’m concerned about your safety.....”
  - Non-disclosure: you should be aware that an employee may choose not to share information about abuse during a first discussion. If this is the case, advise them that you will be available to provide support in the future if required.

### **Responding to a Disclosure of Abuse**

- Be aware of some of the barriers to disclosure for employees e.g., not recognising/wanting to recognise their experience as abusive, fear of bringing shame or dishonour to their family, fear that they might lose their children, belief that the abuse is their fault, concerns about confidentiality.
- Treat them with respect and dignity. Be non-judgemental, supportive and sympathetic.
- Reassure them that the abuse is not their fault, that no-one deserves to be abused and acknowledge it’s not always easy to know what to do.
- Be clear about the parameters of your role i.e., providing information and practical support but not offering opinions or advice or adopting a counselling role.
- Take account of any additional cultural & inequalities needs
- Risk assessment: carry out a workplace risk assessment to minimise any potential risk to team members and colleagues.

### **Good Practice in working with Perpetrators**

- When responding to a direct disclosure from a member of your team or where it has been established that an employee has perpetrated abuse, it is important to adopt good practice when responding.
- Engaging with perpetrators of abuse in a positive, respectful way does not mean excusing the abuse.
- This is an area that requires sensitivity and an awareness of how this might affect the safety and wellbeing of those experiencing the abuse.
- Your response could affect the extent to which perpetrators accept responsibility for their behaviour and, therefore, the need to change.
- Good practice principles to observe include the following:
  - Be aware that some perpetrators, even when they have sought help voluntarily, are unlikely to disclose the seriousness or extent of their abuse and may minimise it or blame it on other factors e.g., alcohol or stress

- 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 aware that on some level, the perpetrator may be unhappy about their behaviour
- Be positive; it is possible for perpetrators to change if they recognise, 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
- Assist the perpetrator to be aware of the likely costs of continued abuse
- Contact the People Director to discuss next steps

## Policy Change History

<b>Version No:</b>	<b>Substantive Change</b>	<b>Author of Change</b>	<b>Approval</b>	<b>Date</b>	<b>Website</b>
1.0	<p>Updated to include reference to the Scottish Equally Safe definition of Gender Based Violence (GBV).</p> <p>Appendix of Guidance rather than inclusion in the main policy for ease of reference.</p> <p>Recommendation to review policy after 3 years rather than 2 to fall in line with other policy reviews. Previously 2 as a new policy.</p>	L Beresford	Board	19/06/23	Yes