



DOMESTIC ABUSE POLICY

JULY 2024

CONTENTS

1. [Introduction](#)
 2. [Purpose](#)
 3. [Scope](#)
 4. [Status](#)
 5. [Policy Owner](#)
 6. [Policy](#)
 - 6.1. [Domestic abuse and the law](#)
 - 6.2. [Forms of domestic abuse](#)
 - 6.3. [Why is domestic abuse a work issue?](#)
 - 6.4. [Who is impacted by domestic abuse?](#)
 - 6.5. [The role of all employees in the efforts to eradicate domestic abuse](#)
 - 6.6. [How to manage domestic abuse at work](#)
 - 6.7. [Recognising the problem](#)
 - 6.8. [Responding appropriately to a disclosure](#)
 - 6.9. [Providing support](#)
 - 6.10. [Referring to the appropriate help](#)
 - 6.11. [Ways of Working \(WOW\) changes](#)
 - 6.12. [Domestic abuse outside of work](#)
 - 6.13. [Confidentiality and safety](#)
 - 6.14. [Aligning the Company's support of victims with that of perpetrators](#)
 - 6.15. [Formal action](#)
 - 6.16. [Awareness](#)
 7. [Further Assistance](#)
- [Appendix 1: External Support](#)

1. INTRODUCTION

- 1.1 Domestic abuse is an important issue for society. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and the effect it has on the lives of those it impacts can be devastating and lifelong.
- 1.2 For employees affected by domestic abuse, this policy affirms the values and behaviours the Company expects of all its employees and the Company's zero tolerance policy on domestic abuse. As a responsible employer, the Company is a member of the Employers' Initiative on Domestic [Abuse](#) and has a dedicated Domestic Abuse page within its well-being pages on [Lighthouse](#). The Company recognises and welcomes the role it has in creating a safe and supportive environment and a culture that prioritises the wellbeing (physical and/or mental) of employees, whilst continuing to exercise its duty of care to its employees.
- 1.3 Domestic abuse is against the law and as such, the Company will make every effort to create a culture wherein the capacity to eradicate domestic abuse from the workplace is maximised.

2. PURPOSE

- 2.1 The purpose of this policy is multifaceted:
- It is directed towards employees for whom domestic abuse is a reality in their daily lives. As such, it is designed to provide a source of information, support and a navigational tool to direct employees to the internal and external support resources available to them.
 - It seeks to provide an insight into domestic abuse for those employees indirectly impacted or those supporting employees who are experiencing domestic abuse, to ensure that they are best equipped to support such situations. In doing so, it highlights that all employees have a role to play in creating a working environment where domestic abuse victims can be supported.
 - It details the Company's commitment - without judgement – to support all those impacted by domestic abuse to the extent that that support is compatible with the Company's Zero tolerance approach and the law.
 - It makes clear that perpetrators of domestic abuse will be dealt with appropriately.

3. SCOPE

- 3.1 This is a group level policy that applies to all workers of Anglian Water Group Limited and its subsidiaries (the "Group"), with the exception of Anglian Water (Ireland) Limited and Wave Limited (and their respective subsidiaries which include Celtic Anglian Water and Anglian Water Business (National)).

4. STATUS

- 4.1 This policy and guidelines are subject to regular review by the Company and are updated as appropriate.

5. POLICY OWNER

5.1 Head of Employee Relations.

6. POLICY

6.1 Domestic abuse and the law

6.1.1 The Domestic Abuse Act 2021, defines domestic abuse as “abusive behaviour by one person to another, where they are both aged 16 or over and they are personally connected. It can be a single incident or a course of conduct. Behaviour is abusive if it consists of any of the following:

- physical or sexual abuse;
- violent or threatening behaviour;
- controlling or coercive behaviour;
- economic abuse; or
- psychological, emotional or other abuse.”

6.2 Forms of domestic abuse

6.2.1 Domestic abuse can take the form of:

- controlling behaviour: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour; and/or
- coercive behaviour: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

6.2.2 This definition includes so called ‘honour’ based violence, female genital mutilation (FGM) and forced marriage. It is clear that victims are not confined to one gender or ethnic group.

6.3 Why is domestic abuse a work issue?

6.3.1 [Research](#) published by the Chartered Institute of Personal Development (CIPD) cites that 75% of those enduring domestic abuse are targeted at work. [Research](#) by the TUC highlights that of those who had experience domestic abuse, over 40% were prevented from getting to work by their abuse, most commonly through physical violence or restraint (72%) followed by threats (68%).

6.3.2 The Company recognises the impact domestic abuse has on victims. All employers have a duty of care to the health, safety and well-being of their employees and the Company is committed to creating this environment - supported by an informed culture - that encourages employees to take ownership for their role in supporting the eradication of domestic abuse in the workplace.

6.4 Who is impacted by domestic abuse?

6.4.1 The circle of people impacted by domestic abuse is often wider than initially perceived. For the purpose of this policy, there are three main groups identified:

- The victim: the individual towards whom the domestic abuse is directed.

- The perpetrator: the individual conducting the domestic abuse.
- Those impacted: work colleagues called upon for support, who may have to witness, listen to or provide support with what can be disturbing cases of domestic abuse.

6.5 The role of all employees in the efforts to eradicate domestic abuse

6.5.1 All employees have a role to play in creating a safe, supportive and confidential environment that seeks to eradicate domestic abuse:

- victims of domestic abuse are encouraged to seek the support they need in the knowledge that they will be believed, supported and their confidentiality and safety maintained wherever possible (see [confidentiality](#));
- perpetrators are encouraged to seek help for themselves and those impacted and ‘do the right thing’, at all times, recognising that their abusive behaviour is their responsibility;
- people managers are expected to create an environment where domestic abuse disclosures (defined as the action of making new or secret information known) are listened to, believed, supported and managed confidentially, making safety provisions as appropriate; they should familiarise themselves with the guidance in this document and other sources, as to how best to do this and if needed, seek support from their Employee Relations Manager or Advisor – contact details can be found [here](#);
- all those involved in supporting domestic abuse disclosures should familiarise themselves with this policy and the support available internally or externally for those impacted so that they can signpost colleagues towards help;
- the Employee Relations Team is responsible for developing a policy and procedures on domestic abuse and facilitating awareness with specific support from the Inclusion Team; in addition, the team is responsible for any formal procedures that may be required; and
- colleagues should be alert and open to the possibility of domestic abuse being a factor in their working environment and be willing and open to support impacted colleagues in a manner that is free of judgement or supposition. This document can help to inform how this can be done.

6.5.2 For all the above, confidentiality is essential (see [confidentiality](#) below). It is also important to note that the victim and perpetrator retain responsibility for progressing their situation. Supporting colleagues (directly or indirectly) cannot assume responsibility for the safety or wellbeing of any employee. Rather, they are responsible for creating an environment where the individual has the best chance of resolving their challenges within their sphere of influence.

6.6 How to manage domestic abuse at work

6.6.1 Employees are not encouraged to actively look for cases of domestic abuse or to draw speculative conclusions in an uninformed way, as to where they think domestic abuse may be taking place. In some cases, there may be a perfectly legitimate explanation for an employee’s behaviour or appearance that may have nothing to do with domestic abuse. An employee’s entitlement to privacy must always be respected.

6.6.2 The following four step framework has been adopted for the benefit of all employees, to provide a clear, simple and structured approach when a suspected (bullet point 1) or disclosed case of domestic abuse is made (bullet points 2-4):

- recognise the problem;
- respond appropriately to a disclosure;

- provide support; and
- refer to the appropriate help.

6.7 Recognising the problem

6.7.1 It is important that victims make every effort to recognise the situation that they are in and this is said in the knowledge of how seemingly impossible this may seem to victims at times. Failure to do so does not mean that they will not receive support, but that it may be delayed, disproportionate and/or reliant on a colleague recognising the signs in front of them.

6.7.2 In some cases, individuals may not recognise that they are victims of abuse or may not use these words to describe their experiences. In the absence of a disclosure, there are sometimes indicators – often subtle rather than overt – which employees should be mindful of when working with victims of domestic abuse. These include but are not limited to:

- sudden changes in behaviour and/or quality of work;
- changes in presentation, e.g. excessive clothing on hot days or heavier than usual make-up; and
- changes in performance.

6.7.3 In the absence of a disclosure individuals who are concerned about a colleague should tread carefully when deciding next steps and may wish to share their concerns privately with their own manager or their Employee Relations Manager/Advisor initially.

6.7.4 Should a colleague be approached with a disclosure or an opportunity arise for the colleague to explore their concerns safely, sensitively and with sufficient tools with the suspected victim, colleagues are encouraged to:

- listen intently – domestic abuse is a highly sensitive area and victims and perpetrators may be seeking a confidant;
- ask open and empathetic questions, e.g. how are you? Is there anything you want to discuss? I have noticed you are not yourself at the moment;
- treat everyone as an individual, without assumption or judgement; and
- be mindful that the environment is safe for the discussion, e.g. an employee working from home may be being listened to or their emails checked by the perpetrator (see Ways of Working [[WOW](#)] below).

6.7.5 If the approached or suspicious employee does not feel comfortable managing the situation, they are encouraged to speak to their manager or their Employee Relations Manager / Advisor.

6.7.6 Perpetrators are encouraged to actively consider their behaviour and to seek support should they have concerns or want support with their behaviour or the challenges they are experiencing. The business is committed to executing its duty of care where it can.

6.8 Responding appropriately to a disclosure

6.8.1 Victims and perpetrators may choose to make a disclosure to any colleague, the person does not need to be in a position of authority. They may only wish to discuss the matter privately

as an initial 'cry for help' and where possible (please see confidentiality below) this should be respected. Alternatively, they may wish to seek support to take action. In these situations, they can expect to:

- receive empathy;
- have their disclosure believed;
- share their disclosure without assumptions or judgement, e.g. the Company recognises it is not just women who experience domestic abuse;
- receive assurance that the Company understands how domestic abuse can impact employees and be signposted to the support available whether internal and/or external; and
- in the event of a victim disclosure, if the alleged perpetrator works in the same business, any records of the discussion or action taken remains private and confidential (see confidentiality below) and any records regarding the disclosure and actions taken are stored safely, with access limited for appropriate parties only.

6.9 Providing support

6.9.1 Once a disclosure is made and the appropriate person to support the victim/perpetrator identified, the victim or the perpetrator should be supported with:

- regular (case by case dependent) check-up discussions, ensuring they are clear on the support available whether they have pursued it or not;
- regular reviews of what support they need from the supporting colleague/Company should this change over time;
- reviews as to safe and reliable communication channels, changing contact details if an employee is being harassed;
- support with short or long-term changes to working arrangements where they can be facilitated;
- flexibility considered with alternative leave arrangements, e.g. they as well as their manager could discuss paid and unpaid leave options as a means of support, in turn with the support of their Employee Relations Manager/Advisor;
- a review of site safety to ensure workplaces cannot be accessed freely;
- where appropriate, discussion as to what colleagues (if any) are to be told and how they should be advised to deal with perpetrators who may call or visit the workplace;
- a review of the safety of leaving and accessing site for the victim;
- discussions regarding any code words, if the victim wishes to discretely make the Company aware that they need help;
- record keeping of incidents and concerns reported; and
- consideration being given to requests for financial support.

6.9.2 All support options should be victim and perpetrator led. When both the victim and perpetrator work for the Company, the safety and wellbeing of the victim should be the priority when considering next steps.

6.10 Referring to the appropriate help

6.10.1 It is important that all parties are clear on their role in the event of a disclosure. Boundaries should be created by all parties. Those making a disclosure should feel that they are making the decision about next steps at all times and managers should not assume responsibility for

an employee's situation, nor should they make decisions or take action without the employee's consent.

6.10.2 A non-exhaustive list of support available can be found in [Appendix 1](#) and all employees are encouraged to use it as appropriate.

6.11 Ways of Working (WOW) changes

6.11.1 Nationally, cases of reported domestic abuse increased during the COVID pandemic due to victims of domestic abuse spending more time at home. As we emerge into the post pandemic WOW world it is accepted that we will take all the positives that working from home has provided, which in relation to domestic abuse, may make the situation worse.

6.11.2 To support victims of domestic abuse, it is important that following disclosures, extra caution is taken to agree safe and effective communication channels and physical signs, or safety words agreed if any employee feels they are in danger.

6.11.3 In the event that an employee suffering domestic abuse would like to discuss alternative working arrangements to working from home, they are encouraged to speak to their manager.

6.12 Domestic abuse outside of work

6.12.1 Employees who are impacted by domestic abuse will be supported regardless of whether that abuse occurs inside or outside of work. The business appetite to execute its duty of care extends beyond working hours and is holistic in its approach.

6.12.2 Any behaviour that is at odds with the Company's values and behaviours or is executed in Company time and/or using Company equipment will be viewed in accordance with the Company's Disciplinary policy. Where it can, the Company will make every effort to work alongside those impacted and any authorities investigating the alleged behaviour.

6.13 Confidentiality and safety

6.13.1 Employees making a disclosure will be supported and their views respected if they wish for their information to remain private and confidential. The supporting employee/manager is responsible for ensuring this information is not disclosed to colleagues and all employees who are privy to disclosures or suspect domestic abuse are clear on their responsibilities in relation to confidentiality. This may be particularly important for members of the LGBT+ community, where individuals might not have disclosed their sexual orientation and/or gender identity to their work colleagues. If information is disclosed against the wishes of the employee, this could compound any harm caused by the abuse and have a detrimental effect on future disclosure from other employees.

6.13.2 It is important to note that the Company and employees may not be able to maintain confidentiality in the event that the health, safety and wellbeing of an employee or minors is called into question. Consideration should be given to:

- What are the immediate risks or needs of the perpetrator, victim and their children? Is the supporting Manager equipped to help in this scenario?
- How to proceed having regard for everyone's safety?

- Does the accused worker present any type of risk to other employees, clients and other third parties?
- Is the accused worker facing a police investigation or court proceedings?
- What is the job being performed by the alleged perpetrator? Are they working with young people, e.g. apprentices or work experience candidates? Are they suitable to remain in that role?

6.14 Aligning the Company's support of victims with that of perpetrators

6.14.1 The Company is required and wishes to execute its duty of care to employees and as such, no judgement or assumptions should be made in relation to a suspected or disclosed case of domestic abuse on the part of the perpetrator. This approach is in no way at odds with the Company's zero tolerance approach to domestic abuse.

6.14.2 Whilst every effort will be made to support perpetrators, this approach runs parallel to the recognition that domestic abuse in or outside of the Company, which is against the law, will be taken very seriously and may lead to disciplinary action.

6.14.3 The rationale behind this approach is to ensure that in the case of alleged or suspected abuse, the opportunity for a full, thorough, and impartial investigation is facilitated. Furthermore, it means that, whilst controversial for some, the Company exercises its duty of care, if only to create a more holistic approach to the resolution of domestic abuse.

6.15 Formal action

6.15.1 It is important to be transparent about the possible consequences of confirmed cases of domestic abuse by employees, whether they have been raised by the victim or perpetrator. Domestic abuse is against the law as well as the values and behaviours of the Company. Perpetrators should retain full responsibility for their behaviour at all times. As such, cases of domestic abuse may be dealt with in accordance with the Company's [Disciplinary Policy](#).

6.15.2 At all times, employees should be viewed and supported with empathy, non-judgement, and an open-minded approach. However, in the event that a disciplinary finds domestic abuse has taken place (inside or out of work), this may constitute Gross Misconduct and may result in disciplinary action up to and including dismissal.

6.15.3 Equally, if any claims of domestic abuse are found to be vexatious or malicious, these will be considered and dealt with in accordance with the Company's Disciplinary Policy.

6.16 Awareness

6.16.1 The Company has created a [Domestic Abuse](#) page under Life and Wellbeing on Lighthouse. Our efforts to educate, promote awareness and provide support will continue to evolve and will be communicated via tools such as this. We welcome input from employees to help develop how we can best support those impacted in the workplace.

7. **FURTHER ASSISTANCE**

7.1 Should an employee require further advice regarding this policy, support can be sought from their manager, [Union Representative](#), the [Employment Relations Team](#), a member of the

[Inclusion Team](#) or the Company's independent Employee Assistance Programme (EAP), which is available 24 hours a day, 7 days a week. They can be contacted on freephone **01480 323323 (option 4)** and further details are available on [Lighthouse](#).

LAST REVIEWED

July 2024

Appendix 1 – External Support**National Centre for Domestic Violence**

[Domestic Violence & Abuse · Emergency Injunction Service \(ncdv.org.uk\)](https://www.ncdv.org.uk) [Domestic Violence & Abuse · Emergency Injunction Service \(ncdv.org.uk\)](https://www.ncdv.org.uk)

Call: 0800 9702070

Text: NCDV to 6077

Email: office@ncdv.org.uk

National Domestic Abuse Helpline

[0808 2000 247](https://www.ndah.org.uk) (England)

NSPCC (if you are worried about a child)

help@nspcc.org.uk

[0808 800 5000](https://www.nspcc.org.uk) (Mon-Fri, 8am to 10pm and Sat-Sun, 9am-6pm)

Respect Helpline

[0808 802 4040](https://www.respect.org.uk) (for male victims and perpetrators who want to change)

Rights of Women

[020 7251 6577](https://www.rightsofwomen.org.uk) (family law advice)

[020 7251 8887](https://www.rightsofwomen.org.uk) (criminal law advice)

[020 7490 7689](https://www.rightsofwomen.org.uk) (immigration and asylum law advice)

Samaritans

[116 123](https://www.samaritans.org)

Suzy Lamplugh Trust

[0808 802 0300](https://www.slamplughtrust.org.uk) (National Stalking Helpline)

Victim Support

[0808 1689 111](https://www.victimsupport.org.uk)

UK Government

[Domestic Abuse – How to Get Help](https://www.gov.uk/government/collections/domestic-abuse-how-to-get-help)

Employers' Initiative

[Toolkit for Employers](https://www.employersinitiative.org.uk)

Women's Aid

[chat.womensaid.org.uk](https://www.womensaid.org.uk)

helpline@womensaid.org.uk

SafeLives

[Ending Domestic Abuse](https://www.safe-lives.org.uk)

[Surviving Economic Abuse](https://www.survivingeconomicabuse.org.uk)

Surviving Economic Abuse (SEA) is the only UK charity dedicated to raising awareness of economic abuse and transforming responses to it.

Citizens Advice

Citizens Advice provide support and guidance on domestic abuse. See [here](#).

Refuge

<https://www.refuge.org.uk/>

Mankind

<http://www.mankind.org.uk/>