

STANDING TOGETHER AGAINST DOMESTIC ABUSE

# Developing an Effective Sanctuary Scheme

GUIDANCE FOR HOUSING AND  
DOMESTIC ABUSE SERVICES



**STANDING  
TOGETHER**  
against domestic abuse

May 2023

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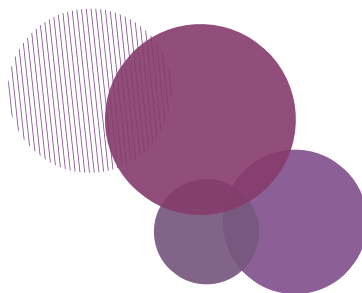
# About this guidance

This guidance is developed by the [Whole Housing Approach \(WHA\)](#) programme at [Standing Together Against Domestic Abuse \(STADA\)](#) for local authorities, housing providers, and domestic abuse services looking to develop an effective Sanctuary Scheme. This guidance provides an operational overview of developing and delivering a local Sanctuary Scheme.

This guidance will support organisations to:

- Gain an understanding of how to develop an effective Sanctuary Scheme.
- The role of housing providers, domestic abuse services, and contractors in delivering an effective Sanctuary Scheme.
- Safely and effectively respond to complex cases.
- Make Sanctuary accessible in the Private Rented Sector (PRS).
- Understand the important role of a Sanctuary Working Group in creating a Coordinated Community Response (CCR)

Sanctuary Schemes are one of many support and safe accommodation provisions recommended through a wider Whole Housing Approach to domestic abuse. The Whole Housing Approach is a framework for how local authorities can provide victims/survivors of domestic abuse with a range of safe accommodation and support options across all tenure types and housing circumstances, and in direct response to victims/survivors' individual needs and wishes. Critically, this includes options to stay safe within their own homes and maintain secure tenancies or home ownership, or to safely access alternative safe accommodation and support. For more information about a Whole Housing Approach, please view our [Whole Housing Approach toolkit](#).



# What is a Sanctuary Scheme

The Sanctuary Scheme is a victim/survivor centred initiative which aims to enable households at risk of domestic abuse to remain in their own homes (if it is safe and their choice) and reduce repeat victimisation through the provision of enhanced security measures (Sanctuary) and support. Part 4 of the Domestic Abuse Act 2021 introduced a new duty on tier one local authorities to provide support within safe accommodation for victims of domestic abuse, including children. [The Department for Levelling Up, Housing and Communities \(DLUHC\) Guidance](#) on the implementation of Part 4 recommends Sanctuary Scheme as a best practice approach to fulfilling Part 4 duties, among a range of support options for survivors which meets their individual housing and support needs which can be offered through a Whole Housing Approach.

The Sanctuary Scheme includes a range of security measures dependent on the needs of the victim/survivor and the existing security standards of the property. For example, one property may need fencing around the perimeter of a property, while another may need additional locks, or some may require a Sanctuary Room fitted inside the property.

***The security measures offered should be reasonable, practical, necessary, and appropriate according to the safety needs of the individual victim/survivors and the conditions of the property.***

As a minimum, the security measures applied must meet recognised British Standards and comply with the means of escape based on fire safety requirements. The Police and Fire and Rescue Service have outlined their recommended minimum security and fire safety measures for Sanctuary Schemes in the [Secured by Design Sanctuary Scheme Installation Manual](#). The British Standard security measures recommended in the Secured by Design Manual have been tested to resist a given amount of force, delaying entry in the first instance, and where a Sanctuary Safe Room is installed, buying the victim/survivor time to get into it.

For an effective Sanctuary Scheme, local authorities must consider the security measures offered, the budget allocated, the risks outlined requiring for the Sanctuary Scheme, and the partner agencies who should be involved. We also encourage the operational leads in neighbouring local authorities to come together to monitor and review each scheme to deliver consistency in quality, best practice and eradicate a postcode lottery for victim/survivors.

The core principles of a Sanctuary Scheme are:

**Safe and suitable** – it is a victim/survivor-led initiative that prioritises the safety needs of all members in the household. A suitability assessment is carried out by the sanctuary contractors to inform decisions around the safe installation of the scheme. Security delivery partners must meet standards outlined within the [Sanctuary Scheme Installation Manual](#).

**Effective** – It is a multi-agency initiative, delivered by domestic abuse-informed agencies and professionals, offered as part of a wider safety and support package. There is a minimum set of security and fire safety measures, which qualifies the scheme as a Sanctuary Scheme. Ideally this is in line with the police and fire and rescue service preferred security and fire measures (see the SBD Sanctuary Scheme Installation Manual). At a minimum, security measures used must meet British Standards. Victim/survivors are happy with the service and identify feeling safer because of having the Sanctuary Scheme installed.

**Accessible** – it is available across all tenure types (social, private ownership and private rented) and risk levels (standard, medium and high), has multiple access points for referral (not just the local authority or the police) and is independent, meaning that it does not require engagement with other services (i.e. reporting a crime to the police/uptake of a referral to the local specialist domestic abuse service (although in some instances they may be delivering the Sanctuary Scheme)).

**Efficient** – the delivery model, referral pathways, processes and resources adopted promote the quickest response possible. Victim/survivors ideally have a single point of contact throughout the service. Resources are allocated so that they reach the maximum number of victims/survivors.

For more information, please refer to our [Sanctuary Scheme Toolkit](#)

# The Model in Hammersmith & Fulham

STADA coordinates the Sanctuary Scheme with Hammersmith & Fulham (H&F). This is done through a Coordinator who is employed to lead the Sanctuary project delivery, ensuring sanctuary is effectively delivered by our partners. The model in H&F covers all risk levels and housing tenure types if the victim/survivor is residing in the borough. The Coordinator is responsible for:

- Overseeing the referral process which includes assessing referrals using a trauma-informed and victim/survivor-centred approach and determining whether the referral meets the Sanctuary Scheme criteria.
- Liaising with referrers to communicate the outcome of the referral and determine how victim/survivors can be best supported by the scheme in conjunction with other interventions and support.
- Processing referrals within an adequate timeframe.
- Providing domestic abuse informed guidance and support to referring agencies where there is uncertainty in making a referral and to remove any barriers preventing access to the Sanctuary Scheme.
- Working with multi agency partners involved in all stages of Sanctuary provision to embed an effective CCR
- Reviewing and approving sanctuary recommendations made by the security contractor and responding to queries that may arise.
- Liaising with the council where recommendations made are not within the scope of the scheme and where necessary, build a case for approval of such works.
- Effectively monitoring the expenditure against the budget, and evaluate the effectiveness of the scheme, including gathering feedback with victim/survivors and referring agencies, to ensure continuous improvement.
- Promote the scheme locally and ensure victim/survivors from marginalized communities can access the scheme, for example, through promoting the Sanctuary Scheme with local specialist by and for services.

The role of coordinating Sanctuary includes both practical day to day operations as well as providing risk assessment and safety planning support where required. For example, some victim/survivors will be supported by a domestic abuse service, engaged with an Independent Domestic Violence Advocate (IDVA) who will undertake these responsibilities. However, there will be some complex cases where further risk assessments and safety planning is required around the actual Sanctuary installation. This is why it is essential that Coordinators have knowledge and expertise around domestic abuse.

It is important to stress that the Sanctuary Coordinator does not take the place of the domestic abuse service. Their responsibility is to provide specific specialist support around the target hardening element of the victim/survivor's case.



# Local Authority Funding and Commissioning

The London borough of Hammersmith & Fulham (H&F) has been commissioning STADA to coordinate the Sanctuary Scheme since 2012. The funding ensures there is a Coordinator in post and Sanctuary installation can be adequately funded. In Hammersmith and Fulham, £16,000 is provided for sanctuary installation costs and additional funding is provided for a part-time Coordinator post.

The cost for each Sanctuary Scheme installation varies according to the victim/survivor's safety needs and the conditions of the property. A standard Sanctuary can cost anywhere between £160 to £1,200, whilst an enhanced Sanctuary, with the inclusion of a Safe Room, can cost £2,000 to £4000 on average.

This should be viewed in terms of costs saved to local authorities for preventing homelessness, including for example, the costs associated with conducting a homelessness assessment and rehousing victim/survivors including children.

Sanctuary Scheme budgets should include costs associated with:

- Core services associated with the scheme including costs related to the coordination, service delivery, property survey and security installation
- Provision of both standard and enhanced security measures
- Coordinator training and development
- Transport costs for the Sanctuary installers

The table below demonstrates how sanctuary scheme funding has been utilised:

Year	Total number of homes secured	Total cost for the year	Average cost per home	Total spent one enhanced installations
2022/23	36	£15,917.72	£442.13	£2786.40 (safe room for 1 property)
2021/22	34	£16,261	£478.26	£4604.16 (fencing for 2 properties)

The table below is an overview of costs for different types of sanctuary schemes installations in 2022/23. This highlights the bespoke service provided as per individual assessments of the victim/survivor’s safety needs and the conditions of the property:

Property secured	Products supplied and fitted	Total cost per property
Property 1	Back door: 1x Euro key and key cylinder adjust unreliable lock.	£150.00
Property 2	Front door: 1x Rim cylinder, 1x Euro key and turn deadlock 1x Door chain 1x Birmingham bar 1x Set of hinge bolts 1x Letter box cowl  Back door: 1x Euro key and key  Window: 4x Sash stops	£428.40

Table continued:

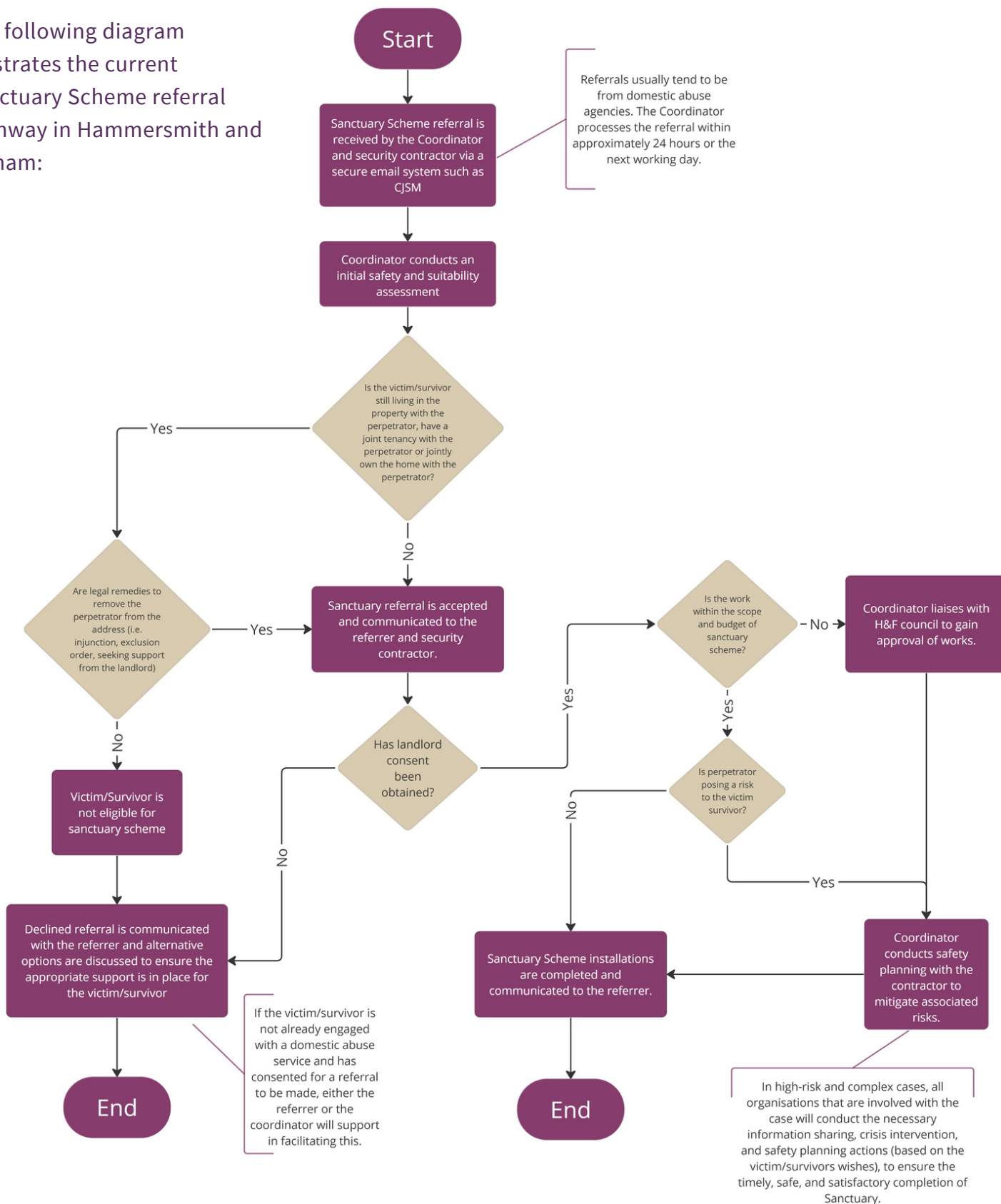
Property secured	Products supplied and fitted	Total cost per property
Property 3	<p>Inner door:            1x British Standard night latch            1x British standard deadlock with thumb turn cylinder            1x London bar            1x Birmingham bar</p> <p>Rear door:            2x Key operated locking bolts</p>	£536.28
Property 4	<p>Front door            2x Birmingham Bars            1x Set of hinge bolts            1x door chain            1x Fireproof letter bag</p> <p>Rear door            2x SK116 door bolts            1x Set of hinge bolts</p> <p>Bedroom:            2x Euro key and turn deadlocks            1x Set of hinge bolts            2x Birmingham bar</p>	£1003.20

Table continued on next page:

Property secured	Products supplied and fitted	Total cost per property
Property 5	<p>Safe Room (lower bedroom):  1x Solid core door hardwood edged  3x Fire rated hinges  2x Euro key and turn deadlocks  1x Latch with a handle set  2x Birmingham bars</p> <p>Front Door  1x British standard deadlocking night latch  1x British standard euro key and turn deadlock  1x Set of hinge bolts  1x Re-enforcing strip</p> <p>Basement Door:  1x Euro deadlock with euro key and turn with clamp plates  1x Set of hinge bolts</p> <p>Windows throughout  10x Sash stops</p> <p>Backdoor leading to garden  2x Lockable press bolts</p> <p>Metal gate  Perspex gate internally  Euro deadlock with keyless egress</p>	£2786.40

# Sanctuary Scheme Referral Pathway

The following diagram illustrates the current Sanctuary Scheme referral pathway in Hammersmith and Fulham:



# Case Study

Below is an example highlighting the process involved when supporting a complex case:

The victim/survivor had a history of abuse against them by their intimate partner. In a recent domestic abuse incident, the perpetrator used a weapon, and a warrant has been issued for the arrest of the perpetrator. The perpetrator had been turning up outside the property repeatedly and had previously been found hiding inside the property.

This case was heard at the MARAC (Multi-Agency Risk Assessment Conference) and the Sanctuary referral was made by the Police/MARAC Safeguarding Lead. An urgent Sanctuary Scheme installation had been requested due to the on-going risks to the victim/survivor. The Whole Housing Approach Coordinator took the following actions:

**Information Sharing** – Through utilising the Sanctuary Scheme Information Sharing Protocols, the Whole Housing Approach Coordinator was able to understand and evaluate the current risks. This was used to effectively safeguard the victim/survivor and the sanctuary provider from the perpetrator.

**Risk Assessment** – The Whole Housing Approach Coordinator obtained further information from the MARAC Safeguarding Lead regarding:

- The last date when the perpetrator had turned up at the client's property.
- The risk of violence towards other persons.
- What steps are being taken by the Police to locate the perpetrator.

Through acquiring this information, a potential risk to the sanctuary provider when attending the property to install Sanctuary, has been identified.

**Safety Planning** – A safety plan has been agreed for the Whole Housing Approach Coordinator to contact the Police (non-emergency) on the installation day ahead of the contractor's time of arrival. The Whole Housing Approach Coordinator raised a request for a Police unit to attend and conduct a search inside the property, to ensure the property is safe for the sanctuary provider to enter and start the installation works.

**Outcome:** Following extensive checks and effective partnership working, the Sanctuary installation was conducted as planned and completed satisfactorily. The Sanctuary provider was now able to work safely, and any potential risks were reduced.

# Sanctuary in the Private Rented Sector (PRS)

Local Sanctuary schemes should be offered to victims/survivors of domestic abuse in any tenure type, including those living in the Private Rented Sector (PRS). There are different considerations that should be taken into account when offering Sanctuary in the PRS, including landlord consent/approval, and fears from victims/survivors of unfair evictions or other outcomes when sharing experiences of domestic abuse with their landlord.

Many PRS landlords want to support their tenants to have safe and secure homes, and do provide consent for Sanctuary to be installed at their property and are satisfied that their tenant is receiving support from relevant agencies. However, some landlords may be reluctant or outright refuse to have sanctuary installed despite there being many benefits in accepting Sanctuary Scheme. Some of the benefits for PRS landlords include:

- Ensuring safety within the home for victims/survivors who are their tenants and therefore preventing abuse from a perpetrator.
- Ensuring tenants who are victim/survivors are receiving support from a specialist domestic abuse service.
- Enhanced security measures can add value to the property and enable them to meet security and safety requirements.
- Minimising the risk of damage to the property or perceived Anti-Social Behaviour (ASB).

In Hammersmith and Fulham, in instances where PRS landlords are reluctant to install Sanctuary provision, an offer of sanctuary removal once the victim/survivor has left the tenancy can be agreed. This can reassure landlords they recognise the measures are temporary and will not impact them financially. Additionally, it is advisable to provide landlords with a Sanctuary information sheet to advise landlords on what Sanctuary is and what is expected of them.

## Addressing Sanctuary Scheme challenges in the PRS

Common challenges in installing sanctuary scheme in the PRS include:

- Reluctance from landlords to install security measures in communal areas which are outside the scope of Sanctuary. Many private landlords would only own the flat, so they would need to discuss changes to communal areas with the block management company or whoever provides that service. It might be complicated to achieve so it is important to manage expectations with the victim/survivor from the beginning around this.
- Potential delays with installing Sanctuary at the property if consent must be sought through a management agency rather than directly from the landlord. This process can often take time as a list of recommended works has to be sent to the agent, who then must forward this to the landlord to consider, who then passes on consent through the agent. Any delays must be considered by the Sanctuary Coordinator and communicated clearly to the referrer and victim/survivor. Conversations should take place where delays are not an option, for example, where an urgent installation or emergency works are required in high-risk and even some medium risk cases. In these cases, it is recommended that alternative options are explored with the victim/survivor and the referrer. An option can be to consider emergency accommodation until sanctuary can be installed.
- Disrepair issues within the property which may prevent the installation of some security equipment. For example, if the front door is in poor condition, measures such as a lock change and new hinges will not make the property secure, and a new door would be required. Therefore, landlords should be encouraged to address and resolve disrepairs in a timely manner prior to sanctuary installation, and the impact of this should be addressed. Any delays due to disrepairs need to be considered by all parties involved and alternative options for the victim/survivor's safety should be explored. This can include housing within emergency accommodation until Sanctuary can be effectively installed.
- The victim/survivor is worried about risking their tenancy or being told to leave the property if the landlord finds out about the domestic abuse. In these cases, the coordinator or the referrer should have a conversation with the victim/survivor directly to try to find out why they have these concerns, understand the relationship with the landlord and explore ways in which Sanctuary can be introduced to the landlord that will not place the tenancy at risk. This must be victim/survivor led so that they feel confident about the process. Have a conversation with the referrer to find out more information and ask them to support with this scenario. For these instances, it can be beneficial to have an information sharing protocol in place on how to communicate with PRS landlords.
- The landlord has declined consent for sanctuary scheme, despite risks relating to the perpetrator gaining access. In this instance, if a PRS property does not comply with the Housing Act under the Hazard Rating System, Hazard Rating 12 entry by intruders, local authority Environmental Health

team can be contacted. This lets the landlord know the property has been identified as vulnerable for residential burglary and if the works cannot be carried out through the discretionary route, there is enforcement that the local authority can take if they receive a complaint about the concerns of security at the property. You would require the victim/survivor's consent before proceeding with this. In this case, the whole building and not just individual flats will be looked at. Implications for PRS landlords under the Housing Act are far reaching because there's other households to consider. In addition to sanctuary, there are other target hardening projects for victims of crime, of residential burglary and residential burglary hotspots so, another approach is to inform the landlord this area is subjected to ASB and get the target hardening work done through another route without divulging that the tenant is a victim/survivor of domestic abuse.

- The landlord has declined consent for sanctuary. In these cases, the Coordinator should work in partnership with the survivor, the referrer, and the local authority housing options team to explore other safety and support options.

## **PRS Landlord Consent**

Lock changes:

Tenants have a right to change their lock without their landlord's consent if they feel unsafe or threatened by their landlord's behaviour, for example if their landlord harasses them or frequently visits the property without warning. Tenants can also change their lock if they need to act quickly, for example if they lost the keys and need to get back in their property and their landlord is not responding.

However, a Sanctuary Scheme provider does not have the right to change the tenant's lock without the landlord's consent. A lock change is a part of the range of measures offered by Sanctuary however this often includes further safety installations works that are required to make a front door more secure for example, the installation of a London/Birmingham bar, locking bolts and points, a fireproof letterbox. Given these measures involve work carried out to the structure and exterior of the property which includes external doors and windows, landlord consent is required. Another example is where the Sanctuary works require drilling again, this is deemed as structural work therefore requiring landlord consent.

Tenancy agreements usually stipulate that tenants do not have the right to make substantial changes to the property without their landlord's consent, so if a tenant changes their locks, it is advisable to keep the old locks and put them back at the end of the tenancy to prevent a tenancy breach.

It is important that private tenants carefully consider their relationship with their landlord before changing locks themselves as there is limited protection against Section 21 evictions which landlords can use. Shelter provides advice for private tenants on how to deal with evictions [here](#).

# Sanctuary for Joint Tenancies and Joint Home Ownership

The Sanctuary Scheme is only appropriate if the perpetrator is no longer residing in the property. If the perpetrator is still residing in the property against the victim/survivor's wishes, they should be referred/signposted to a domestic abuse service for advice and support to consider legal options, including a potential Occupation Order.

If a perpetrator is named as a sole or joint tenant on the tenancy or mortgage agreement, but is not residing in the property, they still have legal rights to access the property unless legal measures are in place. Steps can be taken to support the victim/survivor with making a court application for an Occupation Order or a landlord can take steps to evict the perpetrator to transfer the tenancy into the victim/survivor's name only, prior to security measures being installed by the Sanctuary Scheme. If this is not possible and perpetrator remains a joint tenant, Sanctuary cannot be installed. Victim/survivors should be referred/signposted to a domestic abuse service for advice and support with applying for an Occupation Order.

Without a court order a perpetrator who is a joint tenant or owner can have equal access to the property. This means that some security measures are restricted due to the perpetrator's legal rights to occupy the property. In this scenario, carrying out a lock change would not be possible as it would deprive the perpetrator of access to the property.

# Sanctuary in Social Housing

In instances where a referral is made for a social housing tenant, it is useful to contact the housing provider first. Many social housing providers, such as housing associations may have their own internal sanctuary provision which can be utilised to keep the victim/survivors safe. The list of works provided may be more extensive and sanctuary works could be installed quicker with in-house contractors.

Local Authority sanctuary coordinators can also work with housing associations as a source of funding for the local scheme. Housing associations could potentially contribute per number of residences where works are installed. Where possible, its important that victims/survivors are not subject to a 'postcode' lottery of who their housing providers are to determine the type of Sanctuary scheme support that is provided. Therefore, collaboration between the Sanctuary Coordinator and the local social housing providers is necessary, and the below explained Sanctuary Scheme Working Group is space to do this.



# Sanctuary Scheme Working Group

As part of STADA's Sanctuary Scheme work, the Whole Housing Approach Coordinator leads the Sanctuary Scheme Working Group within the Bi-Borough and H&F. The group is part of a wider CCR response to domestic abuse achieved through coordination. It brings together leads from organisations who provide support services to victim/survivors in some capacity. This support can be around housing, domestic abuse or providing safety and security. Members of the working group include housing providers, homelessness organisations, Violence Against Women and Girls (VAWG) services including specialist 'by and for' agencies, the Police as well as other local specialist services involved with the scheme. The group provides an opportunity to review their respective delivery models and operational processes in relation to sanctuary.

The group has been meeting since early 2019 and share updates on operations for each scheme. Another aspect of the group is to develop vital resources and guidance on sanctuary scheme delivery and this has included working together to develop the [Sanctuary Scheme toolkit](#), part of the [Whole Housing Approach](#) to domestic abuse.

This group provides a forum to share updates on each local Sanctuary Scheme (which may be offered separately by social housing providers), share best practice and review the sanctuary scheme toolkit, with a view of influencing other local areas with implementing new schemes or making enhancements to existing schemes.

## Creating a Sanctuary Scheme Working Group

In the Bi-Borough and H&F, STADA's Whole Housing Approach Coordinator oversees the Sanctuary Scheme Working Group. The responsibilities of the Coordinator include:

- Acting as a main point of contact for working group members, local authority stakeholders, housing associations and domestic abuse services.
- Working with the local VAWG services including specialist by and for services to understand the experiences of victim/survivors who are provided Sanctuary Scheme and provide feedback to the group.
- Utilising meeting data to map and evaluate current sanctuary provision across the membership. The coordinator can identify both best practice and gaps across the differing services and formulate discussion in the meeting and troubleshoot arising issues.

- Planning and preparing for the working group and ensuring actions are completed satisfactorily and to deadline.
- Working with the group to review the minimum standards, and work together to produce relevant resources and guidance in relation to sanctuary scheme.
- Identifying guest speakers from organisations to deliver presentations or relevant training to the group.
- Overseeing the wider governance of the group and review its progress frequently.

To successfully develop a Sanctuary Scheme Working Group in your local area, the key initial considerations are:

### **1. Identifying the group membership**

Identify relevant stakeholders to be members of the group. This should include:

- Local authority housing management teams
- Housing Associations
- Homelessness organisations
- VAWG services including the lead domestic abuse service
- Specialist community led services
- Relevant Police teams such as Designing Out Crime Officers (DOCO)
- Relevant Multi-Agency Risk Assessment (MARAC) representatives

Members should be the strategic lead contact for their service and a deputy should be in place if the lead cannot attend. Deputies attending the meeting should be of an equivalent level, as decisions will need to be made on behalf of their services.

Once the group membership is identified, create a mailing list containing details of all members, adding in new members as and when identified and ensuring the list is kept up to date. Consider asking partner agencies to support with this by sharing relevant contacts.

### **2. Developing relevant governance documents**

Relevant documents must be created as part of the governance for the meeting. The main documents needed for an effective Sanctuary Working Group are:

#### **Terms of Reference (TOR)**

The Terms of Reference (TOR) should clearly outline the membership, principles, purpose and aims of the Sanctuary Scheme Working Group, and how these aims will be met and the roles and responsibilities of group members.

The TOR should outline the groups commitment to anti-racism and consolidate the VAWG Anti-Racism Charter (ARC) This should be used to implement meaningful anti-racist practice, to ensure intersectionality at all stages and to inform discussions within the group. All members should be sent a copy of the ARC ahead of the first meeting.

To find out more please visit:

- [Charter: Anti-Racism Working Group call to action](#)
- [Safety Across Faith and Ethnic \(SAFE\) Communities project - Impact Report](#)

### **Data sharing template**

Members will be expected to share quarterly data. To do this effectively, a monitoring template should be given to members and should be sent to the group Coordinator ahead of the meeting or be presented during the meeting. Data to capture includes:

- Number of referrals
- Number of properties secured through Sanctuary Scheme
- Types of Sanctuary installed
- Demographic data of victim/survivors to identify gaps in support
- Cost of sanctuary per quarter
- Emerging trends or issues
- Areas of best practice

### **Action planning template**

To monitor progress of the Sanctuary Scheme Working Group and record key milestones, it is recommended the Coordinator develops a yearly action plan template. This should be completed with members in the first meeting. This action plan will enable the Coordinator to track progress of their identified deliverables. The action plan can be a live document which is shared with members and enable them to input completed actions. The action plan should be in line with the local authority VAWG Strategy.

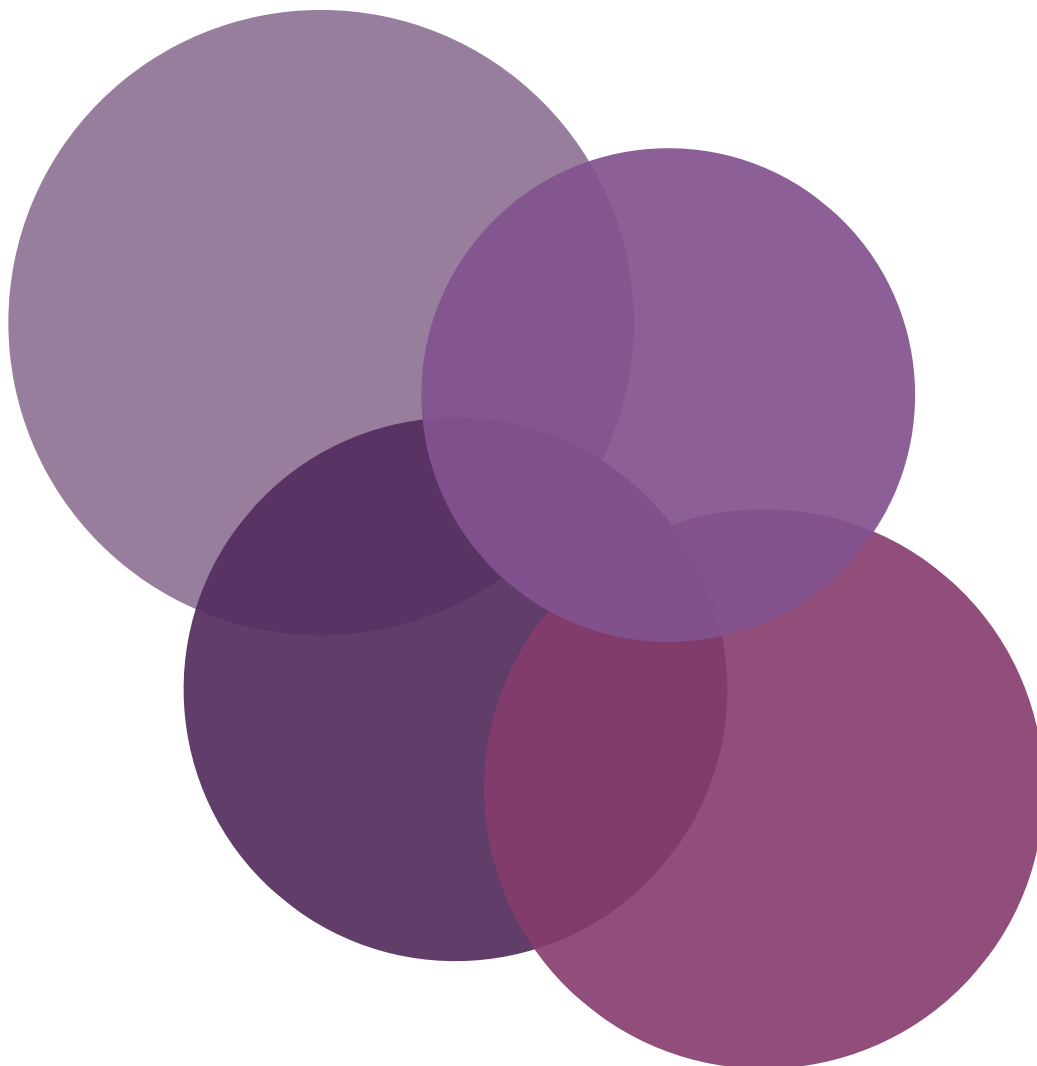
### **3. Frequency of Meetings**

It is recommended that Sanctuary Scheme Working Group meetings are held on a quarterly basis with meeting papers sent to group members at least one week prior.

### **Benefits of the Sanctuary Scheme Working Group**

The Sanctuary Scheme Working Group provides a forum to discuss current provision, encourage best practice, and ultimately improve local Sanctuary Scheme provision. Sanctuary Scheme providers and partners can share best practice, training and learning from other services. The working group provides a framework and set of standards within the CCR approach, for how organisations can

effectively support victims/survivors through the Sanctuary Scheme. Through this framework, organisations can ensure a consistent local approach and eradicate the postcode lottery many victim/survivors experience in relation to safety.



# Frequently Asked Questions

## 1. Can Sanctuary be installed if the perpetrator still has contact with the victim/survivor?

Yes. For example, in instances when the perpetrator may have contact with the victim/survivor, such as through legal contact with their children, sanctuary can be installed, if the perpetrator is not entering the property. Where children are involved, it is important to review the perpetrator's access to them as children may unwittingly let them into the property. The property can then become a place the victim/survivor cannot escape due to the added security measures. This is especially important when installing a Sanctuary Safe Room.

## 2. Can surveillance cameras, such as Ring doorbells be installed outside of a property as part of the Sanctuary Scheme offer?

Due to data protection laws, surveillance camera's outside should not be installed as part of the Sanctuary Scheme offer. If a victim/survivor wants video surveillance, it will be their responsibility to purchase and install this. The installation of items such as surveillance cameras often require ongoing monitoring and maintenance, so are typically not used by Sanctuary Schemes. Furthermore, sanctuary installers must consider [General Data Protection Regulation \(GDPR\)](#) and the [Data Protection Act 2018](#).

The use of recording equipment, such as CCTV or smart door bells, to capture video or sound recordings outside the user's property boundary is not a breach of data protection law. People should try to point their CCTV cameras away from their neighbours' homes and gardens, shared spaces, or public streets.

When people capture images and audio recordings outside of their property boundary, they should consider how intrusive this activity is. They should consider whether they can point their cameras elsewhere or, if possible, apply filters or privacy blocks. In these circumstances, data protection law also requires them to follow certain rules – although these are difficult to enforce.

In the UK, the use of Ring doorbells and other surveillance cameras is governed by GDPR and the Data Protection Act 2018. Under these regulations, individuals must be informed that they are being recorded and the purpose of the recording. The processing of personal data captured by Ring doorbells must be done in a way that is transparent, fair, and lawful. The data must also be processed securely and not kept for any longer than is necessary.

Individuals captured on Ring doorbell footage have the right to access their personal data, have it corrected if it is inaccurate, and to request that it be erased. The [Information Commissioner's Office \(ICO\)](#) is responsible for enforcing these regulations and can take enforcement action if necessary.

In addition, the use of Ring doorbells and other surveillance cameras may be subject to the UK's human rights laws, including the right to respect for private and family life under the [European Convention on Human Rights](#). When using Ring doorbells for commercial purposes, such as by landlords or businesses, there are additional regulations and requirements under the GDPR and Data Protection Act that must be considered.

One of the key requirements is the need to provide clear and concise information to individuals who are captured on the Ring doorbell footage, including the identity of the controller of the data, the purpose of the data processing, and the legal basis for processing the data.

Under GDPR, businesses using Ring doorbells for commercial purposes must also ensure that they have a lawful basis for processing the data, such as obtaining consent from individuals, or demonstrating that the processing is necessary for a legitimate interest. Businesses must also take steps to ensure that the data captured by Ring doorbells is securely stored and not misused, and that individuals have the right to access, rectify, and erase their personal data.

It is important to note that businesses must also provide individuals with a clear and accessible mechanism for making a complaint or seeking redress in relation to the processing of their personal data.

Failure to comply with these regulations can result in significant penalties and reputational damage for businesses. It is therefore important that landlords and businesses using Ring doorbells for commercial purposes seek legal advice to ensure that they are compliant with all relevant regulations and requirements.



# Useful Resources

- **Sanctuary Scheme Toolkit**

This toolkit is a guide for commissioners, operational managers, domestic abuse practitioners and/or coordinators, security installers and any other stakeholders involved in funding and delivering a local Sanctuary Scheme.

[https://www.dahalliance.org.uk/media/10661/15\\_wha-sanctuary-scheme.pdf](https://www.dahalliance.org.uk/media/10661/15_wha-sanctuary-scheme.pdf)

- **What is the Whole Housing Approach (WHA)?**

This provides an overview of the Whole Housing Approach (WHA) as well as its missions and aims.

<https://www.dahalliance.org.uk/who-we-are/whole-housing-approach/what-is-the-whole-housing-approach/>

- **Whole Housing Approach (WHA) Year 2 Report**

This guide provides our findings from the second year of running the Whole Housing Approach (WHA).

[https://www.dahalliance.org.uk/media/11066/whole-housing-project-report\\_year-two\\_final.pdf](https://www.dahalliance.org.uk/media/11066/whole-housing-project-report_year-two_final.pdf)

- **Domestic Abuse Housing Alliance (DAHA)**

This will provide with you a range of information about the Domestic Abuse Housing Alliance (DAHA) accreditation and membership.

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

- **Coordinated Community Response**

This provides an overview of the Coordinated Community Response (CCR) as well as our wider CCR Network.

<https://www.standingtogether.org.uk/what-is-ccr>

- **Anti-racism charter**

This charter for calls for end to unequal partnerships where unhealthy power dynamics operate creating inequality for Black and minoritised women and how to do this.

[https://www.endingracisminvawg.org/ARWG\\_Call\\_to\\_Action.pdf](https://www.endingracisminvawg.org/ARWG_Call_to_Action.pdf)

- **Safety Across Faith and Ethnic (SAFE) Communities project - Impact Report**

This report presents findings from The Safety Across Faith and Ethnic (SAFE) Communities project, which builds the capacity of voluntary and informal networks within faith and Black and Minoritised Communities to respond to domestic abuse and VAWG safely and appropriately.

<https://www.standingtogether.org.uk/blog-3/blog-post-title-one-g9jmw>



# Glossary of Terms

## **ARC – Anti-Racism Charter**

The Anti-Racism Charter was formed by the Anti-Racism Working Group to address racism in the VAWG sector. The Charter calls for end to unequal partnerships where unhealthy power dynamics operate creating inequality for Black and minoritised women.

## **CCR – Coordinated Community Response**

The Coordinated Community Response brings services together to ensure local systems truly keep survivors safe, hold abusers to account, and prevent domestic abuse.

## **DA – Domestic Abuse**

Domestic Abuse is as an incident or pattern of incidents of controlling, coercive, threatening, degrading and violent behaviour, including sexual violence, in the majority of cases by a partner or ex-partner, but also by a family member or carer.

## **DAHA – Domestic Abuse Housing Alliance**

The Domestic Abuse Housing Alliance's (DAHA) working with housing providers to improve the housing sector's response to domestic abuse through the introduction and adoption of an established set of standards and an accreditation process.

## **HOG – Housing Operational Group**

The Domestic Abuse and Housing Operational Group (HOG) brings together local agencies in one forum to address domestic abuse within and between different housing sectors.

## **TOR - Terms of Reference**

The Terms of Reference (TOR) is an agreed document which sets out the working arrangements for a network or forum and outlines the purpose and commitments of this.

## **V/S – Victim/Survivor**

Victim/Survivor refers to the individual who is being subjected to domestic abuse. We know that different individuals have different language preferences. We have chosen the words victim/survivor for consistency, but we respect how individuals want to be identified.

## **VAWG – Violence Against Women & Girls**

Violence Against Women & Girls (VAWG) is defined by the United Nations Declaration (1993) on the Elimination of Violence Against Women: “Any act of gender-based violence that results in, or is likely to result in, physical, sexual or psychological harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life”

## **WHA – Whole Housing Approach**

The Whole Housing Approach (WHA) is a framework for addressing the housing and safety needs of victim/survivors in a local area. It brings together under one umbrella all the main housing tenure types alongside the housing options and support initiatives needed to help people experiencing domestic abuse to either maintain or access safe and stable housing.

