

Employment Matters Committee

30 April 2026

Domestic Abuse Workplace Policy

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Summary

This report seeks approval for a revised Domestic Abuse Workplace Policy for Medway Council. The policy modernises definitions and scope in line with the Domestic Abuse Act 2021, strengthens support for employees (including the introduction of trained Domestic Abuse Champions), clarifies manager responsibilities and safeguarding routes, and formalises the Council's approach to alleged perpetrators who are Council employees.

1. Recommendations

1.1. The Committee is asked to:

- 1.1.1. approve Option A and adopt the revised Domestic Abuse Workplace Policy at Appendix A (and its appendices, Appendix B-E) for immediate implementation;
- 1.1.2. note the key improvements in scope, legal alignment, support arrangements and perpetrator-management protocols, as set out in the Summary of Changes at Appendix F to the report; and
- 1.1.3. agree the provision of targeted communications and training for managers and Champions to support consistent uptake, led by the Council's Public Health team.

2. Budget and policy framework

- 2.1. The decision aligns with the Council's policy framework and supports the One Medway Council Plan by providing employees with a modern, supportive and legally compliant working environment.
- 2.2. There are no significant direct budgetary implications anticipated. Some one-off activity (manager training, policy revisions and comms) will be delivered within existing budgets. Any impact from increased uptake will be managed through workforce planning and local resourcing.

3. Background

- 3.1. The revised policy replaces a narrower, employee-only approach with a broader scope (employees, elected officials, contractors and service users; schools excluded), aligns definitions with the [Domestic Abuse Act 2021](#) (including economic abuse and children as victims), and embeds a support model using trained Domestic Abuse Champions alongside manager responsibilities. It also codifies workplace safety adaptations (hours, location, entry routes, check-ins) and sets out a structured approach to perpetrator management, including where both parties are Council employees.
- 3.2. The revised policy also strengthens data protection and privacy commitments (GDPR/DPA 2018), signposts internal and external support (including Optima Health), and clarifies safeguarding escalation (e.g., consultation with the Duty Manager via 01634 334466 for Medway).
- 3.3. The policy has been developed in partnership with Domestic Abuse specialists in the Council's Public Health team, using the latest available research and best practice nationwide. Prevalence data and local context in the policy underline organisational need and the importance of a clear, trauma-informed response.
- 3.4. Furthermore, the revised policy also contains the latest support mechanisms both locally and nationwide in the attached appendices. The current Domestic Abuse Workplace Policy contains outdated information. Providing updates to these resources are vital for safety and support of employees of the Council.
- 3.5. The Public Health team are the subject experts in this area, and where there is a need to make minor amendments as best practice is updated or new support can be signposted, there is an existing constitutional delegation to the Chief Operating Officer which can be used:

'6.31 Personnel

To agree minor changes to HR policies provided such changes:

- a) do not impact on a current condition of term of employment, process or entitlement;
- b) relate to an existing HR policy designated by the Employment Matters Committee as being within the scope of this delegation;
- c) have not been referred to the Committee for determination by a trade union, the Chairperson or the Opposition Spokesperson of the Employment Matters Committee.'

Making such minor amendments as and when they come up, ensures strong continuity of support for staff.

4. Options

4.1. Option A: Approve the revised policy (recommended).

- Advantages: Clear legal alignment; improved support and safety; consistent manager practice; clearer handling where an alleged perpetrator is an employee; enhanced data protection and signposting.
- Disadvantages: Time investment for training, communications and local Champion arrangements.

4.2. Option B: Do not approve the revised policy.

- Advantages: Avoids short-term change activity.
- Disadvantages: Retains outdated scope/definitions and weaker support pathways; risks inconsistent handling of safeguarding and perpetrator issues; weaker assurance on record-keeping, outdated support mechanisms remain, risking victims' access.

5. Advice and analysis

5.1. The policy provides a clear, survivor-centred and legally aligned framework; recognises children as victims; and strengthens practical workplace adaptations and safeguarding routes. The creation of Domestic Abuse Champions supports early, informed signposting and consistent practice.

5.2. The equality statement has been strengthened to reflect a wider set of characteristics and inclusion commitments. Appendix G to the report is a Diversity Impact Assessment (DIA) which has been undertaken.

5.3. To summarise, no negative equality impacts have been identified. The reforms are expected to positively advance equality. They also recognise children and young people as victims, improving safeguarding responses. The changes particularly benefit groups disproportionately affected by domestic abuse, such as women, disabled people, LGBTQ+ individuals, those who are pregnant or on maternity leave, and low-income employees. However, it continues to reinforce the principle that anyone can be a victim.

6. Risk management

Risk	Description	Action to avoid or mitigate risk	Risk rating
Inconsistent uptake by managers.	Variable awareness could lead to uneven support, safeguarding delays or confidentiality errors.	Communications plan; manager briefing; Champion network; HR advisory support.	C II

Risk	Description	Action to avoid or mitigate risk	Risk rating
Data protection breach.	Poor record handling of sensitive disclosures.	Clear GDPR/DPA 2018 guidance in policy; store minimal necessary data securely; manager training. Public Health also to provide Employee Relations team with training on handling.	D II
Perpetrator management gaps.	Lack of clarity where alleged perpetrator is an employee could expose staff to harm.	Explicit protocols in policy; ability to adjust duties/access; HR and security liaison.	C II

For risk rating, please refer to the following table:

Likelihood	Impact:
A Very likely	I Catastrophic
B Likely	II Major
C Unlikely	III Moderate
D Rare	IV Minor

7. Consultation

- 7.1. The policy was shared with Trade Unions on 18 March 2026.
- 7.2. Feedback was sought and received from the Employee Relations Team, including senior management.
- 7.3. Staff forums and interest groups have been engaged, and feedback has been received and implemented as appropriate.
- 7.4. This paper requests delegated authority for minor tweaks following any further feedback from stakeholders and best practice updates informed by experts in the Public Health team as needed.

8. Climate change implications

- 8.1. There are no climate change implications regarding this report and policy.

9. Financial implications

- 9.1. No direct financial implications are anticipated from this report and policy. Training and communications will be met from existing budgets. Potential benefits include reduced absence/turnover related to domestic abuse and greater productivity through timely support and workplace adaptations.

10. Legal implications

- 10.1. The policy aligns with the Domestic Abuse Act 2021 (definitions, recognition of children as victims, inclusion of economic abuse) and sets out the Council's duties under Health and Safety at Work etc. Act 1974 and data protection law (GDPR/DPA 2018). Managers are guided to escalate safeguarding concerns appropriately.
- 10.2. Where allegations involve Council employees as perpetrators, matters may be addressed under the Disciplinary Procedure, with operational safeguards (e.g., restricting access, changing duties) to protect colleagues and service users.

Lead officer contact

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Appendices

Appendix A: Domestic Abuse Workplace Policy
Appendix B: Domestic Abuse Workplace Policy Appendix 1
Appendix C: Domestic Abuse Workplace Policy Appendix 2
Appendix D: Domestic Abuse Workplace Policy Appendix 3
Appendix E: Domestic Abuse Workplace Policy Appendix 4
Appendix F: Summary of Key Changes
Appendix G: Diversity Impact Assessment

Background papers

None