

Customer Access Review – Full Assessment

Assessment details	
Assessment area	Sanctuary Scheme Referral Procedure
Date of assessment	October 2025
Directorate and Service	Housing and Public Protection, Housing Services
Manager	Housing Solutions and Private Sector Manager / Tenancy Services Manager
Officer conducting assessment	Senior Housing Policy & Performance Officer
Step 1: Scoping the assessment	
1. What are the aims and objectives of the activity or proposal?	<p>The Sanctuary Scheme Referral Procedure outlines the process that agencies can use to make a referral into Dartford Borough Council's Sanctuary Scheme.</p> <p>The Sanctuary Scheme is a victim centred initiative which aims to make it possible for victims and survivors of domestic abuse to remain in their own homes, where it is safe for them to do so, where it is their choice, and where the perpetrator does not live in the property. This is done by providing additional security to the person's property or perimeter.</p> <p>The objectives of the Sanctuary Scheme are to:</p> <ul style="list-style-type: none"> • To prevent homelessness by providing additional security measures to victims and survivors of domestic abuse; • To increase choice for people experiencing domestic abuse who are at risk of homelessness; • To enable people to remain in their own homes and feel safe; • To reduce repeat victimisation and the fear of attack; • To enable people to keep in touch with many of the "protective" factors in their lives such as family, friends, social networks, GPs and schools. <p>The Sanctuary Scheme Referral Procedure has been reviewed to ensure it remains up to date, and this Customer Access Review has been carried out in conjunction with the review.</p>

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Step 1: Scoping the assessment	
2. Who will be affected by the activity or proposal?	<p>The Sanctuary Scheme is tenure neutral and is therefore available to any person living in the Borough in any tenure including, Dartford Borough Council tenants, housing association tenants, private rented sector tenants, and owner-occupiers.</p>
3. How does the activity or proposal contribute to: a) any key performance indicators? b) policies, values or objectives of Dartford Borough Council?	<p>a) The Sanctuary Scheme Referral Procedure contributes towards the following key performance indicators:</p> <ul style="list-style-type: none"> • Corporate Plan: S3 - Number of domestic abuse incidents (Source: Kent Police) • Housing Service Update Report: HPI-15 - Number of households where homelessness was prevented (Source: DBC Housing Service) <p>b) The Sanctuary Scheme Referral Procedure contributes to the Corporate Plan 2024-2027 objectives to:</p> <ul style="list-style-type: none"> • Reduce crime and disorder including violence against women and children • Relieve homelessness in our town, work to eradicate the causes of it and end rough sleeping • Provide a high quality and responsive housing service that's built on respect for aspiring and existing tenants. We want to be practical, honest and straightforward in all the information and advice we give <p>The Sanctuary Scheme also contributes to the delivery of the priorities within the Homelessness and Rough Sleeping Strategy 2024-2029; the Domestic Abuse Housing Strategy 2024-2027; and the Housing Strategy 2025-2028.</p>
4. Which aspects of the activity or proposal are dictated by legislation/regulation and where do we have discretion in how they are delivered?	<p>The Sanctuary Scheme is one of a range of options used by the Council to prevent homelessness.</p> <p>The duties of local housing authorities to provide assistance to people who are threatened with homelessness or are already homeless, are set out in Part 7 of the Housing Act 1996, as amended by the Homelessness Act 2002 and the Homelessness (Priority Need for Accommodation) (England) Order 2002.</p> <p>The Homelessness Reduction Act 2017 significantly reformed England's homelessness legislation by placing duties on local housing authorities to intervene at earlier stages to prevent homelessness in their areas.</p> <p>The Domestic Abuse Act 2021 amends Part 7 of the Housing Act 1996 to strengthen the support available to victims of domestic abuse. The Act extends priority need to all eligible victims of domestic abuse who are homeless as a result of being a victim of domestic abuse.</p>

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Step 1: Scoping the assessment	
	<p>A Sanctuary Scheme meets the definition of ‘safe accommodation’ under the Domestic Abuse Act 2021 and involves the provision and installation of property security measures.</p> <p>The Sanctuary Scheme model was first conceived in the late 1990s, and sanctuaries have since been promoted by government as one housing solution for households at risk of domestic abuse.</p> <p>The Council’s Sanctuary Scheme is a discretionary scheme and was first set up in in 2007 with external agencies able to refer into it from February 2009. The Sanctuary Scheme takes into account non-statutory government guidance - Sanctuary Schemes for Households at Risk of Domestic Violence. This guidance provides advice to all agencies involved in setting up and delivering a Sanctuary Scheme, and promotes and shares good practice.</p>
Step 2: Information collection	
<p>5. What do you know about the groups of people who will be affected? (i.e. demographic information in relation to the protected characteristic groups of age, disability, pregnancy and maternity, religion or belief, race, sex, sexual orientation, gender reassignment, marriage and civil partnership)</p>	<p><u>POPULATION PROFILE – DARTFORD</u></p> <ul style="list-style-type: none"> • Population – Dartford’s population is 120,700. • Sex – There are more female residents than male residents in Dartford with 51.2% females to 48.8% males. • Age – The mean age in Dartford is 37.4 years, which is lower than the overall Kent mean age of 41.7 years. • Ethnicity – The largest ethnic group that people in Dartford identify with is White at 74.5%. This is followed by Black, Black British, Black Welsh, Caribbean or African (10.5%), Asian, Asian British or Asian Welsh (9.9%), Mixed or multiple ethnic groups (3.1%), and Other ethnic groups (2.0%). • Disability – 14.0% of Dartford population are disabled. Of this, 8.3% of people’s activities are limited a lot and 5.7% of people’s activities are limited a little. • Religion or belief – 48.1% of Dartford’s population connect or identify with the Christian religion, followed by 3.8% Hindu, 3.5% Muslim, 1.7% Sikh, 0.6% Buddhist, 0.1% Jewish, and 0.4% other religion. 36.5% of Dartford’s population did not connect or identify with any religion and 5.3% did not answer this question in the Census. • Sexual orientation – 91.2% of Dartford’s population aged 16 years and over identified as straight or heterosexual. 1.2% described themselves as gay or lesbian. 0.9% described themselves as bisexual, and 0.2% described themselves as other sexual orientations. 6.5% did not answer this question in the Census.

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Step 2: Information collection	
	<ul style="list-style-type: none"> • Gender reassignment – 94.3% of Dartford’s population aged 16 years and over identified their gender identity as the same sex as registered at birth. 0.2% of Dartford’s population identified their gender identity as different from the sex they were registered at birth. (Source: 2023 Mid-Year Population Estimates and 2021 Census, Office for National Statistics) <p><u>DARTFORD BOROUGH COUNCIL – TENANT PROFILE</u></p> <p>The Council owns and manages a housing stock of 4,207 properties. Information in relation to profile of Council tenants (Tenant 1 data) is captured by the Council’s Housing Service, as follows:</p> <ul style="list-style-type: none"> • Sex – 66.03% of tenants are female and 33.85% are male (0.12% sex unknown). • Age – 1.59% of tenants are aged 18-24; 20.41% are 25-39; 38.22% are 40-59; and 39.78% are 60+. • Ethnicity – 67.72% of tenants are White; 1.45% are Asian or Asian British; 1.47% are Black or Black British; 2.00% are mixed (27.12% ethnic origin unknown). • Disability/vulnerability – 20.84% of tenants have a disability/vulnerability. (Source: DBC Housing Service) <p><u>NUMBER OF DOMESTIC ABUSE INCIDENTS</u></p> <p>The number of domestic abuse incidents reported to Kent Police in 2024/25 were 2,459. (Source: Kent Police)</p> <p><u>HOMELESSNESS ACCEPTANCES FOR REASON OF DOMESTIC ABUSE</u></p> <p>In 2024/25, 122 homeless applicants were accepted a prevention or relief duty due to domestic abuse. This represented 19.33% of all homeless acceptances (Source: Official homelessness statistics, Department for Levelling Up, Housing and Communities (DLUHC)).</p> <p><u>SANCTUARY SCHEME USAGE</u></p> <p>The spend against the Sanctuary Scheme budget has been low over the previous two years at 34.55% of the allocated budget in 2023/24 and 5.32% of the allocated budget in 2024/25. Low usage of the scheme may be due to lack of awareness amongst agencies. While the scheme is currently promoted on the Council’s website, further promotional opportunities could be explored to encourage further take up of sanctuary measures as a housing solution. <i>Recommendation: Explore further promotional opportunities to promote the Sanctuary Scheme to agencies.</i></p>
6. What consultation has taken place with affected groups?	Consultation will be carried out to inform draft Temporary Accommodation Charging Policy, as set out below in question 7.

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Step 2: Information collection	
Please describe who was consulted and the key findings	
7. Are there any gaps in information? If so, what additional research and/or consultation is needed to ensure that affected groups needs and views are taken into account?	<p>Internal consultation on the review of the Sanctuary Scheme Referral Procedure will be undertaken.</p> <p>In terms of who uses the scheme, the Sanctuary Scheme Referral Form does not currently include questions to monitor use of the scheme by protected characteristics. Monitoring of service users can identify which groups are accessing the scheme which groups are not, which can then assist to highlight any potential inequalities and what actions could be taken to remove any disadvantage.</p> <p>Recommendation: Add additional information collection sections to the Sanctuary Scheme Referral Form to include relevant protected characteristics and any communication support needs.</p> <p>In order to further monitor and consider the effectiveness and impact of the Sanctuary Scheme, it would be beneficial to collect routine data on the number of referrals to the scheme; any reasons why referrals were decided to be inappropriate; the number of sanctuaries installed; the types of sanctuary measures installed; and the types of households using the scheme.</p> <p>Recommendation: Set up mechanisms to monitor the effectiveness and impact of the Sanctuary Scheme.</p>

Step 3: Assessing the equality impact	
8. Consider whether the activity or proposal has or will have any positive or negative equality impacts on the protected characteristic groups in relation to the following aims of the Public Sector Equality Duty:	
<p>a) tackling unlawful discrimination</p> <p>b) promoting equality of opportunity</p> <p>c) promoting good relations</p> <p><u>NOTES:</u></p> <ul style="list-style-type: none"> • The Initial Screening will have identified which aims of the Public Sector Equality Duty are relevant to the activity or proposal for consideration • For existing activities, consider how they are working in practice for each relevant protected group • For new proposals, consider whether there is anything that could give rise to positive and negative equality impacts for each relevant protected group • If there is no identified equality impact, please tick the 'No Impact' box and explain why in question 9 • If the equality impact is unclear, please tick the 'Unknown' box and explain why in question 9 	

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Step 3: Assessing the equality impact

PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
Age	<p>The Domestic Abuse Act 2021 defines domestic abuse as abusive behaviour between two people who are aged 16 or over and who are personally connected to each other.</p> <p>Children are identified as victims of domestic abuse in their own right under the Domestic Abuse Act 2021. The Sanctuary Scheme supports families to be able to remain together safely and reduce the need to move to a new area.</p> <p>Sanctuaries are appropriate for all protected characteristic groups provided the individual wishes to have sanctuary measures installed, it is safe to remain in the property with the measures, and the perpetrator does not live at the property.</p>		<input type="checkbox"/>	<input type="checkbox"/>
Disability	<p>Sanctuaries are appropriate for all protected characteristic groups provided the individual wishes to have sanctuary measures installed, it is safe to remain in the property with the measures, and the perpetrator does not live at the property.</p> <p>In accordance with the Council's Equality and Diversity Document Framework, the Sanctuary Scheme Referral Procedure can be provided in alternative formats, including Braille, audio tape and large print versions of documents. British Sign Language interpreting services can also be provided upon request. Calls can also be received via Relay UK.</p>		<input type="checkbox"/>	<input type="checkbox"/>

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Step 3: Assessing the equality impact

PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
Sex	While domestic abuse can affect anyone, statistically it affects more women than men. However, it is also recognised that the numbers of men reporting domestic abuse are increasing, and that there are additional barriers to men reporting domestic abuse based on social expectations. Sanctuaries are appropriate for all protected characteristic groups provided the individual wishes to have sanctuary measures installed, it is safe to remain in the property with the measures, and the perpetrator does not live at the property.		<input type="checkbox"/>	<input type="checkbox"/>
Gender reassignment	Sanctuaries are appropriate for all protected characteristic groups provided the individual wishes to have sanctuary measures installed, it is safe to remain in the property with the measures, and the perpetrator does not live at the property.		<input type="checkbox"/>	<input type="checkbox"/>
Race	Sanctuaries are appropriate for all protected characteristic groups provided the individual wishes to have sanctuary measures installed, it is safe to remain in the property with the measures, and the perpetrator does not live at the property. In accordance with the Council's Equality & Diversity Document Framework, the Sanctuary Scheme Referral Procedure can be provided in alternative formats including documents translated into other languages. Telephone and face-to-face language		<input type="checkbox"/>	<input type="checkbox"/>

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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	interpreting services can also be provided upon request.			
Religion/Belief	Sanctuaries are appropriate for all protected characteristic groups provided the individual wishes to have sanctuary measures installed, it is safe to remain in the property with the measures, and the perpetrator does not live at the property.		<input type="checkbox"/>	<input type="checkbox"/>
Sexual Orientation	Sanctuaries are appropriate for all protected characteristic groups provided the individual wishes to have sanctuary measures installed, it is safe to remain in the property with the measures, and the perpetrator does not live at the property.		<input type="checkbox"/>	<input type="checkbox"/>
Pregnancy/Maternity	Sanctuaries are appropriate for all protected characteristic groups provided the individual wishes to have sanctuary measures installed, it is safe to remain in the property with the measures, and the perpetrator does not live at the property.		<input type="checkbox"/>	<input type="checkbox"/>
Marriage and Civil Partnership*	Not applicable as the Sanctuary Scheme Referral Procedure does not apply in the context of employment.	Not applicable as the Sanctuary Scheme Referral Procedure does not apply in the context of employment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

* Regarding the protected characteristic of Marriage and Civil Partnership – public bodies need to comply with the first aim of the Public Sector Equality Duty and only in the context of employment.

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Step 3: Assessing the equality impact	
9. If 'no impact' or 'unknown' was selected, please explain	Not applicable.
10. If Dartford Borough Council works with partners to deliver the activity or proposal, please describe any circumstances that could give rise to positive or negative equality impacts between different groups	<p>Sanctuary measures should be part of a multi-agency response to households at risk of domestic abuse. Victims and survivors should have their wider needs assessed and be provided with all necessary support and/or referred to specialist support providers as required.</p> <p>The Council works with agencies referring into the Sanctuary Scheme, for example, this may be health, education, social services, and third sector agencies. The Council may also work with private landlords, and housing associations to arrange the sanctuary measures in their properties.</p> <p>There are no known circumstances where these partnership working arrangements will have a disproportionate or negative impact on the protected characteristic groups other than to positively improve the safety of victims and survivors, and to prevent homelessness. Effective communication with other agencies will ensure the correct support is provided through information sharing.</p> <p>This assessment has identified under question 5 that there may be a lack of awareness of the scheme by agencies due to low spend against budget. It is important to promote the Sanctuary Scheme to external agencies to raise awareness and encourage referrals. Further promotional opportunities could be explored to ensure further take up of sanctuary measures as a housing option.</p>
11. Any other comments	<p><u>BENEFITS OF THE SANCTUARY SCHEME</u></p> <p>The fundamental principle of the Sanctuary Scheme is that it is a choice for victims and survivors of domestic abuse to use the scheme to remain in their own home. It can often be the case that victims and survivors at risk of domestic abuse will suffer the disruption and trauma of having to make a succession of moves, for example, moving from the family home into a refuge or other place of safety, to temporary accommodation, and finally into settled accommodation. For their own safety, households may be rehoused in a new location, but this may be away from important support networks. Sanctuary Schemes can therefore benefit households by:</p>

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Step 3: Assessing the equality impact

- reducing repeat incidents of domestic abuse
- minimising the disruption of having to move home and/or becoming homeless and having to move to a refuge or temporary accommodation
- enabling families to remain in familiar areas and close to support networks, friends and family
- enabling children to remain in their schools and to maintain friendship and support networks.

APPROPRIATENESS OF SANCTUARY MEASURES

The Sanctuary Scheme is potentially appropriate for all groups regardless protected characteristics. Clearly, sanctuary measures are not suitable in all cases for example, if the perpetrator's friends or relatives are living in the property or where it is too dangerous for the household to remain in the area because the perpetrator or the perpetrator's family and friends pose a threat. Sanctuary measures will also not be suitable for people who cannot operate the security measures or follow safety procedures. The suitability of sanctuary measures will always depend on a full risk assessment of the case and the property. Where sanctuary measures are not appropriate, other housing options will be explored with the victim or survivor to ensure their safety.

AWARENESS OF ASSISTANCE TO VICTIMS AND SURVIVORS OF DOMESTIC ABUSE

The current Sanctuary Scheme Referral Procedure is primarily focused on informing external agencies of the procedure to make a referral into the scheme on behalf of a victim or survivor. Although, victims or survivors who wish to seek assistance are able to contact the Housing Service, this is not outlined in the procedure. To include this would help empower individuals and promote equality of opportunity for those reading the procedure who may not be connected to agencies who can refer on their behalf.

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Step 3: Assessing the equality impact	
	<p>Awareness of the option of the scheme might prompt households at risk of domestic abuse who do not wish to leave their homes to seek help rather than stay in an abusive relationship.</p> <p><i>Recommendation: Amend the Sanctuary Scheme Referral Procedure Housing Service for housing options advice and assistance.</i></p> <p><u>COMPLAINTS</u></p> <p>Any person who is not satisfied with the service they have received regarding the Sanctuary Scheme process or who believes they have been discriminated against can make a formal complaint to the Council using the corporate complaints procedure. The Sanctuary Scheme Referral Procedure does not currently provide information on how to make a complaint, therefore referrers and service users may not know their right to use the complaints process or how to complain.</p> <p><i>Recommendation: Amend the Sanctuary Scheme Referral Procedure to include details of the corporate complaints procedure.</i></p>

Step 4: Action plan					
12. Based on the information in Steps 1 to 3, please list the actions that will be taken to address: a) any gaps in information and consultation b) how any negative impacts on equality will be mitigated or eradicated					
a) If additional information and/or consultation is required or the impact is still unclear, what actions will you put in place to gather the information you need?					
Information needs	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
The Sanctuary Scheme Referral Form does not currently include equality	Add additional information collection sections to the Sanctuary Scheme	Monitoring of service users can identify which groups are using the scheme	December 2025	As set out under question 15 below	Senior Housing Policy & Performance Officer

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Information needs	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
monitoring questions to monitor use of the scheme by protected characteristics	Referral Form to include relevant protected characteristics and any communication support needs	which groups are not, which can then assist to highlight any potential inequalities and what actions could be taken to remove any disadvantage			
Routine monitoring of the effectiveness and impact of the Sanctuary Scheme	Set up mechanisms to monitor the effectiveness and impact of the Sanctuary Scheme	To have sufficient information in order to be able to effectively evaluate whether the Sanctuary Scheme is meeting its objectives	January 2026	As set out under question 15 below	Housing Solutions & Private Sector Manager / Tenancy Services Manager

b) If any negative impacts on equality were found, what actions will you put in place to mitigate or eradicate these impacts?

Identified impacts (and who is affected)	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
Low spend against budget of the scheme may be due to lack of awareness amongst agencies and Housing Service staff	Explore further promotional opportunities to promote the Sanctuary Scheme to agencies	Increased referrals to the Sanctuary Scheme and more individuals assisted to remain in their homes and prevent homelessness	January 2026	As set out under question 15 below	Housing Solutions & Private Sector Manager / Tenancy Services Manager
The current Sanctuary Scheme Referral Procedure is focused on informing external agencies of the procedure to make a referral into the scheme on behalf of a	The Sanctuary Scheme Referral Procedure should be amended to include details of how victims and survivors can contact the Housing Service for housing	Help to empower individuals and promote equality of opportunity for those who may not be connected to agencies who can refer on their behalf	December 2025	As set out under question 15 below	Senior Housing Policy & Performance Officer

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Identified impacts (and who is affected)	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
household. Although, victims and survivors who wish to seek assistance are able to contact the Housing Service, however this is not outlined in the procedure	options advice and assistance				
Where there is dissatisfaction with the service received, the Sanctuary Scheme Referral Procedure does not currently provide information on how to make a complaint	Amend the Sanctuary Scheme Referral Procedure to include details of the corporate complaints procedure	Referrers and service users will be informed of their right to make a complaint and how to complain	December 2025	As set out under question 15 below	Senior Housing Policy & Performance Officer

Step 5: Decision making and future monitoring	
13. Which decision making process does this Customer Access Review need to go through? i.e. who does this need to be approved by?	Head of Legal Services and Director of Housing & Public Protection
14. Is the subject of the Customer Access Review going to committee? If yes, include your findings in the committee report and attach this assessment to the report	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
15. How will you continue to monitor the activity or proposal on protected characteristic groups?	<p>This assessment recommends that the following information should be monitored to help assess whether the Sanctuary Scheme is meeting its objectives and that it is accessed by all groups who need it:</p> <ul style="list-style-type: none"> • number of households referred to the Sanctuary Scheme • tenure of households referred • referring agencies

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Step 5: Decision making and future monitoring	
	<ul style="list-style-type: none"> • number of referrals accepted • number of referrals not accepted and by reason • reasons why households chose not to have sanctuary measures installed • household types and characteristics (families with children, lone person households, gender, ethnicity, age etc) • number and types of sanctuary measures installed • cost of sanctuaries installed <p>Complaints data will also be monitored.</p>
16. When will you review this Customer Access Review?	The Sanctuary Scheme Referral Procedure will be reviewed every three years, and a new Customer Access Review will be undertaken in conjunction with the review of the procedure.
Step 6: Final steps	
17. Once this Customer Access Review has been approved, send this assessment to the Policy & Projects Officer	
18. Implement the actions identified from this Customer Access Review and ensure progress is monitored and recorded	

Reviewed by Legal Services

J.Wenham

12.12.2025

Reviewed by Director of Housing & Public Protection



5.12.2025.