



**Report on DFV
safety modifications
practice for
community housing
providers**



**nsw Federation of
Housing Associations inc**

Report on DFV safety modifications practice of community housing providers

The NSW Federation of Housing Associations undertook a survey of its members in December 2017 to gain an understanding of industry practice and approaches to the delivery of safety modifications to their properties for tenants who are victims of domestic and family violence (DFV). This follows the roll out of the *Strengthening practice in responding to domestic and family violence: A toolkit for community housing providers* in 2017 (DFV Toolkit) and is designed to support implementation of best practice in the management of DFV by community housing providers in NSW.

The overall findings of the survey indicate a strong commitment from community housing providers to support tenants who are experiencing DFV and to improve their practice in this area. The survey shows that significant progress has been made by the industry in terms of developing and implementing policies and processes that improve their capacity to respond to DFV safety modification requests in a way that puts the tenant at the centre of decision making.

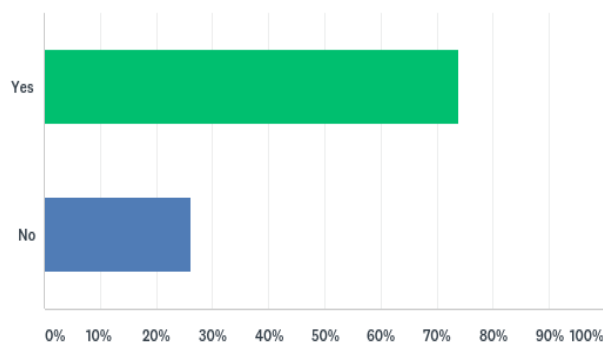
There are areas where some provider practice may not be in line with practice set out in the DFV Toolkit and this has been highlighted in the report. There is a clear need for further work in response to the survey, in particular developing shared definitions for DFV safety modifications and establishing best practice policies and procedures to support the industry to keep improving in this really important area of its work.

1. Survey responses

There were a total of 20 providers that responded to the online survey. Some providers responded more than once, resulting in 23 survey returns. Community housing providers from all registration tiers responded, with a mix of metropolitan, regional and rural providers, including four Aboriginal community housing providers. This level of responsiveness reflects strong engagement from the sector in terms of responding to DFV and a commitment to improving practice in this area.

This report provides a summary of provider responses to the survey and identifies some of the key issues for further consideration.

2. Has your organisation undertaken safety modifications for a property/s?



Seventeen (74%) community housing providers reported that they had undertaken DFV safety modifications with six (26%) reporting that they had not undertaken safety modifications.

Responses from providers that had not carried out any safety modifications indicates that additional work is needed to define safety modifications in the context of DFV as distinct from routine maintenance and repairs, fire safety requirements, and accessibility modifications.

Some providers indicated that they had undertaken modifications, including the replacement of locks, installation of locks on windows, and installation of sensor lights, but did not view these as DFV safety modifications specifically. A number of providers explicitly stated that a clear definition of DFV safety modifications would assist them with their practice.

3. If no, please select the reason why safety modifications haven't been done by your organisation

Seven community housing provider stated they have not carried out safety modifications. Some of their responses were:

- no identified need and no tenant request
- funding is sourced elsewhere for safety modifications for example domestic and family violence services, NDIS
- safety modifications implies a full needs assessment and response rather than just changing locks or installing sensor lights
- have a case by case approach usually to an incident
- standard for window locks and basic locking mechanisms are applied to all dwellings
- What is classed as a safety modification - term is too broad to answer e.g. smoke alarms could be classed as safety, hand rails etc. - more details are needed

4. What assistance would assist your organisation to undertake safety modifications (for example, a template policy on safety modifications)

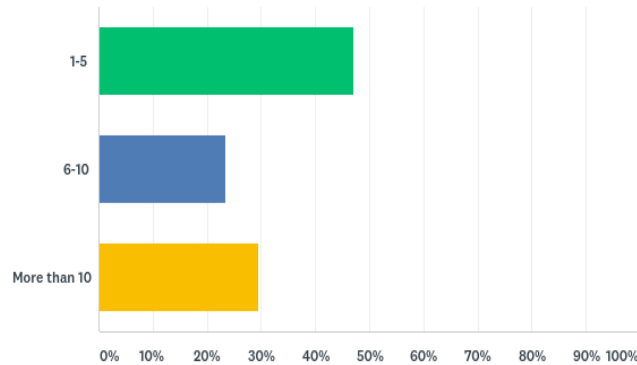
Five providers responded to this question. Their responses included:

- specific funding for community housing providers to apply for
- a template policy
- use of qualified assessors
- a definition and better clarity about safety modifications and what actual modification type it relates to - is it something that can be rolled out over a complete portfolio e.g. external lighting, window screen quality etc.?

Responses to questions 3 and 4 suggest that the development of shared language and definitions around DFV safety modifications would be useful to providers.

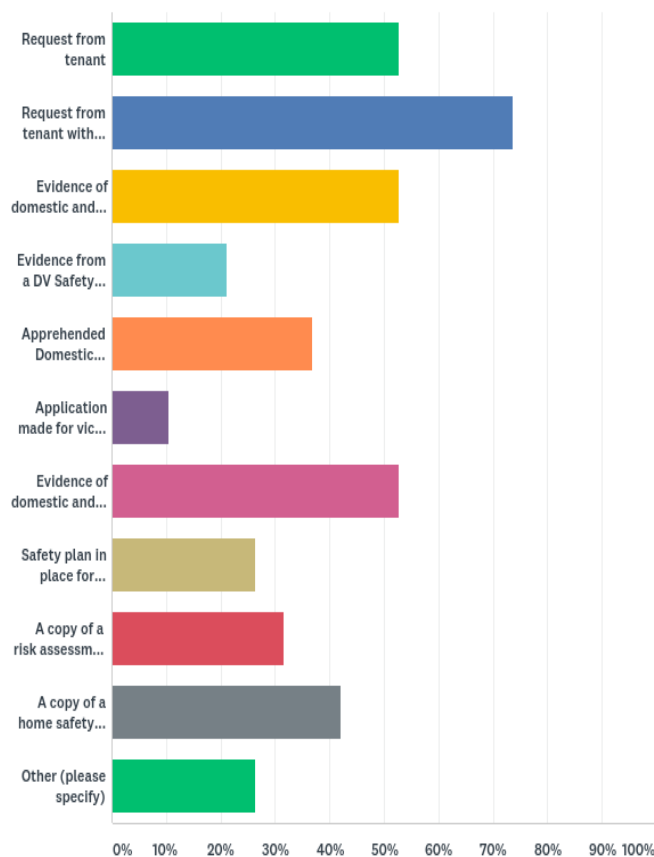
There are significant questions about the level of general safety mechanisms that should be provided for the whole portfolio, and what it is that distinguishes safety modifications in response to DFV.

5. If your organisation has undertaken safety modifications, approximately how many properties has your organisation modified for safety reasons?



Of the providers that had carried out safety modifications, 47% had undertaken them fewer than five times, 24% had undertaken them six to ten times, and 29% more than ten times.

6. What is the evidence required for your organisation to consider making safety modifications?



Providers could select multiple answers for this question and many responded that they would not seek evidence for all of the categories listed, just one of them.

The main evidence requirements identified by community housing providers were:

- Ten (53%) identified a request from a tenant
- Fourteen (74%) identified a request from a tenant with support from a support worker
- Ten (53%) identified evidence of DFV such as a police report
- Four (21%) identified evidence from a DV Safety Assessment Tool report
- Seven (37%) identified an AVO in place
- Two (11%) identified an application made for victim support funds
- Ten (53%) identified evidence of DFV such as a support letter from a support worker
- Five (26%) identified a safety plan in place for a tenant
- Six (32%) identified a copy of a risk assessment undertaken by a support worker
- Eight (42%) identified a copy of a home safety assessment completed by a support worker
- One provider commented that they would need more information for a major request
- One provider commented that it would depend on the assessment of risk

Most organisations accept a broad range of documents as evidence that the tenant is experiencing DFV.

Increasingly the threshold for evidence about DFV more generally is getting lower following a better understanding of how challenging it can be for victims to tackle it through formal channels. For example it may not be sufficient to assume that a DFV safety modification request will come from a support agency as the tenant may not be receiving any formal support.

Proposed changes to the Residential Tenancies Act in relation to DFV also support the need for much more responsive approach by landlords.

7. What is your procedure for approving a request for safety modifications?

Nineteen providers responded to this question and the processes for requesting and approving DFV safety modifications really varied across organisations. Approaches included:

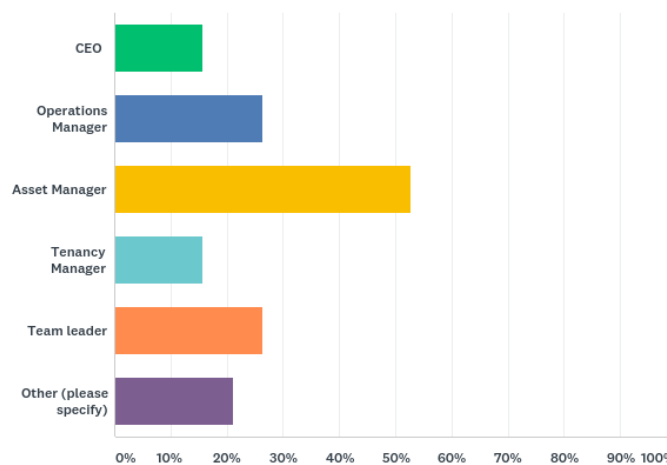
- 'we do a home safety audit and risk assessment'
- approval would be given if it was deemed the tenants and occupant's safety was at risk at that particular time and the safety component required would add an increase into the properties amenity
- 'the request via a tenant and our support worker is sufficient for me as operations manager to approve the modifications'
- tenant completes a modification request with supporting documentation among the options outlined in question 6
- CEO makes decision after viewing documents provided and speaking with support provider
- request through the normal modifications/alterations process to asset team for approval - asset team discusses with the housing officer - also look at transfer if significant risk.
- OT report in support of tenant and housing manager makes determination whether to proceed or not.
- Out of guidelines request made by the tenancy manager with evidence - approval by Operations GM and Property and Development GM
- Tenants are required to complete an Alteration/Addition to Property Form. The request is assessed in line with the organisation's Asset Management Plan

- submitted via an internal service request for executive management approval
- Case by case – mostly minor work requested by a support provider. Sometimes third party involvement is required at leasehold properties and some requests have had to be denied as the locks/screen doors go against fire safety rules
- Depends on whether there is funding from an external party or on the scale of the modifications requested
- Approval by divisional manager asset services

Provider responses indicated a wide variation in approval processes for DFV safety modifications, suggesting that further work may be useful to highlight best practice. Key principles underpinning approval processes should be a focus on outcomes for the victim, ensuring an immediate and urgent response to DFV safety modification requests, and establishing links and referral pathways with partnering organisations to provide specialist expertise.

One community housing provider indicated that a management transfer would be considered if DFV safety modifications were not viable, or if modifications were not sufficient to ensure the safety of victims. This was not a direct question asked of respondents, so further research to understand how providers use management transfers in the context of supporting tenants experiencing DFV might be helpful.

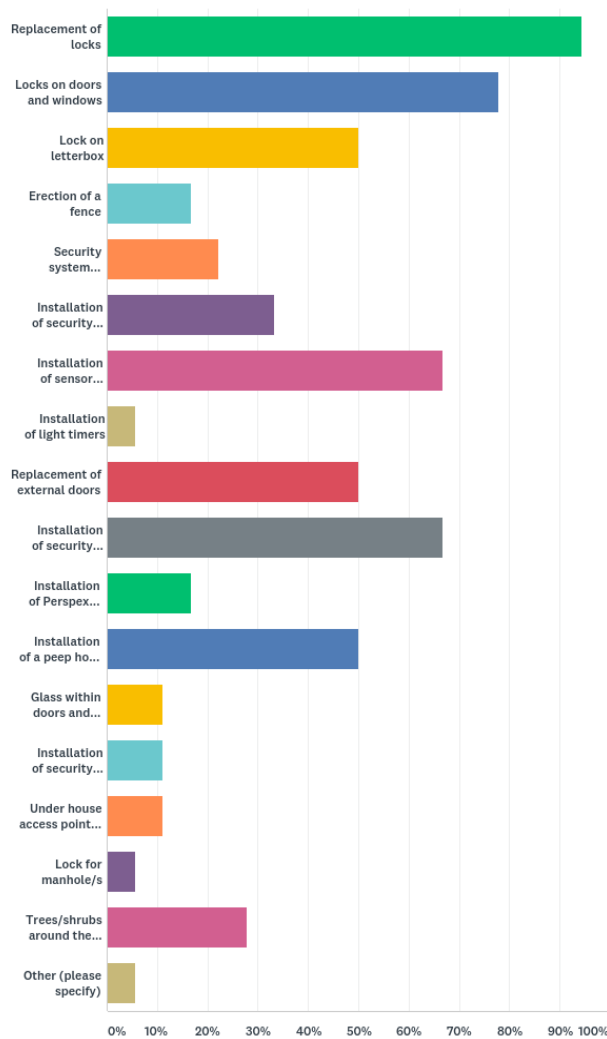
8. Who in your organisation approves or declines safety modification requests?



- Three providers (16%) identified the CEO
- Five (26%) identified the Operations Manager
- Ten (53%) identified the Asset Manager
- Three (16%) identified the Tenancy Manager
- Five (26%) identified the Team Leader

More than 50% of organisations indicated that responsibility for approving or declining DFV safety modifications sat with the Asset Manager. There is a question of whether Asset Managers are best placed to make a final decision about whether to proceed with safety modifications or not given their role in safeguarding the organisation’s investment in assets which may not always accord with an understanding of DFV and best practice in supporting victims.

9. Please select the types of safety modifications your organisation has made

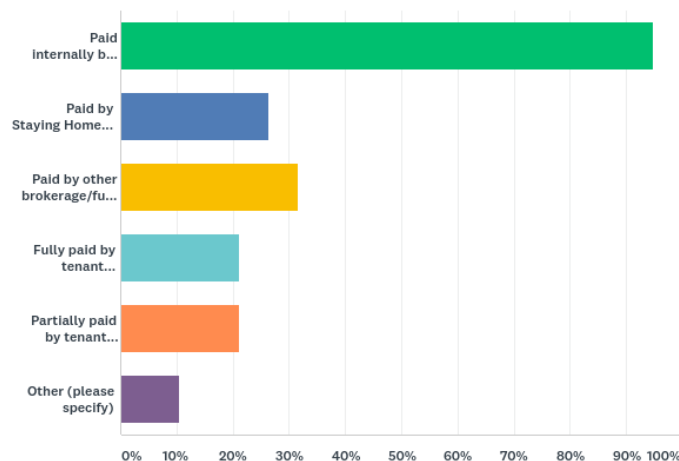


Community housing providers reported carrying out a variety of safety modifications, including:

- Seventeen (94%) identified replacement of locks
- Fourteen (78%) identified new locks on door and windows
- Twelve (67%) identified installation of sensor lights
- Twelve (67%) identified installation of a security screen door
- Nine (50%) identified locks on letterboxes
- Nine (50%) identified installation of a peep hole in the front door
- Nine (50%) identified replacement of external doors
- Six (33%) identified installation of a camera

- Five (28%) identified trees and shrubs around the property being trimmed
- Four (22%) identified a security system being installed, such as an alarm system
- Three (17%) identified erection of a fence
- Three (17%) identified installation of perspex around the main door handle
- Two (11%) identified reinforcement of glass within doors and windows
- Two CHPs (11%) identified installation of security grilles or shutters
- Two CHPs (11%) identified under house access points secured
- One CHP (6%) identified a lock for manholes

10. How does your organisation pay for safety modifications?



Providers could select more than one response to this question and there is significant variation in how providers are paying for safety modification:

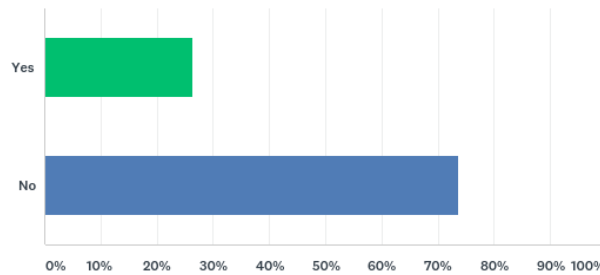
- Eighteen (95%) identified that they paid for safety modifications
- Five (26%) identified that the costs were met by the Staying Home Leaving Violence Program
- Six (32%) identified that costs were met by other brokerage funds/funding
- Four (21%) identified that costs were met by tenants including through repayment plans)
- Four (21%) identified costs as partially met by tenants including through repayment plans
 - Two (11%) identified other that support providers had also funded some requests and Victims Services

While 95% of respondents indicated that at least a proportion of the cost of DFV safety modifications was paid internally by the organisation up front, 21% of respondents indicated that tenants were responsible for bearing the full cost of modifications and a further 21% indicated that tenants were responsible for bearing part of the cost of modifications.

As set out in the DFV Toolkit, economic abuse is increasingly understood to be a key aspect of DFV, and victims are often not in a position to support significant costs as a result of the DFV they have experienced. There is question as to whether requesting that tenants bear the full or partial cost of any DFV safety modifications is in line with current best practice.

Whilst it is understood that all modifications are an impost on a provider's budget, the use of SHS funds to pay for safety modifications is also not considered to be appropriate given that the SHS Brokerage Guidelines do not allow for brokerage funds to meet capital costs.

11. Is there a financial limit for safety modifications?



The overwhelming majority of providers, 74%, said they had not financial limit. Only five providers or 26% said they had a limit.

12. If there is a financial limit for safety modifications, please state the amount

The five CHPs that said they do set a limit for safety modification stated the following:

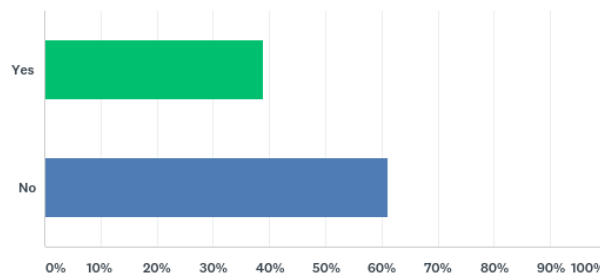
- Three assessed a cost limit on a case by case basis
- One identified \$5,000 as the cap
- One said that if modifications were too expensive they would look to move the tenant to a more suitable property

13. What is the average cost of safety modifications you have undertaken?

Fifteen providers responded to this question and the amounts ranged from \$3,000 at the upper end of the scale to \$200 at the lower end.

- Three providers had spent between \$1,500 and \$3,000
- Eight providers had spent between \$200 and \$500

14. Would your organisation undertake safety modifications if the tenant (victim) was still in a relationship with the perpetrator?



Responses to this question indicated that 61% of respondents would not undertake safety modifications if the victim was still in a relationship with their partner. This practice raises issues as it is not in accordance with what is possible under the law. Apprehended Domestic Violence Orders (ADVOs) do, in some circumstances, permit co-habitation and community housing providers should review their policies in this regard.

There are safety modifications that can improve outcomes in this circumstance, for example light sensors that give a victim warning about someone approaching the house so they can prepare.

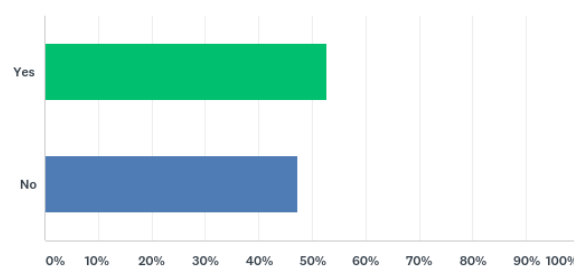
15. What partnerships or working relationships does your organisation have that influenced your planning and implementation of safety modifications?

Thirteen providers responded to this question.

- Two providers identified that no relationship would influence their planning and implementation of safety modifications.
- Eleven providers identified relationships with SHLV services, Local Area Commands (Police) and SHS services as being important in their decision making

All of the evidence about responding to DFV highlights the critical nature of working in partnership as a way to ensure the safety of victims and the DFV Toolkit clearly identifies this as a core element of best practice.

16. Is a home safety assessment undertaken to assist your organisation establish what types of safety modifications should be undertaken?



- Ten CHPs (53%) yes
- Nine CHPs (47%) no

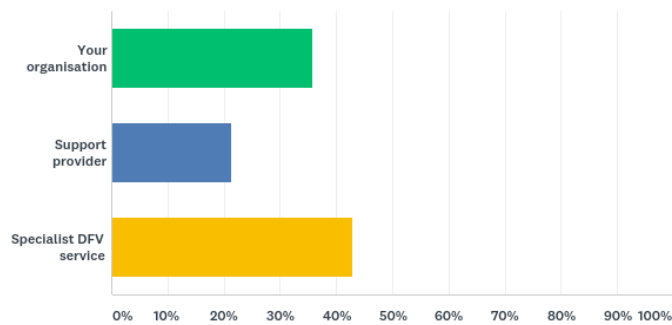
53% of respondents indicated that a home safety assessment was undertaken to determine the safety modifications required to meet the needs of the tenant based on individual circumstances and 47% said no.

Of the providers who reported undertaking home safety assessments, 43% said that they were undertaken by a specialist DFV support service. The DFV Toolkit recommends that a comprehensive home safety assessment be conducted if a tenant requests DFV safety modifications as this will ensure that opportunities to improve the safety of the tenant are not missed, and will minimise the need for them to make multiple requests.

Assessment should be carried out by a specialist support organisation with expertise in DFV to ensure the best outcomes for tenants. Where there is no local service, providers should identify a suitably qualified expert advisor.

Providers should also include in their policies what urgent action they will take in advance of being able to schedule a full home safety assessment.

17. If a home safety assessment is undertaken, which organisation undertakes it?



Fourteen providers responded to this question with five (36%) identifying their own organisation, six (43%) identifying a specialist DFV service and three (21%) identifying a general or homelessness support service.