### Equality Impact Assessment (EIA): Remodelling of accommodation services for victims of domestic abuse

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Since the Equality Act 2010 came into force the council has continued to be committed to ensuring we provide services that meet the diverse needs of our community as well as ensure we are an organisation that is sensitive to the needs of individuals within our workforce. This Equality Impact Assessment (EIA) has been developed as a tool to enable business units to fully consider the impact of proposed decisions on the community.

This EIA will evidence that you have fully considered the impact of your proposal / strategy and carried out appropriate consultation with key stakeholders. The EIA will allow Councillors and Senior Officers to make informed decisions as part of the council's decision-making process.

**Executive Lead / Head Sign off:** 

Executive Lead(s)	Cllr Christine Scouler	Executive Head:	Caroline Taylor – Director of Adult Services
Date:		Date:	

### Relevance Test – 'A Proportionate Approach'

Not all of the proposals or strategies we put forward will be 'relevant' in terms of the actual or potential impact on the community in relation to equality and vulnerable groups. For instance, a report on changing a supplier of copier paper may not require an EIA to be completed whereas a report outlining a proposal for a new community swimming pool or a report proposing a closure of a service would.

Therefore before completing the EIA please answer the following questions. If you answer 'yes' to any of the questions below you must complete a full EIA.

1)	Does this report relate to a key decision?	Y⊠	N_
2)	Will the decision have an impact (i.e. a positive or negative effect/change) on any of the following:		

The Community (including specific impacts upon the vulnerable or equality groups)  Our Portners	YX VX	N
<ul> <li>Our Partners</li> <li>The Council (including our structure, 'knock-on' effects for other business units, our</li> </ul>	Υ⊠	N
reputation, finances, legal obligations or service provision)		

Section 1: Purpose of the proposal/strategy/decision

No	Question	Details
1.	Clearly set out the proposal and what is the intended outcome?	The development of this proposal was initiated by the Domestic Abuse Steering Group, of which key partners are Police, Torbay Council (through Safer Communities, Children's Services, Housing Services, and Public Health), the Clinical Commissioning Group and Probation. The Steering Group felt that a new model for accommodation services may be able to provide a more equitable service for women fleeing domestic abuse. The Steering Group have set out that they will ensure that there are clear alternative options for accommodation available if the decision is made to move from a refuge model to an emergency accommodation model so that there will continue to be emergency accommodation provision for women and children fleeing domestic abuse.
		The proposal is to change the accommodation provision offered to women and children fleeing domestic abuse from a refuge model to an emergency accommodation model.
		The reasons for the proposed change are:
		<ul> <li>To provide equity of service to all women and children fleeing domestic abuse in terms of the initial advice they receive prior to placement, and the services they receive</li> <li>To provide greater value for money for the Local Authority by delivering emergency accommodation linked to specialist outreach support</li> </ul>
		<ul> <li>The objectives of the proposal are:</li> <li>Housing Options Service to provide a range of accommodation options to women and children fleeing domestic abuse; including a women only accommodation unit and accommodation that meets the needs of women with more complex needs such as drug and alcohol users.</li> <li>Housing Options Service staff to be trained to undertake Domestic Abuse specific Risk Assessments prior to placement to ensure appropriate placements are made</li> <li>Delivery of fast track outreach intervention to victims of domestic abuse placed into emergency accommodation provisions</li> <li>Compliance with homeless legislation. Currently when women and children are placed in the refuge their housing options interview is undertaken after placement, this means that Torbay Council has not had the opportunity to undertake an investigation into whether the person is eligible for assistance prior to this placement (s.184 of Housing Act 1996). Further this means that the range of homelessness prevention options have not been explored prior to placement, alternative options would include reconnecting to an area with support networks, alternate accommodation moves into the Private Rented Sector under Localism.</li> <li>To ensure women and children using the service do not become homeless or lose their support.</li> </ul>

No	Question	<b>Details</b>
		<ul> <li>The intended outcomes of this proposal are:</li> <li>A more equitable service people fleeing domestic abuse</li> <li>Women and their children are supported to achieve independent living and sustainable accommodation.</li> <li>Housing Services involvement in all pre-placement work as per s.184 Housing Act 1996 and to undertake CAADA DASH Risk Assessment (Domestic Abuse risk assessment tool)</li> <li>Where it is appropriate and safe to do so, a focus on supporting women and children from Torbay.</li> </ul> Consultation on this proposal will inform the recommendation for decision and any further specifications which will be developed as a result of the decision.
2.	Who is intended to benefit / who will be affected?	The Supporting People (SP) programme funds and develops support services to help vulnerable people live independent lives. Support prevents homelessness and promotes independence through help with budgeting, accessing services, building social networks, resettling into a new home, maintaining tenancy and mortgage conditions and so on.  The refuge service is for women and children fleeing domestic abuse and they will be most affected. Clients currently within the refuge model will need support in the transition to the new emergency accommodation model as well as continuing to have their own individual move on plan. Women and children requiring an emergency safe bed space in the future will have their needs met in a different way.  Key stakeholders affected by this proposal are:  • Women and children fleeing domestic abuse  • Current provider of the refuge service, Westcountry Housing
		<ul> <li>Health Services including drug and alcohol services, GPs, Torbay Hospital</li> <li>Torbay Council services including Housing Options Service, Children's Services, Safer Communities</li> <li>Devon and Cornwall Police.</li> </ul>

#### Section 2: Equalities, consultation and engagement

Torbay Council has a moral obligation as well as a duty under the Equality Act 2010 to eliminate discrimination, promote good relations and advance equality of opportunity between people who share a protected characteristic and people who do not.

The **equalities**, **consultation and engagement** section ensures that, as a council, we take into account the Public Sector Equality Duty at an early stage and provide evidence to ensure that we fully consider the impact of our decisions / proposals on the Torbay community.

#### **Evidence, consultation and engagement**

No	Question		Details					
3.	Have you considered the	Supporting People currently commission Westcountry Housing to provide 7 units (beds / rooms) of refuge provision.						
	available evidence?	The number of women and children placed in the refuge is outlined in the table below:						
			2012/13 2011/12					
		Number of commissioned Units	7	14				
		Number of women placed	28	46				
		Number of women with a local connection	5	18				
		Number of children	44	40				
		service for:					Total	
				8	16			
		Between 3 and 6 months		1	1	3	2	7
		Between 6 and 9 months		3	1	1	1	6
		Between 9 and 12 months		1	0	0	0	1
		Between 1 year and 18 months 0 0 0 <b>0</b>				0		
		Between 18 months and 2 years 0 0 0 <b>0</b>				0		
		Over 2 years 0 0 0 <b>0</b>				0		
		Total		9	3	7	11	30

No	Question	Details
		In 2012-13 the Housing Options Services accommodated 60 clients in emergency accommodation who were at risk of becoming homeless due to violent breakdown of relationship involving partner.
		In respect of future demand, it is not possible to determine the actual number of people who experience domestic abuse. Data from the draft Strategic Assessment 2013/14 reports:
approximately 2 out of 5 dom once in a year. Repeat victim national findings to Torbay fig		In 2011/12 there were 3,187 incidents recorded by the police of domestic abuse. Latest national data indicates that approximately 2 out of 5 domestic abuse incidents are reported to the police and 44% of victims are victimised more than once in a year. Repeat victimisation accounted for almost three quarters of domestic abuse incidents. If we apply these national findings to Torbay figures, there would have been an estimated 8,172 incidents of domestic abuse in 2011/12 with 3,940 victims, 1,734 of which would have been repeat victims.
		Safer Communities engaged with 138 victims (women and men) of domestic abuse, including repeat victims through the IDVA service (Independent Domestic Violence and Abuse Service)
		150 victims (women and men) entered the Domestic Abuse Support Service.
		In 2012/13 50% of women placed in the refuge were under Multi Agency Risk Assessment Conferences (MARAC) arrangements meaning they were assessed at medium or high risk of harm.
		In May 2013, there were 170 children in Torbay who were the subject of Child Protection Plans and domestic abuse was a factor in 100 of these cases (59%).

No	Question	Details
4.	How have you consulted on the proposal?	Following the development of the proposal, consultation was undertaken with those people and key stakeholders who would be affected should the proposal be implemented. Consultation was carried out with the following groups:  Current provider of the refuge, Westcountry Housing:
		An initial meeting which took place on 27 <sup>th</sup> August
		<ul> <li>Advised of the proposals and provided details along with a question and asked to respond by 18<sup>th</sup> September.</li> <li>Westcountry Housing were advised of how further representations could be made in writing.</li> </ul>
		<ul> <li>Women currently accommodated in the refuge and those who have previously stayed in refuge accommodation:</li> <li>12 women took part in focus groups which took place on 23<sup>rd</sup> and 24<sup>th</sup> September 2013</li> <li>7 telephone interviews were also undertaken with women who had previously used refuge provision</li> <li>Advised of the proposal and took part in a facilitated discussion regarding the current service model and the proposal.</li> </ul>
		<ul> <li>Local and national partner organisations including:         <ul> <li>Departments across Torbay Council which provide domestic abuse services, Devon and Cornwall Police, Drug and Alcohol services, Clinical Commissioning Group, Refuge, Women's Aid, Victim Support</li> <li>Partners were sent information outlining the current model and the proposed model along with a question plan for them to return.</li> <li>Partners were also advised they could make representations in writing via email and letter.</li> <li>Information was issued to partners on 4<sup>th</sup> September with an initial response dates of 18<sup>th</sup> September which was then extended to the 25<sup>th</sup> September 2013.</li> <li>Responses have been received from six organisations.</li> </ul> </li> </ul>
		<ul> <li>Wider members of the public (non service users):</li> <li>Online survey was developed to allow any member of the public to have their say in relation to this proposal.</li> <li>This survey was open between 6<sup>th</sup> September and 25<sup>th</sup> September 2013 and 273 responses were received.</li> </ul>
		In response to feedback received the consultation period for this proposal was extended and was closed on 30 <sup>th</sup> October 2013.
5.	Outline the key findings	Initial feedback from the Domestic Abuse Steering Group was that a new model for accommodation services may be able to provide a more equitable service for individuals fleeing domestic abuse. The Housing Option Services supported the development of an alternative proposal so they can effectively undertake their statutory responsibility. There was also support from Children's Services who stated that 59% of their child protection cases involved domestic abuse (including

No	Question	Details
		families who are accommodated at the refuge) and these families could be better supported to reconnect with areas where they have existing support networks available.
		A full report on the consultation feedback received is available and provided as supporting documentation to this EIA. A summary of the feedback from all methods of consultation received to date is outlined below:
		The current model:
		<ul> <li>The refuge provides peer support for women, they make friends with others who are in similar situations and have this support network available. Friendships are maintained once women move into the community.</li> <li>There is on-site specialist support for women and their children.</li> </ul>
		<ul> <li>Children at the refuge are supported by access to support workers, play workers, but also get to build friendships with children in similar situations.</li> </ul>
		The refuge provides safe and secure accommodation for women.
		Staff are always available at the refuge.
		The refuge is part of a national network and they are a well know model of service provision.  The refuge data not most surrent demand as it is and there is a waiting list for continue.
		<ul> <li>The refuge does not meet current demand as it is and there is a waiting list for services.</li> <li>There can sometimes be delays for women in getting the right type of room at the refuge while they wait for one to</li> </ul>
		become available.
		<ul> <li>The current model does not match accommodation to need, there needs to be a variety of provision available and support needs to be client focussed.</li> </ul>
		<ul> <li>Living in shared accommodation such as refuge can have a negative impact on some women with complex needs.</li> <li>Refuge accommodation can be identifiable over time.</li> </ul>
		<ul> <li>Dynamics of shared accommodation mean that there can be disagreements between women.</li> </ul>
		The Proposed model:
		The majority of respondents (91.3%) who completed the online consultation disagreed with the proposal.
		The model needs further clarity on how temporary accommodation will be provided and procured.
		<ul> <li>The proposed model does not appear to consider support for domestic abuse victims holistically.</li> </ul>
		There will be a lack of independent specialist advice and support.
		There will be a lack of provision for women who need to leave their homes urgently.
		Risk that without a refuge women will choose to stay with their partners.
		Concerns regarding the capacity of housing officers to undertake assessments.  Concerns that assessments will be carried out by loss synarioned staff.
		<ul> <li>Concerns that assessments will be carried out by less experienced staff.</li> <li>There is the potential for increased demand on other services which may result in greater expenditure.</li> </ul>
		<ul> <li>No information relating to how children will be supported and safeguarded.</li> </ul>
		140 Information relating to now enflurent will be supported and safeguarded.

No	Question	Details
		<ul> <li>It is considered too risky to place women in the private rented sector.</li> <li>Women need the support of a refuge and without one will not develop the skills they need for successful independence.</li> <li>There is a need for women to be able to move out of area and if priority is given to local people then some women from outside Torbay may be put at greater risk.</li> <li>Lack of an out of hours service.</li> <li>Greater isolation for women who will not receive the peer support they currently value in the refuge.</li> <li>The proposed model may provide more flexibility and more targeted support.</li> <li>Through the proposed model individuals will be matched more effectively against their needs.</li> <li>The proposed model will offer opportunities for improved safeguarding with smoother processes for sharing information.</li> <li>The proposed model provides a better change for successful move on.</li> </ul>
6.	What amendments may be required as a result of the consultation?	The following considerations need to be taken into account in the development of any service specification for domestic abuse services including accommodation services (all of these issues were raised through the consultation activity):  Staff levels, both in the Housing Options Services and Outreach Workers to ensure that demand for services can be met. Outreach workers should be accessible and respond to enquiries in a timely manner.  It can be difficult for women to discuss their situations so consideration should be given to where accommodation interviews can take place, as well as whether childcare can be provided.  The process to be accommodated under a new model should be quicker than the current model.  Ensuring the confidentiality of emergency accommodation is critical, accommodation must be safe and secure.  Women who have experienced domestic abuse find a lot of peer support in being accommodated together and are able to share their experiences.  The standards of emergency accommodation.  Provision of services for children such as play sessions, assisting them to have more normality in their life and support for getting children back in to school.  Providing a variety of options for accommodation.

## Positive and negative equality impacts

0	Question	Details					
	Identify the potential positive and negative impacts on specific groups	It is not enough to state that a proposal will affect everyone equally. There should be more in-depth consideration of available evidence to see if particular groups are more likely to be affected than others – use the table below. You should also consider workforce issues. If you consider there to be no positive or negative impacts use the 'neutral' column to explain why. EVERY BOX MUST BE COMPLETED – if there is no impact please state either 'No Positive Impact' or 'No Negative Impact'.  ** Views presented are those presented in the consultation					
		Positive Impact	Neutral Impact				
	Older or younger people	In May 2013, 59% of child protection cases involve domestic abuse and this includes families placed in the refuge from out of the area. **Some of these families could have been better supported to reconnect to areas where support networks are available.	Children who are placed in the refuge receive services such as play sessions and families are supported with getting children into school and getting back to normality. These services may not be available is a refuge is not provided.  **Some emergency accommodation may not be appropriate for children and may be short term.	Highest proportion of clients in 2012/13 were aged between 30-39.  At any one time the refuge can provide accommodation for 7 women and up to 21 children/babies. In 2012/13, 44 children were accommodated at the refuge with their families.  Emergency accommodation for women with children fleeing domestic abuse will continue to be provided through the proposed model.  Outreach service / floating support service will continue to be provided to clients placed in alternative housing options.			
	People with caring Responsibilities	In May 2013, 59% of child protection cases involve domestic abuse and this includes families placed in the refuge from out of the area. **Some of these families could have been better supported to reconnect to areas where support networks are available.	Under this proposal there will be no provision of the 'traditional' all inclusive refuge accommodation and support service for women with caring responsibilities fleeing domestic abuse.  **This may mean women choose not to flee domestic abuse and stay with their partners.	Emergency accommodation for women with children fleeing domestic abuse will continue to be provided through the proposed model.  Outreach service / floating support service will continue to be provided to people with caring responsibilities.			

No	Question	Details		
	QUOUNT	Male and Female victims of domestic abuse placed in emergency accommodation will be fast-tracked to the domestic abuse outreach service.  ** Women who have older male children with them when they flee domestic abuse are not currently able to access refuge provision. Under these proposals, these women will be matched appropriately to accommodation according to their needs.	**There is a potential for an increased risk to safety of service users by any delay in placement due to waiting time for housing appointment.  **There is potential for an increased risk to safety of service users due to there being no 'traditional' confidential accommodation unit.  **Under the proposals women with caring responsibilities may not have peer support networks available to them which could lead to feelings isolation and an increased risk they will return to their partners.  **There are concerns that under the proposals there will be a lack of specialist support available.	
	People with a disability	Housing Options will commission a framework of emergency accommodation and the specification will include a requirement for a proportion of accessible units.  **There is a concern that shared accommodation, such as a refuge, can have a negative impact on women with complex needs including mental health needs. Under these proposals these women will matched appropriately according to their needs.	None identified at this stage	In 2012/13, 3 out of the 28 clients using the refuge said they had a disability.
	Women or men	Both female and male victims of	Under this proposal there will be no	Emergency accommodation for women

o Qı	uestion	<b>Details</b>		
		domestic abuse placed in emergency accommodation will be fast-tracked to the domestic abuse outreach service.  Housing Options have experience of currently placing women and children fleeing domestic abuse due to no availability at the refuge  Housing Options will support victims to re-connect to areas where they have support networks (where it is safe to do so) to support sustainable independence.  The needs of men fleeing domestic abuse will continue to be met through emergency accommodation. Currently men fleeing domestic abuse are not able to enter refuge accommodation. Therefore the proposal would see an equitable provision of services for men and women, which does not currently occur.	provision of the 'traditional' all inclusive refuge accommodation and support service for women fleeing domestic abuse. This may mean women choose not to flee domestic abuse but stay with their partners.  **There is the potential for an increased risk to safety of service users by any delay in placement due to waiting time for housing appointment.  **There is the potential for an increased risk to safety of service users due to there being no 'traditional' confidential accommodation unit.  **Under the proposals women may not have peer support networks available to them which could lead to feelings of isolation and an increased risk they will return to their partners.  **There are concerns that under the proposals there will be a lack of specialist support available.  ** There is a need for women to be able to move out of area and if priority is given to local people then some women from outside Torbay may be put at greater risk.	fleeing domestic abuse will continue to be provided through the proposed model.
a minority etl (BME) (Pleas	are black or from hnic background se note Gypsies / hin this community)	Under these proposals, women will be matched appropriately to accommodation according to their needs.	**There was a concern raised as part of the consultation that there is a risk that the proposed model would not provide adequate anonymity for women who are	The provision of a service is not affected by ethnicity.  In 2012/13, 25 out of 28 clients placed

Question	Details		
		at risk from honour-based violence and forced marriages.	in described themselves as White.  The remaining 3 clients described their ethnic origin as Mixed: White and Black Caribbean and White Other.
Religion or belief (including lack of belief)	Under these proposals, women will be matched appropriately to accommodation according to their needs.	**There was a concern raised as part of the consultation that there is a risk that the proposed model would not provide adequate anonymity for women who are at risk from honour-based violence and forced marriages.	The provision of a service is not affected by religion or belief.  In 2012/13 the breakdown of clients with regards to religion and belief were:  Not Known: 8  None: 10  Christian:7  Any Other Religion: 3
People who are lesbian, gay or bisexual	None identified at this stage	None identified at this stage	The provision of a service is not affected by sexual orientation.  The breakdown of clients placed in the refuge in 2012/13 was 100% heterosexual.
People who are transgendered	None identified at this stage	None identified at this stage	The provision of a service is not affected by gender/transgender.
People who are in a marriage or civil partnership	None identified at this stage	None identified at this stage	The provision of a service is not affected by marriage/civil partnership.  The breakdown of clients placed in 2012/13 with regards to this group is unknown
Women who are pregnant / on maternity leave	None identified at this stage	None identified at this stage	The provision of a service is not affected by women who are

No	Question	Details		
				pregnant/on maternity leave. The breakdown of clients placed in 2012/13 with regards to this group is unknown
	Socio-economic impacts (Including impact on child poverty issues and deprivation)	None identified	**There is the potential that women who are not able to access a refuge may become homeless.	None identified
	Public Health impacts (How will your proposal impact on the general health of the population of Torbay)	None identified	None identified at this stage	None identified
8.	Cumulative Impacts – Council wide (proposed changes elsewhere which might worsen the	be required to undertake CAADA DASH risk assessments.  ewhere  **Potential impact on other domestic abuse services such as IDVAs, which may see increased demand for the services if		
	impacts identified above)			
8b	Cumulative Impacts – Other public services (proposed changes elsewhere which might worsen the impacts identified above)	**Potential impact on other public serv refuge and the services provided throu	ices such as the police and health services ugh the refuge.	if women are not able to access the

# **Section 3: Mitigating action**

No	Action	<b>Details</b>
9.	Summarise any negative	There is the potential for an increased risk to safety whilst women wait for a housing appointment.
	impacts and how these will	There will be no all inclusive refuge accommodation and support service for women fleeing domestic abuse.
	be managed?	There is the potential for increased risks as there will be no confidential accommodation unit.
		A lack of shared accommodation may lead to feelings of isolation among some women and there is a risk they may return to their partners.
		Children may not have access to the same support which is currently available at the refuge.

 <del>-</del>
Mitigating actions The development of any specifications in relation to domestic abuse services must take into account the findings from the consultation and the considerations outlined in section 6 above to mitigate against any potential negative impacts. Other mitigating actions will include:
<ul> <li>Waiting times for clients fleeing domestic abuse will be monitored by the Housing Options Service.</li> <li>All pre-placement work as per the s184 Duty and undertaking CAADA DASH Risk Assessment (Domestic Abuse risk assessment tool) will ensure Housing Services undertake all placements under a legislative framework.</li> <li>Both male and female victims of domestic abuse placed in emergency accommodation will be fast-tracked to the domestic abuse outreach service</li> <li>Proactive publicity will be undertaken of who to contact in Torbay if fleeing domestic abuse – signposting to most effective service.</li> <li>Safer Communities will provide specialist CAADA DASH training to Housing Officers</li> <li>Safer Communities will monitor risk assessments undertaken for quality.</li> </ul>
Please note the above will be updated once the extended consultation period has closed.

## **Section 4: Monitoring**

No	Action	<b>Details</b>	
10.	Outline plans to monitor the actual impact of your	The impacts of any decision made in relation to domestic abuse services will be monitored in the following ways:	
	proposals	<ul> <li>Monitoring number of referrals to Housing Options Service and outreach services.</li> <li>Monitoring waiting times for clients.</li> <li>Monitoring levels of recorded domestic abuse incidents reports to the police, including repeat incidents.</li> <li>Continued contract monitoring with of domestic abuse services.</li> </ul>	
		Please note the above will be updated once the extended consultation period has closed.	

**Section 5: Recommended course of action** 

No	Action	Outcome	Tick ✓	Reasons/justification for recommended action
11.	State a recommended course of action Clearly identify an option and justify reasons for this decision. The following four outcomes are possible from an assessment (and more than one may apply to a single proposal). Please select from the 4 outcomes and justify the reasons for your decision	Outcome 1: No major change required - EIA has not identified any potential for adverse impact in relation to equalities and all opportunities to promote equality have been taken		
		Outcome 2: Adjustments to remove barriers – Action to remove the barriers identified in relation to equalities have been taken or actions identified to better promote equality		
		Outcome 3: Continue with proposal - Despite having identified some <u>potential</u> for adverse impact / missed opportunities in relation to equalities or to promote equality. Full justification required, especially in relation to equalities, in line with the duty to have 'due regard'.		
		Outcome 4: Stop and rethink – EIA has identified actual or potential unlawful discrimination in relation to equalities or adverse impact has been identified	<b>√</b>	The Domestic Abuse Strategy will be reviewed and all services for victims of domestic abuse (including accommodation and outreach services) will be considered holistically. This review of the strategy will take into account the findings from the consultation and future specifications will be developed in partnership with key stakeholders.