



## Equality Impact Assessment

### What is an Equality Impact Assessment (EIA) and why does the County Council do them?

The [Public Sector Equality Duty](#) (PSED) is an obligation within the [Equality Act 2010](#) ("the Act"), which asks public authorities, like Hampshire County Council, to give 'due regard' to equality considerations, in particular to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

This includes assessing the impact of policies and practices on individuals and communities with a protected characteristic, as defined in the Act and some other specific groups. The County Council uses EIAs to ensure it has paid 'due regard' to equalities considerations when there are changes to a service or policy, a new project or certain decisions.

EIA author	Position & Department	Contact
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Title:	Grants to Tier 2s Authorities to deliver elements of the Whole Housing Approach (WHA)
Related EIAs:	EIA Number: 0269

EIA for Savings Programme:	No
Service affected	Tier 2 Local Authority Housing Services and the provision of domestic abuse services and support at a district/borough level
Description of the service/policy/project/project phase	<p>The Whole Housing Approach (WHA) Grant funding programme will enable Tier 2 local authority housing teams to lead on the development of domestic abuse projects, programmes and services that will support the statutory duty of Tier 2 local authorities and HCC under Part 4 of the Domestic Abuse Act 2021 (DA Act 2021). The Whole Housing Approach is part of the Council's Domestic Abuse Safe Accommodation Strategy (2021-2023). The programme will support Tier 2 local authorities to implement elements of the Whole Housing Approach that will meet their local need, and improve the level, quality and consistency of support and provision of safe accommodation for victims. The Hampshire Domestic Abuse Partnership (HDAP) Board is also advocating the use of the Coordinated Community Response (CCR) to domestic abuse provision and the CCR will be embedded by HDAP as part of its future strategic direction. Tier 2 authorities are key to supporting the CCR approach and this additional grant fund will enable them to support that ambition.</p>
New/changed service/policy/project	<p>The provision of additional funding to Tier 2 local authority housing services will allow them to develop a better domestic abuse response for victims in their local area. Tier 2 housing services will have autonomy to deliver elements of the Whole Housing Approach that will meet their local need and provide additional more direct support to victims. This may take the form of direct payments to support victims to move away from domestic abuse, increase the number and accessibility of dispersed accommodation units, improve access to services for those with protected characteristics and who face multiple disadvantages and improved responses to the management of perpetrators. Tier 2 local authority housing teams will be expected to adopt a Coordinated Community Response to improve the support of domestic abuse victims through better coordination of service provision across housing services, community services and specialist domestic abuse provision.</p>

## Engagement

In 2020 a Safe Accommodation Needs Assessment was conducted which included the mapping of current services and an analysis of various data sources focussed on the provision of domestic abuse safe accommodation across Hampshire. Consultation for this needs assessment included but was not limited to Tier 2 housing data, data from specialist domestic abuse providers, crime data, ambulance data, data from community services. This needs assessment identified gaps in provision and barriers to accessing provision and informed the development of the Hampshire Domestic Abuse Safe Accommodation Strategy 2021-2023. The Needs Assessment and subsequent strategy was developed through consultation with the Hampshire Domestic Abuse Partnership Board and a Safe Accommodation Steering Group was created to continue this consultation process as the strategy began to be implemented.

The Needs Assessment concluded that:

- For residents in Hampshire seeking support the main option for safe accommodation are female only refuges
- There are currently no services specifically for victims with protected characteristics or services led by those that also share the protected characteristic (also known as 'by and for' support).
- Some victims who are facing a multiple disadvantages (e.g. mental health, substance misuse) may find accessing appropriate safe accommodation a challenge and there is a need to improve the current provision to meet their needs.
- Some victims can find accessing current safe accommodation provision difficult, for example victims with No Recourse to Public Funds (NRPF), large families, families with adolescent sons, male victims, including those with children, gay and bisexual men, transgender men.
- There is limited refuge provision for victims with disabilities.
- There is a limited access to dispersed accommodation units and move on provision.

Following the development of the Domestic Abuse Safe Accommodation Strategy, wider consultation has occurred with Tier 2 local authority housing teams, Registered Housing providers and domestic abuse specialist providers. Consultation has also taken place with specialist providers who are expert in this field (e.g. Standing Together) and with other local authorities and key partners who have experience of delivering elements of the Whole Housing Approach. This has provided a wealth of information that has informed the decision to develop this grant offer to allow Tier 2 local authorities the autonomy to deliver elements of the Whole Housing Approach. This grant offer will go some way to addressing the gaps and barriers in service provision for a more diverse population.

## Equalities considerations - Impact Assessment

### Age

Impact on public	Positive
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Impact on staff	Positive
Rationale	<p>In Hampshire, there are estimated to have been 2,079 men and 7,921 women aged over 60 affected by domestic abuse. Data gathered through the Needs Assessment shows only 392 victims who are over 65 being supported in community and safe accommodation services in Hampshire in 2021/22. Age UK report that one in four recorded victims of domestic abuse are over the age of 60. This would suggest that older victims are under represented in services and are not accessing support or safe accommodation. A report by SafeLives suggests that victims aged 61+ are much more likely to experience domestic abuse from adult family members and that older victims are less likely to leave the perpetrator of the abuse. Older victims are also more likely to have a disability. There is also an increased likelihood that older victims are either a carer for the perpetrator or are being cared for by the perpetrator, increasing the barriers for them to leave the relationship and home. Other issues to consider that can increase barriers for victims accessing support are financial dependence, home ownership, generational and cultural considerations.</p> <p>The proposed grant will enable Tier 2 local authorities to provide support to older victims through elements of the Whole Housing Approach. The use of Flexible Funding will allow a bespoke approach to supporting victims in their accommodation or enabling them to secure alternative accommodation. The development of dispersed accommodation units will allow housing teams to address the needs of older victims including any disabilities.</p> <p>There was evidence to suggest that larger families and families with teenage boys face barriers to safe accommodation as they can often not be accommodated in refuge. The focus on dispersed units may go some way to addressing this gap in provision.</p>
Mitigation	

## Disability

Impact on public	Positive
Impact on staff	Neutral
Rationale	<p>Women's Aid report that disabled women are twice as likely to experience domestic abuse than non-disabled women (1995 British Crime Survey) and they are likely to experience abuse over a longer period of time and to suffer more physical injuries as a result of violence. SafeLives report that almost a third (31%) of disabled victims were living with the perpetrator compared to 18% of non-disabled victims. They also report that disabled victims are more likely to report abuse from multiple</p>

perpetrators, 19% for disabled victims as opposed to 6% for non-disabled victims.

Stop Domestic Abuse report that 20% of refuge residents and 15% of community outreach / IDVA clients identify as having a disability. SafeLives estimate that, given that disabled women are twice as likely to experience domestic abuse, the percentage of disabled women represented in services should be nearer 28%.

Stop Domestic Abuse report that 4% of victims with a disability (n=12) were denied access to refuge in the year 2020/21.

There is only one fully adapted bedspace across refuge provision and there is evidence to suggest that, whilst service providers try to be as flexible as possible, this provision is not enough to meet the needs of all victims with a disability.

The provision of grants to Tier 2 local authorities will allow a level of autonomy to address the needs of victims with disabilities in a bespoke way. This will include the provision of Flexible Fund to support victims to remain safely in their own home or move to alternative accommodation. It will also support increased access to dispersed accommodation units that can be adapted to the needs of victims with disabilities.

Mitigation

## Gender Reassignment

Impact on public	Positive
Impact on staff	Neutral
Rationale	<p>The Hampshire Needs Assessment shows that there are very few transgender victims in the community outreach / IDVA service and being supported in safe accommodation. This is reflective of the national picture as SafeLives estimates that only 1% of IDVA-supported victims identify as LGBT+.</p> <p>Hampshire does not have any specialist provision for transgender victims which again is indicative of the national picture. Galop report that there are only six providers nationally delivering LGBT+ specialist support (Birmingham, Brighton,</p>

	<p>London, Manchester, Sheffield). There are no LGBT+ specialist refuges in England and less than 1% of refuges nationally provide specialist support to LGBT+ survivors.</p> <p>In Hampshire, qualitative evidence suggests that trans people are also unable to access women only refuge provision and there are very few transgender victims who approach the local authority housing services for support.</p> <p>The grant being offered will allow Tier 2 housing teams to consider how they can support and work with local specialist organisations to support transgender victims of domestic abuse.</p>
Mitigation	

## Pregnancy and Maternity

Impact on public	Positive
Impact on staff	Neutral
Rationale	<p>National research shows that domestic violence has overtaken gestational diabetes and pre-eclampsia as the leading cause of foetal death. Domestic abuse affects an estimated 1.3 million women each year – 8.2% of the population. Around 30% of domestic abuse begins during pregnancy, while 40–60% of women experiencing domestic abuse are abused during pregnancy (Friend. J (1998), 'Responding to violence against women: a specialist's role', Editorial, Hospital Medicine, September, Vol 59, No. 9, pp 98-99.) Many women are reluctant to involve the criminal justice system because they fear reprisals. If a woman does not have adequate community support to allow her to protect herself, then arrest and prosecution of her assailant may result in more severe violence on their release. Thus it is important for advocacy and housing services to have good liaison with local agencies, including police, social services and solicitors, as each woman's journey to safety may require different tailored interventions. The Hampshire Domestic Abuse Safe Accommodation Needs Assessment highlighted barriers to refuge access particularly for victims with large families, victims with adolescent boys, male victims with children, LGBTQ+ victims with children, victims and children with disabilities, and victims with complex needs who also have children.</p> <p>The grant scheme proposed will allow Tier 2 Authorities to respond to victims in a bespoke way, using the Flexible Fund to support them to move away from abuse and increase their safety, and access alternative safe accommodation when refuge is not available through the development of dispersed housing units.</p>

Mitigation	
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## Race

Impact on public	Positive
Impact on staff	Neutral
Rationale	<p>In the 2020 Safe Accommodation Needs Assessment, the data on ethnicity for refuge residents was relatively comparable to the wider population in terms of estimated prevalence rates for those experiencing domestic abuse from different ethnic backgrounds. However, anecdotal evidence from partner organisations showed that there can be barriers for victims accessing services from different ethnic groups. This can include victims who have NRPF, (especially if they do not have children), victims with English as a second language, lack of recognition and acceptance of domestic abuse within a culture, mistrust of professional bodies, lack of cultural sensitivity, and immigration status. The WHA and CCR models both advocate for a better understanding and response to intersectionality and the impact this will have on victims. The WHA and the DA Act statutory guidance also advocates for the development of appropriate 'by and for' services.</p> <p>The WHA grant will enable Tier 2 authorities to work on a local level with community organisations that support victims from different ethnic backgrounds. Through their local assessment of need they can identify gaps in provision at a local level and potentially use the grant funding to address gaps and barriers.</p>
Mitigation	

## Religion or Belief

Impact on public	Positive
Impact on staff	Neutral
Rationale	<p>The Needs Assessment conducted in 2020 showed that there are some victims in current refuge provision who are experiencing harmful cultural practices such as honour based abuse and female genital mutilation. The commissioned service currently has a post designated to supporting victims in refuge and in the community who have been subjected</p>

	<p>to these practices. There is also anecdotal evidence from the commissioned provider and other partners to suggest that there are barriers within some communities and cultures that prevent victims of domestic abuse from recognising their experiences and seeking help.</p> <p>The grant to Tier 2 authorities will allow them to respond to any local need where appropriate and work more closely with community groups. Where appropriate the grant could be directed to supporting 'by and for' organisations in their response to domestic abuse.</p>
Mitigation	

## Sex

Impact on public	Positive
Impact on staff	Neutral
Rationale	<p>In Hampshire there are estimated to have been 15,607 men and 30,083 women aged 16-59 who have been affected by domestic abuse in the previous year. This contrasts with 1001 men, 6,450 women and 22 transgender people of this age group accessing Hampshire's domestic abuse victims' support service in 2021/22.</p> <p>Fears of homelessness and being forced to live in unsuitable or unsafe housing features as one of the challenges facing female domestic abuse victims. The <a href="#">Safe at Home: Homelessness and Domestic Abuse (Safe Lives Spotlight Report 2018)</a> highlights that:</p> <ul style="list-style-type: none"> <li>• 32% of homeless women said domestic violence contributed to their homelessness.</li> <li>• Over half (52%) domestic abuse victims need support to secure new accommodation or to stay safe in their own home. Without receiving this support at the right time, survivors of domestic abuse can easily become homeless.</li> <li>• Over 10% of those supported with housing were moved out of their local authority area.</li> <li>• After receiving support, survivors of domestic abuse are unlikely to be living in sustainable housing, with 87% of women leaving refuges for continued temporary accommodation according to research by Solace Women's Aid.</li> <li>• Women experience higher rates of repeated victimisation and are much more likely to be seriously hurt or killed than male victims of domestic abuse.</li> </ul> <p>Data suggests that only 4.4% of victims of domestic abuse that are being supported</p>



in domestic abuse services are men. The Hampshire picture reflects this as the data shows that 5% of medium and high risk clients supported from 2019-21 were men.

There is an under representation of male victims nationally and across Hampshire in domestic abuse services and no access to refuge in Hampshire, or across London and the home counties. Mankind reports that half of male victims do not tell anyone they are a victim of domestic abuse and are two and a half times less likely to tell anyone than female victims. They also estimate that around 300 men are sleeping rough because of partner abuse every night.

Tier 2 local authorities will be able to use their grant allocation to support male victims through the Flexible Fund and through the identification of dispersed housing units. For women facing homelessness and additional barriers alongside their experience of domestic abuse, the Flexible Fund and dispersed units may also provide a way of relieving their homelessness and providing bespoke support as an alternative to refuge provision.

Mitigation	
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## Sexual Orientation

Impact on public	Positive
Impact on staff	Neutral
Rationale	<p>In the 2020 Safe Accommodation Needs Assessment, there is a very small number of refuge residents identifying as gay, lesbian or bisexual (data suppressed), across the two reporting years of 2019/20 and 2020/21. Within the population supported by outreach and Community IDVA service, 2% of residents identified as gay, lesbian and bisexual in both reporting years of 2019/20 and 2020/21.</p> <p>Data on the general population, collected by the Office for National Statistics suggest that 2.3% of men and 1.6% of women identify themselves as gay, lesbian or bisexual. The Hampshire Domestic Violence and Abuse Needs Assessment 2018, applies these UK figures to the Hampshire population and assumes that the prevalence of domestic abuse is at least the same as that in the general population. From this it is estimated that at least 544 men and 705 women who identify as gay, lesbian or bisexual would have experienced domestic abuse in 2018.</p> <p>Galop reports the national estimate that more than one in four gay men and lesbian women and more than one in three bisexual people will have been affected by domestic abuse since the age of 16. They also report that gay or bisexual men might be twice as likely to experience domestic abuse compared to heterosexual men. Research conducted by Stonewall also suggests that the prevalence of domestic abuse in men who identify as gay is</p>

	<p>much higher than for men in the general population. For men in the general population around 17% will experience domestic abuse, whereas for gay men this percentage rises to 49%. Galop also suggest that 60-80% of LGBT+ victims have never reported domestic abuse to the Police or sought out advice, support or protection. Therefore, the estimated figure from the 2018 Needs Assessment for gay and bisexual men is very likely to be much lower than given.</p> <p>LGBT+ victims are under-represented across domestic abuse services and the grant to Tier 2 local authorities should allow them to address some of the barriers to access through the use of the Flexible Fund, and identification of opportunities to access dispersed accommodation where there is a barrier to accessing refuge. There is also the potential for the grant to improve a local response to LGBT+ victims by improving access through local community provision.</p>
Mitigation	

## Marriage and Civil Partnership

Impact on public	Positive
Impact on staff	Neutral
Rationale	In the 2020 Safe Accommodation Needs Assessment there was very little evidence gathered around marital status and the impact that this may have on domestic abuse and access to services. However increasing options for service provision is positive for all people regardless of their marital or civil partnership status
Mitigation	

## Poverty

Impact on public	Positive
Impact on staff	Neutral

Rationale	<p><a href="#">Poverty is associated with domestic abuse</a> as both a cause and a consequence. It prolongs women's exposure to abuse by reducing their ability to leave and it makes women poorer on leaving the relationship. Poorer households show higher rates of domestic abuse. Women in households with low incomes <a href="#">are 3.5 times more likely</a> to experience domestic violence than women in slightly better-off households. <a href="#">Disabled women</a> have even fewer resources due to their lower rates of employment and wider gender pay gaps compared to disabled and non-disabled men. Disabled women will face <a href="#">additional barriers to leave</a> due to inaccessible services, transport and available adapted homes, but also because their abusive partner is often their carer. Many migrant women have what's called 'no recourse to public funds' (NRPF). This means they cannot use the social security, housing or women's refuge services available to other women. Women with no recourse to public funds by virtue of their migration status are a group that is economically very vulnerable to domestic abuse. Their options on leaving are even worse than for other women, as they can't access benefits and only a reduced number of refuges and shelters can accommodate them.</p> <p>The grant offer can be used for a Flexible Fund which can be used in a bespoke way for victims to reduce the barriers to them in accessing services and moving away from the abuse. It is a low barrier funding pot that can be used to alleviate financial barriers for victims which will allow them to access safe accommodation. For women with NRPF the Flexible Fund can be used to fund emergency accommodation to prevent them becoming homeless where there is no eligibility through the local authority, and can also be used to pay for basic needs where this cannot be sourced in alternative ways (such as travel, clothing, food).</p>
Mitigation	

## Rurality

Impact on public	Positive
Impact on staff	Neutral
Rationale	<p>It is recognised that in rural communities nationally and in Hampshire victims are more vulnerable to domestic abuse.</p> <p>For many victims in rural areas, their nearest specialist can be up to two bus-rides away from their home. If the partner controls access to a car, denies the victim petrol money, checks the victim's mileage, or demands an explanation every time the victim leaves home, that distance can mean a victim is unable to get to a specialist support worker.</p> <p>Similarly, in a small community where a new vehicle would be noticed, a victim cannot be safely visited by a support worker on a regular basis, in case the perpetrator is informed that a strange car has been seen at their home.</p>

	<p>The grant can be used for a Flexible Funding pot that is a low barrier, bespoke fund to support victims and reduce the barriers to accessing services. A victim who is facing access to barriers because they live in a rural location may be able to access Flexible Funding through the housing services to facilitate contact with support services.</p>
Mitigation	

Geographical Impact: All Hampshire

## Equality Statement

### Additional information:

The Domestic Abuse team at HCC are currently working with Tier 2 Housing Teams to improve the quality of data that they record on victims experiencing domestic abuse who use the housing service. We are also working with them to have a specialist domestic abuse worker within the housing teams. In addition we are encouraging the Tier 2 Housing teams to apply for other grant funding that will enable them to follow a process of accreditation awarded by the Domestic Abuse Housing Alliance (DAHA). There are standards within this DAHA accreditation that will improve data collection methods and reporting mechanisms. There will be some requirements to report back to HCC against agreed criteria when the Tier 2 Housing Teams take up the grant offer to deliver the WHA. Within all of this we intend to have base line measures, include demographic data that reports against protected characteristics, and include outcome measures. All of this will allow us to monitor the impact of the elements of WHA that are delivered by the Tier 2 authorities and review the positive impact in terms of equality against all areas identified in this impact assessment.

### Overview Statement:

A summary assessment to show that due regard to the Public Sector Equality Duty has been paid, which is undertaken when a full EIA is not needed:

EIA reference number: 00356

Date of production of EIA for publication: 16/03/2023