



Equality Impact Assessments

Full Impact Assessment Form

1. What is the service area(s) and who is the lead officer?

Strategic Housing

Duncan Hall, Assistant Director – Regeneration, Housing and Place.

Nikki Patton, Strategic Housing Manager

Domestic Abuse 'Safe in Accommodation Strategy' for Norfolk 2021-2024

The Domestic Abuse Bill was passed and became an Act in law on 29th April 2021. The Act will help transform the response to Domestic Abuse, helping to prevent offending, protect victim-survivors and ensure they and their children have safe accommodation and support when they need it. The Act includes within Part 4 (Sections 57-61) new duties on Tier 1 local authorities (County Council) in England relating to the provision of support for victims and their children residing within relevant safe accommodation and a duty on Tier 2 authorities (Borough Council) to co-operate with Tier 1 authorities.

Domestic Abuse is a leading cause of homelessness for adult and child victim-survivors. The Safe in Accommodation Strategy for Norfolk 2021-2024 outlines how Norfolk County Council, as a Tier 1 authority, will work with Tier 2 authorities (Borough Council), and key stakeholders (including victim-survivors) to meet the new duties to provide support in safe accommodation for both adults and children in Norfolk

To deliver this duty, tier 1 local authorities must carry out a needs assessment and develop and publish a strategy. The 'Safe in Accommodation Strategy for Norfolk 2021 -2024 is in response to this new duty on Norfolk County Council (NCC) as a Tier 1 authority and in particular to Part 4 of the Act: Safe Accommodation and Support.

Equality considerations have been at the heart of the strategy, due to one of the goals of the legislation being the improvement of accommodation outcomes for people with protected characteristics. While Domestic Abuse impacts on all people, the nature of an individual's protected characteristics can influence how they experience it, and indeed their needs when accessing safe accommodation. It is well documented that people with protected characteristics can experience unique barriers when seeking help or accessing services. The strategy attempts to provide a more bespoke service to these individuals who may struggle to access the right support.

For example, men make up 28% of all referrals to Domestic Abuse services, yet there is currently no accommodation provision for male victim-survivors. It is also expected that there is an under-recording of demand due to the local crime stats. Similarly, LGBT+ groups are poorly represented in the data, and it is recognised that many Domestic Abuse providers do not routinely collect equalities data. These are identified as gaps in the strategy, and NCC will seek to address them in working with Tier 2 authorities and partners.

2. What change are you proposing?

Domestic abuse affects tens of thousands of people every year in Norfolk. The scale of the problem combined with the impact it has on people makes domestic abuse a priority for everyone. The multi-agency response to domestic abuse requires working in communities to respond to and prevent abuse, ensuring the right safeguarding is in place to protect people and an effective criminal justice response that support victims and survivors and actively tackle perpetrator behaviours. To ensure that the domestic abuse response in Norfolk is as joined up as possible, the Norfolk County Community Safety Partnership's (NCCSP) Domestic Abuse and Sexual Violence Delivery Group (DASVG), the Norfolk and Suffolk Criminal Justice Board (NSCJB), the Norfolk Safeguarding Adults Board (NSAB) and the Norfolk Safeguarding Children Partnership (NSCP) have collaborated to create a joined-up strategy, responding to domestic abuse in the safeguarding and criminal justice for Norfolk.

This strategy provides a framework which will enable join up between the strategic partnerships, setting out how we will work together to tackle domestic abuse. In recognition that a significant proportion of sexual violence is linked to domestic abuse, this strategy is closely aligned to the DASVG Sexual Violence Strategy. At the heart of the strategy is a commitment to follow evidence led, public health response to preventing domestic abuse. This strategy will seek to address adult and child domestic abuse victimisation and perpetration.

To do this there are five priorities in its response:

1. Improved partnership understanding
2. Putting authentic voice at the heart of our response
3. Supporting victims and survivors and responding to perpetrators
4. Early identification and early help
5. Changing attitudes

The partnerships understand their circle of influence in responding to risk and protective factors relating to domestic abuse set out in Figure 1. The partnerships will use their available influence to deliver this strategy.

The proposed change is to endorse Norfolk County Council's Safe in Accommodation Strategy for Norfolk 2021-2024.

Endorsement of the Strategy by the Councils Cabinet is necessary as it will inform the Councils Homelessness & Rough Sleeper Strategy 2019-2024 and approaches to wider areas of work in relation to Domestic Abuse. It will also ensure that the Council is fulfilling its role in supporting victim-survivors of domestic abuse.

3. How will this change help the council achieve its corporate business plan objectives (and therefore your Directorate/service objectives)?

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4. What is your evidence of need for change?

The Support in Safe Accommodation Strategy for Norfolk 2021–2024 outlines how Norfolk County Council will implement the statutory duties associated with the provision of safe accommodation, as required by the Domestic Abuse Act 2021 (“the Act”). The purpose of the Act is: -

- To protect and support victim-survivors’ and their families; transform the justice process to prioritise victim-survivors’ safety and provide an effective response to perpetrators; and to drive consistency and better performance in the response to Domestic Abuse (DA) across all local areas, agencies, and sectors.
- Recognising the devastating impact on victim-survivors of all genders, and children of DA - and introduces a statutory duty on Tier 1 authorities to assess and meet support needs in safe accommodation

This strategy will primarily impact on people with the following protected characteristics, though it may not be limited to individuals in these categories, sex, sexual orientation, people with disabilities, race, age.

This includes residents and service users with a range of protected characteristics, in relation to disability, sex, gender reassignment, marital or civil partner status, pregnancy and maternity, race, religion/belief, age and sexual orientation.

The Strategy gives specific regard to the needs assessment and identifies gaps for improvement, many of these areas for improvement are associated with providing a better service for people with protected characteristics as mentioned above.

The potential impact of this strategy is likely to be an improvement on the status-quo for people with protected characteristics accessing safe accommodation. The reason for this is the addressing of identified gaps (based on the needs assessment) through actions which NCC and partners will take to improve life for people with protected characteristics.

5. How will this change deliver improved value for money and/or release efficiency savings?

The 5 core objectives of the Strategy: -

1. Increase the amount and flexibility of safe accommodation
2. Improve engagement with victim-survivors of DA
3. Improve the quality of support and safe accommodation
4. Support children in safe accommodation
5. Improved intelligence

The Strategy outlines how all agencies will work collaboratively to provide victim-survivors with a range of flexible options, that enable them to remain safe at home or access suitable alternative safe accommodation and support if that is what is needed and wanted. Whilst the Borough Council will support all of the objectives of the Strategy, objectives 1,3 and 5 are areas that the Council will have particular input in. In recent months one new woman's refuge has been provided and work is under way to provide a further two self-contained safe accommodation units. We are working closely with NCC and a specialist domestic abuse support provider to deliver these. The units are in response to the accommodation needs identified in the needs assessment specifically in relation to broadening the accommodation offer beyond refuge.

6. What geographical area does this proposal cover?

This strategy covers the county of Norfolk, all seven districts in conjunction with Norfolk County Council will be committed to delivering and supporting the rollout of the strategy.

7. What is the impact of your proposal?

Based on the evidence available, this proposal is likely to have a positive impact on the people with protected characteristics mentioned above as compared to people who do not share these characteristics in the same way.

This is because people with protected characteristics commonly experience barriers to services and information, such as finding safe accommodation. The Safe Accommodation Strategy for Norfolk aims to address those barriers and provide a more bespoke service for people with protected characteristics whilst ensuring that safe accommodation is appropriate for the individual and any complex needs they may have.

8. What data have you used to support your assessment of the impact of your proposal?

DLUHC published clear guidance on the scope of the Needs Assessment – it is comprehensive including: -

- Local population make up, including DA prevalence.
- Safe accommodation mapping.
- Identification of victim-survivors and referrals, including understanding their journeys into safe accommodation.
- Demand for, and barriers in accessing support within DA safe accommodation.
- Housing options.
- Victim-survivor experiences.

NODA were commissioned by Norfolk County Council to undertake a needs assessment. They gathered data at a national and local level including: -

- Crime Survey data.
- Multi-Agency Risk Assessment Conference (“MARAC”) data.
- National police DA incident and crime data.
- Local police crime data.
- Housing/Homelessness Case Level Collection (“H-CLIC”) data.
- Accommodation and support data.
- Published research.

9. What consultation has been undertaken/will need to be undertaken with stakeholders/ groups directly or indirectly impacted by the proposals and how do you intend to use this information to inform the decision?

This strategy has been produced by Norfolk County Council through the Norfolk Domestic Abuse Partnership Board (NDAPB) with oversight of its Council Members as well as the Domestic Abuse & Sexual Violence Group. The strategy has also received support from the Norfolk Community Safety Partnership Board whose remit is to create safer communities through the reduction of crime and the promotion of safety.

10. Are there any implications for other service areas?

No – the only service area affected are homelessness services (Housing Options Service). The Domestic Abuse Act 2021 amends the Housing Act 1996, part 7 to define victims-survivors of domestic abuse as having an automatic 'priority need' for accommodation whereas before the Act a victim-survivor would need to have also been vulnerable.

11. What impact (either positive or negative) will this change have on different groups of the population?

Based on the evidence available, this proposal is likely to have a positive impact on the people with protected characteristics mentioned above as compared to people who do not share these characteristics in the same way.

This is because people with protected characteristics commonly experience barriers to services and information, such as finding safe accommodation. This Safer Accommodation Strategy for Norfolk aims to address those barriers and provide a more bespoke service for people with protected characteristics whilst ensuring that safe accommodation is appropriate for the individual and any complex needs they may have.

Different protected characteristics will mean there are different impacts for how individuals experience Domestic Abuse (DA) and in turn, their needs for safe accommodation. These are set out below: -

- Age – the vast majority of victim-survivors are aged 18-59 as mentioned above. Individuals who are 16-18 or 60+ who experience DA may not feel that offered accommodation is appropriate and be hesitant to come forward to access support. The strategy outlines a gap that older age groups may be underreported in statistics due to the way crime statistics are taken.
- Sex – with roughly 2/3 of DA victim-survivors being female, there is a gap in current provision in that no male accommodation is provided. The strategy will seek to address this and will ensure that female victim-survivors are offered appropriate accommodation.
- Sexual Orientation – the strategy makes a commitment to improve data recording of LGBT+ victim-survivors as this has been identified as a gap, with concerns that LGBT+ victim-survivors are underrepresented in survivor information.
- Disability – currently, most safe accommodation is not accessible to people with disabilities. The strategy outlines an ambition to make these accommodation sites more accessible for people with disabilities and older victim-survivors.
- Race – Following an Accommodation Needs Assessment evidence shows that most victim-survivors receiving support in safe accommodation in Norfolk are white. However, as our intelligence improves, we will act on any findings that shows any victim-survivor with protected characteristics can receive support in safe accommodation by increasing the amount of flexible safe accommodation which is a key delivery action within the Support in Safe Accommodation strategy.

The Strategy gives specific regard to the needs assessment and identifies gaps for improvement, many of these areas for improvement are associated with providing a better service for people with protected characteristics as mentioned above.

The potential impact of this strategy is likely to be an improvement on the status-quo for people with protected characteristics accessing safe accommodation. The reason for this is the addressing of identified gaps (based on the needs assessment) through actions which NCC and partners will take to improve life for people with protected characteristics.

12. What actions could be taken to mitigate the adverse impacts identified in question 11? Please clearly state if any actions cannot be mitigated

The impact of the strategy is positive on all groups of the population.

13. How will you monitor the impact of this change?

The impact of the strategy will be monitored by Norfolk County Council who will collate data from districts, partners and commissioned Domestic Abuse Services. Norfolk County Council will also provide data to DLUHC who are monitoring the impact of the new duties placed on Tier 1 authorities through the Domestic Abuse Act 2021.

14. Other Staff Involved in Assessment (including Corporate Equality Group Representatives), and comments from Equality Work Group Reps

Assessment Completed By: Ross Hefford

Job Title: Housing Options Manager

Date: 7th June 2022