

Equality Impact Analysis Template

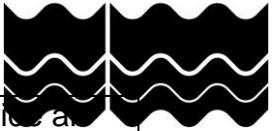
Equality Impact Analysis (EqIA) (or Equality Impact Assessment) aims to make services and public policy better for all service-users and staff and supports value for money by getting council services right first time.

We use EqIAs to enable us to consider all relevant information from an Equality requirements perspective when procuring or restructuring a service, or introducing a new policy or strategy. This analysis of impacts is then reflected in the relevant action plan to get the best outcomes for the Council, its staff and service-users¹.

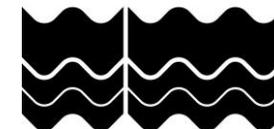
EqIAs are used to analyse and assess how the Council's work might impact differently on different groups of people². EqIAs help the Council to make good decisions for its service-users, staff and residents and provide evidence that those decision conform with the Council's obligations under the Equality Act 2010³.

This template sets out the steps you need to take to complete an EqIA for your project. Guidance for sections is in the end-notes. If you have any questions about your EqIA and/or how to complete this form, please use the contact details at the end of this form.

Title of Project/Service/Policy⁴	Pan-Sussex Strategy for Domestic Abuse Accomodation and Support
Team/Department⁵	ESCC Adult Social Care and Health
Directorate	Planning, Performance and Engagement
Provide a comprehensive description of your Project (Service/Policy, etc.) including its Purpose and Scope⁶	<p>In the Domestic Abuse Act 2021, the Government has committed to transforming the way we respond to domestic abuse. Under Part 4 of the new Act, Brighton & Hove City Council, East Sussex County Council and West Sussex County Council (known as Tier One authorities), now have a legal duty to support victims of domestic abuse and their children living in refuges and other safe accommodation. Tier One authorities have been given funding for 2021-22 to enable them to meet this new requirement, along with an indication that further funding will follow.</p> <p>Working with a range of key stakeholders, professionals, service providers and survivors, a Sussex-wide needs assessment was completed to assess the current provision and to help identify gaps and opportunities for improving the offer.</p>



	<p>The purpose of this Strategy is to outline the findings of the needs assessment and provide an overview of the local authorities' commitments to improving access and increasing options for those in need of support. In Sussex, we will continue to assess and test established practice and look for opportunities to develop our understanding of ever-evolving needs, to be able to support our communities. This Equality Impact Assessment is focused on outcomes and consultation feedback in East Sussex alone.</p>
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Initial assessment of whether your project requires an EqIA

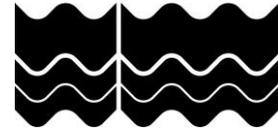
When answering these questions, please keep in mind all legally protected equality characteristics (sex/gender, gender reassignment, religion or belief, age, disability, ethnicity/race, sexual orientation, marriage/civil partnership, pregnancy and maternity) of the people actually or potentially receiving and benefiting from the services or the policy.

In particular consider whether there are any potential equality related barriers that people may experience when getting to know about, accessing or receiving the service or the policy to be introduced or changed.

Discuss the results of your Equality assessment with the Equality Lead for your department and agree whether improvements or changes need to be made to any aspect of your Project.

	Question	Yes	No	Don't Know
1	Is there evidence of different needs, experiences, issues or priorities on the basis of the equality characteristics (listed below) in relation to the service or policy/strategy area?	x		
2	Are there any proposed changes in the service/policy that may affect how services are run and/or used or the ways the policy will impact different groups?	x		
3	Are there any proposed changes in the service/policy that may affect service-users/staff/residents directly?	x		
4	Is there potential for, or evidence that, the service/policy may adversely affect inclusiveness or harm good relations between different groups of people?	x		
5	Is there any potential for, or evidence that any part of the service/aspects of the policy could have a direct or indirect discriminatory effect on service-users/staff/residents ?			x
6	Is there any stakeholder (Council staff, residents, trade unions, service-users, VCSE organisations) concerned about actual, potential, or perceived discrimination/unequal treatment in the service or the Policy on the basis of the equality characteristics set out above that may lead to taking legal action against the Council?			x
7	Is there any evidence or indication of higher or lower uptake of the service by, or the impact of the policy on, people who share the equality characteristics set out above?			x

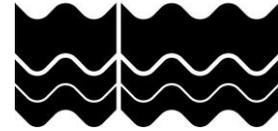
If you have answered “YES” or “DON'T KNOW” to any of the questions above, then the completion of an EqIA is necessary.



The need for an EqIA will depend on:

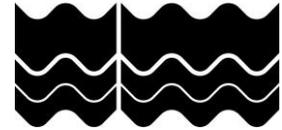
- How many questions you have answered “yes”, or “don’t know” to;
- The likelihood of the Council facing legal action in relation to the effects of service or the policy may have on groups sharing protected characteristics; and
- The likelihood of adverse publicity and reputational damage for the Council.

Low risk	Medium risk	High risk
	The Domestic Abuse Strategy needs an Equality Impact Assessment to be completed.	



1. Update on previous EqlAs and outcomes of previous actions (if applicable)⁷

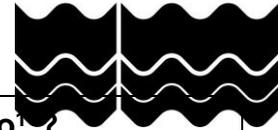
What actions did you plan last time? (List them from the previous EqlA)	What improved as a result? What outcomes have these actions achieved?	What <u>further</u> actions do you need to take? (add these to the Action Plan below)
New strategy so no previous EqlA.		



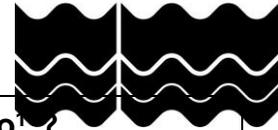
2. Review of information, equality analysis and potential actions

Consider the actual or potential impact of your project (service, or policy) against each of the equality characteristics.

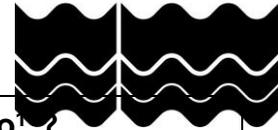
Protected characteristics groups under the Equality Act 2010	What do you know ⁸ ? Summary of data about your service-users and/or staff	What do people tell you ⁹ ? Summary of service-user and/or staff feedback	What does this mean ¹⁰ ? Impacts identified from data and feedback (actual and potential)	What can you do ¹¹ ? All potential actions to: • advance equality of opportunity, • eliminate discrimination, and • foster good relations
Age ¹²	<p>East Sussex The overall population of East Sussex is estimated to be 552,259. East Sussex has a notably older population compared to England with 26% of people aged 65 years and over compared to 18.4% for England. Average age distribution for East Sussex is: 0-19 years: 21% 20-64 years: 53% 65-84 years: 22% 85+ years: 4%.</p> <p>Pan Sussex Victims/survivors aged 16-25 represented 19% of all Sussex Police domestic</p>	<p>Provisions for larger families are limited. The largest number of refuge rooms have two beds (29 rooms, 32.6%). Only eight rooms in Sussex refuges have four beds and no rooms in Sussex have five or more beds.</p> <p>There were 117 children and young people (CYP) living in Sussex refuges during 2020-21. Only four refuges have dedicated CYP workers. East Sussex refuges are lacking this kind of specialist support.</p>	<p>A lack of provisions for larger families may place victims/survivors including children at increased risk.</p> <p>Young adult victims/survivors (16-25) may face specific experiences of domestic abuse, including digital abuse and coercive control using technology. Younger people are also less likely to understand their experiences as domestic abuse and</p>	<p>Stakeholders working with a range of different age groups have been consulted and the consultation survey has been shared through various channels in order to reach a broad range of age groups in the community, including making paper copies available for groups who are digitally excluded.</p> <p>Recommendations: -Specialist support for children and young people, including 16/17-year-old victim/ survivors accommodated in self-contained units, as per the service specification for East Sussex refuges</p>



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	<p>abuse incidents in 2020-2021.</p> <p>People aged over 65 represent 25% of the Sussex population, but only 6% of police domestic abuse incidents. In 2020-21, 260 people aged 65 and over were referred to Adult Social Care services across Sussex due to domestic abuse. Only 5 people aged over 65 were living in Sussex refuges in 2020-21.</p> <p>England and Wales According to ONS in England and Wales in the year ending March 2021, the highest proportion of female victims of violence against the person offences, identified as domestic abuse-related, were aged 30 to 34 years, whereas male victims were generally</p>	<p>During interviews with survivors, refuge residents shared that there were not enough suitable provisions for children, including toys and garden equipment. Children at one refuge said that having a good Wi-Fi connection was an important feature for them.</p> <p>Two key priority recommendations from the East Sussex strategy consultation are to provide more accommodation for women with children and to provide dedicated, personalised and holistic support for children and young people.</p> <p>A specialist service for older people advised that</p>	<p>may be less willing to seek support, than adult victims/survivors.</p> <p>Older people are not accessing refuges in Sussex and are more likely to be digitally excluded. Older people may not believe services are appropriate for them and may not recognise their situation as abusive.</p>	<p>-Increase of safe accommodation provision for larger families -Commissioners to work with providers to increase the diversity of accommodation options available for women with children, including the additional units required within the refuge service specifications -Specialist support to be given to children and young people to include but not limited to play therapy, wellbeing services, a holistic and trauma informed approach</p> <p>-ESCC to have dedicated CYP workers within refuge and safe accommodation in meeting the recommendations in the strategy consultation and in response to the DA Act 2021 draft statutory guidance framework, which highlights this as good practice</p>

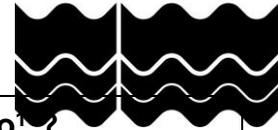


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	<p>older with the highest proportion of victims aged 75 years and over.</p> <p>According to ONS research, over 10% of the population do not use the internet, 75% of that group are aged over 65.</p> <p>SafeLives data highlights older people taking on average twice as long to seek help and being significantly more likely to have a disability than victims aged under 60. Age UK reports that this forces older people to stay in abusive relationships, with the only alternative option to specially adapted housing being adapted mainstream and residential care which is also in short supply and may not</p>	<p>very few domestic abuse safe accommodation and support providers have specific policies for older people.</p>		<p>in meeting the needs of CYP experiencing domestic abuse.</p> <p>-Offers of support and promotion of services for victims should be tailored more directly to older people in East Sussex, including more generic language, broader promotion of support, linking in with other support services and targeted training for front-line professionals who routinely come into contact with older.</p> <p>- East Sussex refuge service to link in with Hourglass, who have been commissioned to provide specialist IDVA support for older people who are victims of domestic abuse, to develop targeted promotional material and comms for the Service to older people.</p> <p>- Refuge service to proactively promote the Service to older people (and other marginalised</p>

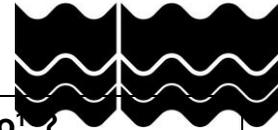


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	always be appropriate to level of needs.			groups) within local communities, including but not limited to community leaders, local GP practices, pharmacies, community groups, voluntary groups, and private and independent sector care providers, including nursing and residential care homes, and develop partnership working. -CGL, including Housing Options IDVAs and refuge service to work collaboratively with Hourglass to develop a specific policy for older people who are victims of domestic abuse and best practice guidance, with reference to SafeLives Older people's care / referral pathway for victims of domestic abuse ¹

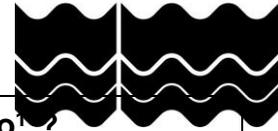
¹ <https://safelives.org.uk/sites/default/files/resources/Older%20peoples%20Care%20pathway%20guidance%20notes.pdf>



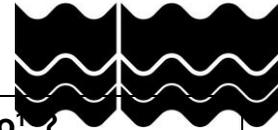
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Disability¹³	<p>East Sussex</p> <p>Local projections suggest that by 2032 there will be over 130,000 people with a disability in East Sussex. In the 2011 census, 107,145 people were living with a long-term health problem or disability in East Sussex – 20% of the total population (ONS census 2011). In the general population of East Sussex, 17.5% of people have long term health problems and disabilities. In the service specific data provided by the current service provider, the number of clients who have a long-term disability or condition was 35%.</p> <p>Mental health conditions - For the period 1/1/2020-31/12/2021, within the East Sussex Refuge over 45% of</p>	<p>Two safe accommodation facilities in East Sussex do not have wheelchair access or any other kind of disability support, including specialist equipment for deaf people.</p>	<p>Support for disabled people accessing domestic abuse services and support needs to be improved.</p>	<p>The consultation is being made available in accessible versions such as BSL and Easy Read.</p> <p>-Support for disabled victims/survivors in safe accommodation to be improved, by introducing multi-agency in-reach teams where needed, developing new facilities, or adapting existing facilities as appropriate and installing visual fire alarms to assist deaf people.</p> <p>-Housing application processes to be in-person, if this is the person's preference and accessible for those with SEND or SLCN and include interpretation for a range of languages, including British Sign Language.</p> <p>- East Sussex refuge service to continue to proactively engage</p>



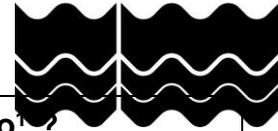
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	<p>clients stated that they had a mental health condition. This is significantly higher than within the wider population, which is approximately 25%.</p> <p>Pan Sussex People with disabilities represented 10% of police domestic abuse incidents in 2020-21. Data for disabled people living in Sussex safe accommodation was limited.</p>			<p>with ESCC funded trauma-informed specialist ‘virtual team’ including mental health specialists, along with substance misuse, employability, and move on specialists, to support staff (and any volunteers) working in refuges.</p> <p>This will increase support for victims with mental ill health as part of a holistic approach for those with mental ill health and multiple complex needs, support a trauma informed approach and improve outcomes for victims’ emotional wellbeing.</p>
Gender reassignment¹⁴	<p>Pan Sussex Non-binary and transgender people represented 0.02% and 0.11% of police domestic abuse incidents respectively.</p>	<p>There were differing views on single sex safe accommodation and trans inclusivity in the feedback on the strategy consultation, with some respondents arguing for single sex safe</p>	<p>Shared facilities can be a major barrier to accessing or settling into refuge.</p> <p>Access to services for trans people to refuge and other domestic</p>	<p>The Equality Act 2010 protects trans people from discrimination. It also allows service providers to restrict access to single sex spaces on the basis of biological sex if there is a clear justification. The Gender Recognition Act does not currently allow a legal change in</p>



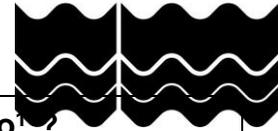
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		<p>accommodation provision and others that safe accommodation needs to inclusive of trans women.</p> <p>In the engagement with LGBT organisations and those with lived experience as part of the recommission for domestic abuse services in 2018, there was a call for all services to make a clear joint declaration of full inclusion to all Domestic and Sexual Violence services and a call to make this clear and unequivocal. Participants asked that Trans inclusion be a requirement in future commissioning of DVA/SVA services and a key part of new strategy development. It was also</p>	<p>abuse services needs to improve.</p>	<p>gender on the basis of self-identification alone. ESCC are committed to supporting victims/survivors in the trans community and will risk assess on a case-by-case basis which setting is most suitable to support trans victims/survivors. Trans people may experience additional barriers to reporting abuse, and as a minority group it is essential that service provision recognises the needs of those with this protected characteristic and that service provision can be tailored to address the experiences and requirements of transgender people. This is recognised within the strategy.</p> <p>Significant barriers exist in trans people reporting abuse and accessing accommodation-based services. For trans men or non-binary people their gender identity may prove an additional</p>



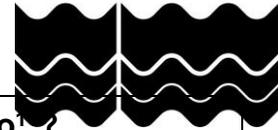
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		reflected that it was important to address the perception of trans/non-binary service availability as well as the actual provision available.		barrier for reporting, believing that support services are only available to women. We are working with our contracted refuge provider in ensuring that media and communications to publicise the universality of access for a range of safe accommodation options exist for trans people accessing domestic abuse services in East Sussex. Each person referred to refuge will be assessed and the right type of accommodation will be sourced for them. The provider is required to offer single sex accommodation in multi-occupancy buildings and is therefore introducing self-contained refuge provision, this is anticipated to be from April 2022. It should be noted that the provider will not always know whether someone is trans if they



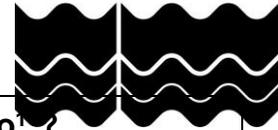
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				choose not to declare this at the point of referral. -Further engagement work with the trans community, services and organisations that support and advocate for the trans community, and engagement with those with lived experience of domestic abuse to explore preferred options for trans women who are victims/survivors in safe accommodation. -Dispersed accommodation to be explored as safe accommodation for trans women and men. -Safe accommodation to be promoted as trans inclusive as appropriate.



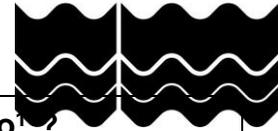
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Pregnancy and maternity¹⁵	<p>Current numbers of pregnant women accessing the service are skewed as there is currently a pause on referrals into the service and so there are a number of voids; currently there two pregnant women within East Sussex refuges.</p> <p>In 2017/18 there were 20 pregnant women within East Sussex refuges, equivalent to 15.4% of clients who accessed East Sussex refuge accommodation and support.</p> <p>Nationally, nearly 60% of survivors using domestic abuse services are mothers and 1 in 15 are pregnant, according to the Women's Aid report, March 2019.</p>	<p>There has been no feedback on this protected characteristic within the strategy consultation.</p> <p>We are aware that this is a time of increased risk for women and support needs to be provided to ensure their emotional wellbeing and physical health.</p> <p>As part of the service user tender evaluation for refuge provision in East Sussex, people fed back that there is a need to ensure that there is provision for pregnant women with children to have access to childcare to attend medical appointments.</p>	<p>Pregnant women need additional support in safe accommodation. This includes child care for pregnant women with children and additional support with their emotional wellbeing and support with health appointments etc. as well as care and support post-natally.</p>	<p>-Safe accommodation providers to capture and report on clients that are pregnant within contract monitoring. This wasn't previously captured within refuge contract monitoring but has been incorporated into the KPIs of the refuge contract with Clarion Housing from 1st November 2021.</p> <p>-Safe accommodation providers ensure child care is available for pregnant women with children and any additional support required to ensure their emotional wellbeing and physical health.</p>



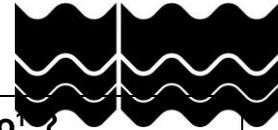
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Race/ethnicity <small>16</small> Including migrants, refugees and asylum seekers	<p>East Sussex 91.7% of the county's population identified as White British, compared to the regional average of 85.2% and the national average of 80.5%.</p> <p>Pan Sussex 77.1% of victims/survivors in safe accommodation in Sussex identified as white. 9.1% identified as Black or Black British. 5.8% identified as Mixed or multiple ethnic groups 5.1% identified as Asian or Asian British 2.5% identified as "Other" 0.4% identified as Gypsy, Roma and Traveller (GRT). 15% of national domestic abuse helpline calls to Friends, Families and Travellers (a national organisation advocating for GRT</p>	<p>There is no specialist safe accommodation for Black and minoritised women in Sussex, although there is a new specialist service, Hersana, being established in Sussex, based in Crawley. Six safe accommodation providers in Sussex can accept women with no recourse to public funds (NRPF).</p>	<p>Shared facilities were frequently named as a reason that victims/survivors do not access or maintain their stay in refuge.</p> <p>Cultural differences from other residents, for instance, Gypsy, Roma and Traveller (GRT) backgrounds, shared facilities can be a major barrier to accessing or settling into refuge.</p>	<p>-Commissioners, refuge and safe accommodation providers to link with Hersana to explore options for providing specialist in-reach and/or specialist IDVA consultation to staff and professionals from referring agencies to support victims from minoritised ethnic groups.</p> <p>-Cultural awareness and immigration rights awareness training to be increased for frontline staff and commissioners to better understand the needs of various marginalised groups, including those with No Recourse to Public Funds and Gypsy, Roma and Traveller communities. Training packages must acknowledge the intersection of race, class and gender.</p>



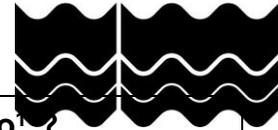
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	communities) come from Sussex.			
Religion or belief¹⁷	There is a slightly lower proportion of women with no religion (23%) in East Sussex than in the general population (29%). There is also a high proportion where religion is not known, 42%, which is significantly higher than the county general population (8%).	There is no feedback on this within the ESCC strategy consultation.	We will continue to work with our refuge and services providers to monitor data on religion and belief of our service users.	Better awareness for different needs of people according to their religious backgrounds, , e.g. separate storage spaces for halal food and community links to practice faith. Staff training on cultural awareness and immigration rights, exploring the intersectionality of race, class and gender for staff within safe accommodation services.
Sex/Gender¹⁸	East Sussex 52% of the county's population was estimated to be female and 48% male, similar to the national split (2011 Census).	There is no specialist male safe accommodation in Sussex or the South East.	Funding for current and future services for women and girls must be sustainable, long-term and independent from the funding for the other	We will explore options for the provision of specialist, dispersed and self-contained units of safe accommodation that can



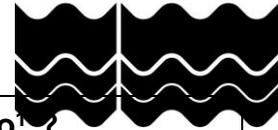
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	<p>Pan Sussex In 2020-21, women represented 71% of police domestic abuse incidents, reflecting the gendered nature of domestic abuse.</p> <p>In 2020-21, men represented 29% of police domestic abuse incidents.</p> <p>England and Wales According to ONS in England and Wales in the year ending March 2021, the highest proportion of female victims of violence against the person offences, identified as domestic abuse-related, were aged 30 to 34 years, whereas male victims were generally older with the highest proportion of victims aged 75 years and over.</p>	<p>Some feedback received suggests that women need single-sex provision in order to feel safe in refuge and supported accommodation, highlighting that the single sex exemption within the Equality Act allows for this. This contrasts with other feedback received that safe accommodation needs to be inclusive of trans women.</p>	<p>specialist services identified within this Strategy. The needs of women and girls must continue to be met alongside the needs of other groups for whom services are currently lacking.</p> <p>The need for domestic abuse services and safe accommodation needs to be monitored for men and non-binary people.</p>	<p>accommodate male victims/survivors of domestic abuse.</p> <p>Each person referred to refuge will be assessed and the right type of accommodation will be sourced for them. The provider is required to offer single sex accommodation in multi-occupancy buildings and is therefore introducing self-contained refuge provision, it is anticipated that this will be from April 2022.</p>



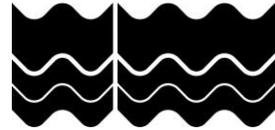
Protected characteristics groups under the Equality Act 2010	What do you know⁸? Summary of data about your service-users and/or staff	What do people tell you⁹? Summary of service-user and/or staff feedback	What does this mean¹⁰? Impacts identified from data and feedback (actual and potential)	What can you do¹¹? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
Sexual orientation¹⁹	<p>Pan Sussex In 2020-21, 74% of victims/survivors residing in safe accommodation identified as heterosexual. 1% identified as gay/lesbian and 3% identified as bisexual. Data was unknown for 22%.</p>	<p>Through a variety of engagement events with specialist providers supporting people who identify as lesbian, gay or bisexual, as well as victims/survivors of domestic abuse who identify as lesbian, gay and bisexual, it was suggested that awareness of domestic abuse support, including safe accommodation was increased within such organisations, as some victims/survivors feel more comfortable approaching identified organisations for support.</p> <p>The engagement also recommended that services supporting DA victims/survivors need to</p>	<p>A recent LGBTQ+ Public Health survey conducted in East Sussex found that 4% of respondents have experienced bi/homo/transphobia in the home in the past 12 months – while this figure is also low, it represents a higher number than was captured in the needs assessment and indicates that more must be done to reach these groups.</p>	<p>We will explore increasing specialist floating support and dispersed and self-contained units of safe accommodation that can accommodate lesbian gay and bisexual victims/survivors and invest in awareness training for frontline practitioners.</p> <p>Refuge and safe accommodation providers link with specialist organisations to promote inclusivity of service offer and support and to provide training to staff in supporting victims to understand the needs of the lesbian, gay and bisexual people.</p> <p>Funding has been secured to recruit additional LGBTQ+ IDVAs (Independent Domestic Violence Advisors) in East Sussex.</p>



Protected characteristics groups under the Equality Act 2010	What do you know⁸? Summary of data about your service-users and/or staff	What do people tell you⁹? Summary of service-user and/or staff feedback	What does this mean¹⁰? Impacts identified from data and feedback (actual and potential)	What can you do¹¹? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
		be upskilled to better understand the needs of people with all sexual orientations.		
Marriage and civil partnership²⁰	This dataset shows the number of people aged 16 and over by their marital status, age and gender for the 2011 Census for East Sussex. Single 29% Married 48% Same Sex Civil Partnership 0.5% Divorced 11% Separated 3% Widowed 8.5%	No feedback given and a disproportionate impact is not anticipated as safe accommodation is open to all regardless of their marital status.		Support will be provided to victims and survivors in safe accommodation going through a divorce process with any practical and additional emotional support needed for their wellbeing during the process.
Impacts on community cohesion²¹	Via contract monitoring and reporting, there are known issues of bullying within refuges amongst service users.	Feedback via the public consultation on the strategy has highlighted conflicting views in relation to trans women accessing safe accommodation.	The differing views on single sex safe accommodation and trans inclusivity has an impact on community cohesion,	Staff training on diversity and inclusion within safe accommodation settings. Within contract monitoring of safe accommodation services, commissioners ensure that



Protected characteristics groups under the Equality Act 2010	What do you know⁸? Summary of data about your service-users and/or staff	What do people tell you⁹? Summary of service-user and/or staff feedback	What does this mean¹⁰? Impacts identified from data and feedback (actual and potential)	What can you do¹¹? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
		Some feedback received suggests that women need single-sex provision in order to feel safe and that this is possible under the single-sex exemption of the Equality Act. This is balanced by other feedback about the need to offer trans inclusive services.	both within the wider community, the LGBTQ+ community and within the refuge itself.	incidents of bullying are responded to in a timely, efficient and trauma informed way. Safe accommodation providers will have clear and transparent policies on their position with regards to trans inclusivity. The local authority will carry out further engagement work with the trans community, services and organisations that support and advocate for the trans community and engagement with those with lived experience of domestic abuse to explore preferred options for trans women and men who are victims/survivors and who need safe accommodation.



Additional categories

(identified locally as potentially causing / worsening inequality)

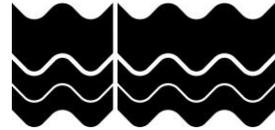
Characteristic	What do you know ²² ?	What do people tell you ²³ ?	What does this mean ²⁴ ?	What can you do ²⁵ ?																					
Rurality²⁶	<p>East Sussex</p> <p>This dataset shows the resident population by urban and rural areas in East Sussex in 2011 and its districts (source: ONS Census 2011)</p> <table border="1"> <thead> <tr> <th>Urban-Rural</th> <th>Urban</th> <th>Rural</th> </tr> </thead> <tbody> <tr> <td>East Sussex</td> <td>389946</td> <td>136725</td> </tr> <tr> <td>Eastbourne</td> <td>99412</td> <td>0</td> </tr> <tr> <td>Hastings</td> <td>90254</td> <td>0</td> </tr> <tr> <td>Lewes</td> <td>75173</td> <td>22329</td> </tr> <tr> <td>Rother</td> <td>43168</td> <td>47420</td> </tr> <tr> <td>Wealden</td> <td>81939</td> <td>66976</td> </tr> </tbody> </table> <p>Over a 12-month period, 72% of refuge referrals where a postcode was provided were from out of area in East Sussex.</p>	Urban-Rural	Urban	Rural	East Sussex	389946	136725	Eastbourne	99412	0	Hastings	90254	0	Lewes	75173	22329	Rother	43168	47420	Wealden	81939	66976	<p>Feedback from engagement work as part of the recommission of DVA services in 2018 involving specialist services working with older people and in rural areas, given the older people are disproportionately represented in rural areas of East Sussex highlighted that the majority of specialist services operate in coastal areas or in the towns within East Sussex. There was consensus that specialist services need for multi-agency working to ensure that victims have access to the support needed, including the need to</p>	<p>Safe accommodation provided in rural areas needs to ensure links to support, including access to transport.</p> <p>Support for move on needs to be person centred and ensure issues of isolation and access to support are considered for move on into rural areas.</p>	<p>Safe accommodation providers to consider the impact of rurality, particularly in terms of move on to ensure that adequate support is provided to reduce isolation and in meeting the needs of the person.</p>
Urban-Rural	Urban	Rural																							
East Sussex	389946	136725																							
Eastbourne	99412	0																							
Hastings	90254	0																							
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Wealden	81939	66976																							



Characteristic	What do you know ²² ?	What do people tell you ²³ ?	What does this mean ²⁴ ?	What can you do ²⁵ ?
		reduce isolation and ensure support with travel from rural to urban areas.		
Carers	No available data on carers accessing domestic abuse services though there's anecdotal evidence that those in caring roles and care for can both be at an enhanced risk of domestic abuse.	Victims who have caring responsibilities face particular challenges in managing these and will face additional stress and barriers to seeking safety.	Commissioned services to explore impact on carers coming in the refuge or safe accommodation provided by East Sussex.	Partnership working between refuge and safe accommodation within ASCH to access carers assessment and links with Care for the Carers, the East Sussex commissioned service to ensure that carers receive support.
Other groups that may be differently affected (including but not only: homeless people, substance users, care leavers – see end note) ²⁷	Pan Sussex The needs assessment showed that in 2020-21, of those denied access to or deemed ineligible for accommodation services across Sussex, an estimated 52% had mental health issues, 40% had alcohol misuse problems and 27% had drug misuse problems.	Multiple Complex Needs (MCN) Stakeholders reinforced how individuals with MCN present the highest vulnerability and risk, but also have the lowest possibility of gaining access to safe	An eviction or early departure from one refuge can mean that victim/survivor is then barred from other local refuges, reducing victims/survivors' choices even more. However, such a departure is often due	Consistent trauma-informed practice training should be developed for district and borough housing teams, housing associations and registered social landlords, expanding

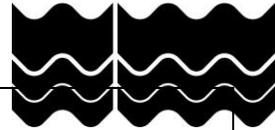


Characteristic	What do you know ²² ?	What do people tell you ²³ ?	What does this mean ²⁴ ?	What can you do ²⁵ ?
	<p>East Sussex East Sussex has 19 lower super output areas among the top 10% of the most deprived in England; 16 are in Hastings, two are in Eastbourne, and one in Rother. (LSCB Annual Report)</p>	<p>spaces and are often marginalised by services.</p> <p>Poverty Refuge is often unaffordable for working victims/survivors, who do not have access to Housing Benefit to contribute to the costs of supported living.</p>	<p>to a lack of specialist support within the refuge, such as substance misuse or culturally specific support, rather than that individual being a risk to other residents</p>	<p>on existing training packages.</p>
<p>Assessment of overall impacts and any further recommendations²⁸ - include assessment of cumulative impacts (where a change in one service/policy/project may have an impact on another)</p>				
<p>The overall impacts on various equality strands are heavily impacted by intersectionality. People with the protected characteristic of gender reassignment are protected from discrimination by The Equality Act 2010. This act also allows service providers to restrict access to single sex spaces on the basis of biological sex if there is a clear justification. The Gender Recognition Act does not currently allow a legal change in gender on the basis of self-identification alone. ESCC are committed to supporting victims/survivors in the trans community and will risk assess on a case-by-case basis which setting is most suitable to support trans victims/survivors.</p>				

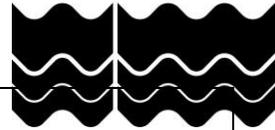


3. List detailed data and/or community feedback that informed your EqlA

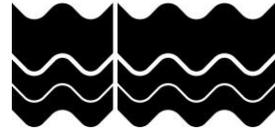
Source and type of data (e.g. research, or direct engagement (interviews), responses to questionnaires, etc.)	Date	Gaps in data	Actions to fill these gaps: who else do you need to engage with? (add these to the Action Plan below, with a timeframe)
East Sussex Seniors Association	12.11.21	We were asked access to services for older people.	The service changes for older people have been included in the EqlA and included in the action plan.
Inclusion Advisory Group	13.12.21	Issues of intersectionality and services for lesbian, gay and bisexual people as well as for those from ethnic minority backgrounds were raised.	The Action plan for this EqlA has been amended to include the mitigations and ensure service provision will be enhanced as a result of this intervention.
Partners operating in East Sussex Age UK East Sussex Brighton Housing trust CAPA First response Change, Grow, Live East Sussex Domestic Abuse Service Domestic Abuse Housing Alliance East Sussex Adult Social Care Mental Health Team East Sussex County Council Children's Social Care East Sussex County Council SWIFT East Sussex Housing Officers Group Clarion Housing (East Sussex refuges)	2021		



<p>Eastbourne Borough Council Empowering Communities with Integrated Network Systems (ECINS) Friends, Families and Travellers Fulfilling Lives Hastings Borough Council Housing Hastings Borough Council, Supported Accommodation and Refuges Virtual Team Hersana CIC Home Start East Sussex Home Works Hourglass Imkaan Lewes District Council Mankind Initiative Oasis Optivo Consultancy company West SussexRother District Council Housing Sign Health, Domestic Abuse Service Southdown Housing Southdown Housing, Homelessness Prevention and Mental Health Support Survivor's Network Sussex Clinical Commissioning Group Sussex Partnership NHS Foundation Trust Sussex Police The Links Project The Probation Service The Rita Project</p>			
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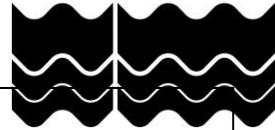
University Hospitals Sussex NHS Foundation Trust Veritas Justice Victim Support Yada Paws Protect Opoka			
LSCB-Annual-Report-2019-20-Safeguarding-Context-FINAL.pdf (esscp.org.uk)	23.11.21		
ONS census	2011		
Domestic abuse victim characteristics, England and Wales - Office for National Statistics (ons.gov.uk)	25.11.21		
		Gaps in data on carers using safe accommodation in East Sussex	To be included in data reporting going forward to understand how this group can be better supported.



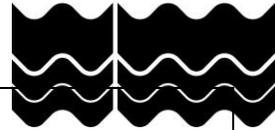
4. Prioritised Action Plan²⁹

NB: These actions must now be transferred to service or business plans and monitored to ensure they achieve the outcomes identified.

Impact identified and group(s) affected	Action planned	Expected outcome	Measure of success	Timeframe
Age- older people	CGL, including Housing Options IDVAs and refuge service to work collaboratively with Hourglass.	Development a specific policy of support for older people.	Increased older people accessing advice and support for domestic abuse.	December 2022
	Proactive promotion of service to older people.	De-stigmatise DA services and increase awareness for older people.	Increased older people accessing advice and support for domestic abuse.	December 2022
Age- children	Dedicated CYP workers in safe accommodation.	Children to access appropriate holistic support at an early stage.	Reduced child in need/ child protection plans.	March 2023
Disability	Develop new facilities or adapt existing facilities and install visual fire alarms to assist deaf people.	Disabled victims/survivors to have better access to safe accommodation.	Safe accommodation in East Sussex to be fitted with visual fire alarms. Increased accessible safe accommodation options in East Sussex.	December 2022
	Housing applications to be accessible and completed in person if required.	Disabled victims/survivors to be supported to achieve suitable housing.	Increase in disabled victims/survivors applying for housing following use of safe accommodation.	March 2023
Gender Reassignment	Media and comms to publicise the universality of access for a range of safe accommodation options for	Trans people to feel more able to approach services	Increase in trans people supported my safe	June 2023



	trans people accessing domestic abuse services in East Sussex.	for assistance in fleeing domestic abuse.	accommodation in East Sussex.	
	Dispersed accommodation to be explored as safe accommodation for trans women and men. Clarion Housing, as the refuge provider for East Sussex, to introduce self-contained refuge provision in Q2 of 2022.	Trans people to access support without possible barrier of being in a group setting.		March 2023
Pregnancy and Maternity	Safe accommodation providers to capture and report on clients that are pregnant within contract monitoring.	Increased data and knowledge about this protected group.	Pregnant women feeling better supported before and after giving birth in refuges and while accessing domestic abuse services.	September 2022
Race/ ethnicity	Explore options with Hersana for providing specialist in-reach and/or specialist IDVA consultation to staff and professionals from referring agencies.	Better understanding and support for people from minoritised ethnic groups.	More ethnic minority women feel able to use domestic abuse services and staff feel better informed about service provision to minoritised groups.	December 2022
Sex/ Gender	Explore options for provision of specialist, dispersed and self-contained units of safe accommodation that can accommodate male victims/survivors of domestic abuse.	Enhanced understanding of needs of men and non-binary people for the domestic abuse services.	Service provision will be inclusive for people of all genders.	December 2022
Sexual Orientation	Explore increasing specialist floating support and dispersed and self-contained units of safe accommodation that can	Enhanced service provision for lesbian, gay and bisexual people.	People from all sexual orientations feel safe and able to access domestic abuse services.	December 2022



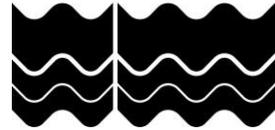
	accommodate lesbian gay and bisexual victims/survivors.			
	Link with specialist organisations to promote inclusivity of service offer and support and to provide training to staff in supporting victims to understand the needs of the lesbian, gay and bisexual community.		Staff better informed.	March 2022
	Recruit additional LGBTQ+ IDVAs (Independent Domestic Violence Advisors) in East Sussex.		Enhanced support for LGBTQ+ people on domestic abuse.	December 2022
Impacts on Community Cohesion	Staff training on diversity and inclusion within safe accommodation settings to be intersectional in approach.	Increased awareness and support around all protected characteristics.	Staff better informed about equality, diversity and inclusion issues related to domestic abuse.	March 2022
	Within contract monitoring of safe accommodation services, commissioners ensure that incidents of bullying are responded to in a timely, efficient and trauma informed way.	Everyone using domestic abuse services feels safe, included and supported.	Incidents of bullying will be dealt with promptly and there will be a reduction in number of such incidents.	March 2022
	Safe accommodation providers should have clear and transparent policies on their position with regards to trans inclusivity.	Staff to be confident on provider policy and support for trans people.	Better informed and inclusive services for trans people.	June 2022
Carers	Explore collecting data in safe accommodation providers on residents with caring responsibility.	Better understanding of carers needs for domestic abuse services.	Increased data and knowledge about this protected group.	December 2022

EqIA sign-off: (for the EqIA to be final an email must be sent from the relevant people agreeing it, or this section must be signed)

Staff member competing Equality Impact Analysis: **Sarah Murray** **Date: 14 December 2021**

Directorate Management Team rep or Head of Service:  **Tom Hook** **Date: 23rd December 2021**

Equality lead: **Kaveri Sharma** **Date: 23 December 2021**



Guidance end-notes

¹ The following principles, drawn from case law, explain what we must do to fulfil our duties under the Equality Act:

- **Knowledge:** everyone working for the Council must be aware of the Council's duties under the Equality Act 2010 and ensure they comply with them appropriately in their daily work.
- **Timeliness:** the duty applies at the time of considering policy options and/or before a final decision is taken – not afterwards.
- **Real Consideration:** the duty must be an integral, rigorous part of your decision-making process and influence the process.
- **Sufficient Information:** you must assess what information you have and what is further needed to give proper consideration.
- **No delegation:** the Council is responsible for ensuring that any contracted services, which are provided on its behalf need also to comply with the same legal obligations under the Equality Act of 2010. You need, therefore, to ensure that the relevant contracts make these obligations clear to the supplier. It is a duty that cannot be delegated.
- **Review:** the equality duty is a continuing duty. It applies when a policy or service is developed/agreed, and when it is implemented and reviewed.
- **Proper Record Keeping:** to prove that the Council has fulfilled its legal obligations under the Equality Act you must keep records of the process you follow and the impacts identified.

NB: Filling out this EqIA in itself does not meet the requirements of the Council's equality duty. All the requirements above must be fulfilled, or the EqIA (and any decision based on it) may be open to challenge. An EqIA therefore can provide evidence that the Council has taken practical steps comply with its equality duty and provide a record that to demonstrate that it has done so.

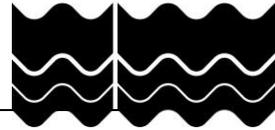
² Our duties in the Equality Act 2010

As a public sector organisation, we have a legal duty (under the Equality Act 2010) to show that we have identified and considered the actual and potential impact of our activities on people who share any of the legally 'protected characteristics' (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage and civil partnership).

This applies to policies, services (including commissioned services), and our employees. The level of detail of this consideration will depend on the nature of your project, who it might affect, those groups' vulnerability, and the seriousness of any potential impacts it might have. We use this EqIA template to gather information and assess the impact of our project in these areas.

The following are the duties in the Act. You must give 'due regard' (pay conscious attention) to the need to:

- **avoid, reduce, minimise or eliminate any negative impact** (if you identify unlawful discrimination, including victimisation and harassment, you must stop the action and take advice immediately).



- **promote equality of opportunity.** This means the need to:
 - Remove or minimise disadvantages suffered by equality groups
 - Take steps to meet the needs of equality groups
 - Encourage equality groups to participate in public life or any other activity where participation is disproportionately low
 - Consider if there is a need to treat disabled people differently, including more favourable treatment where necessary
- **foster good relations between people who share a protected characteristic and those who do not.** This means:
 - Tackle prejudice
 - Promote understanding

³ **EqlAs are always proportionate** to:

- The nature of the service, or scope of the policy/strategy
- The resources involved
- The number of people affected
- The size of the likely impact
- The vulnerability of the people affected

The greater the potential adverse impact of the proposed service or policy on a protected group (e.g. disabled people), the more thorough and demanding our process must be so that we comply with the Equality Act of 2010.

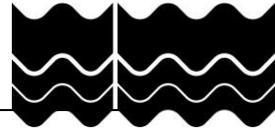
⁴ **Title of EqlA:** This should clearly explain what service / policy / strategy / change you are assessing

⁵ **Team/Department:** Main team responsible for the policy, practice, service or function being assessed

⁶ **Focus of EqlA:** A member of the public should have a good understanding of the policy or service and any proposals after reading this section. Please use plain English and write any acronyms in full first time - eg: 'Equality Impact Analysis (EqlA)'

This section should explain what you are assessing:

- What are the main aims or purpose of the service, policy, strategy, practice, or function?
- Who implements, carries out or delivers the service, policy, strategy, practice, or function? Please state where this is more than one person/team/body and where other organisations deliver under procurement or partnership arrangements.
- How does it fit with other services?



- Who is affected by the service, policy, strategy, practice, or function, or by how it is delivered? Who are the external and internal service-users, groups, or communities?
- What outcomes do you want to achieve, why and for whom? Eg: what do you want to provide, what changes, or improvements, are required and what should the benefits be?
- What do existing or previous reviews of the service, policy, strategy, practice, or function indicate to you?
- What is the reason for the proposal, or change (financial, service scope, legal requirements, etc)? The Equality Act requires us to make these clear.

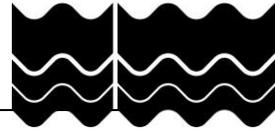
⁷ **Previous actions:** If there is no previous EqIA, or this assessment is for a new service, then simply write ‘not applicable’.

⁸ **Data:** Make sure you have enough information to inform your EqIA.

- What data relevant to the impact on protected groups of the policy/decision/service is available?⁸
- What further evidence is needed and how can you get it? (Eg: further research or engagement with the affected groups).
- What do you already know about needs, access and outcomes? Focus on each of the protected characteristics in turn. Eg: who uses the service? Who doesn't and why? Are there differences in outcomes? Why?
- Have there been any important demographic changes or trends locally? What might they mean for the service or function?
- Does data/monitoring show that any policies or practices create particular problems or difficulties for any groups?
- Do any equality objectives already exist? What is current performance like against them?
- Is the service having a positive or negative effect on particular people in the community, or particular groups / communities?

⁹ **Engagement:** You must engage appropriately with those likely to be affected to fulfil the Council's duties under the Equality Act.

- What do people tell you about the services, the policy or the strategy?
- Are there patterns or differences in what people from different groups tell you?
- What information or data will you need from communities?
- How should people be consulted? Consider:
 - (a) consult when proposals are still at a formative stage;
 - (b) explain what is proposed and why, to allow intelligent consideration and response;
 - (c) allow enough time for consultation;
 - (d) make sure what people tell you is properly considered in the final decision.
- Try to consult in ways that ensure all different perspectives can be captured and considered.
- Identify any gaps in who has been consulted and identify ways to address this.



¹⁰ Your EqIA must get to grips fully and properly with actual and potential impacts.

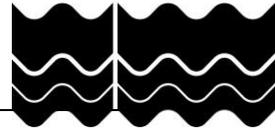
- The Council’s obligations under the Equality Act of 2010 do not stop you taking decisions, or introducing well needed changes; however, they require that you take decisions and make changes conscientiously and deliberately confront the anticipated impacts on people.
- Be realistic: don’t exaggerate speculative risks and negative impacts.
- Be detailed and specific so decision-makers have a concrete sense of potential effects. Instead of “the policy is likely to disadvantage older women”, say how many or what percentage are likely to be affected, how, and to what extent.
- Questions to ask when assessing impacts depend on the context. Examples:
 - Are one or more protected groups affected differently and/or disadvantaged? How, and to what extent?
 - Is there evidence of higher/lower uptake among different groups? Which, and to what extent?
 - If there are likely to be different impacts on different groups, is that consistent with the overall objective?
 - If there is negative differential impact, how can you minimise that while taking into account your overall aims
 - Do the effects amount to unlawful discrimination? If so, the plan must be modified.
 - Does the proposal advance equality of opportunity and/or foster good relations? If not, could it?

¹¹ Consider all three aims of the Act: removing barriers, and also identifying positive actions to be taken.

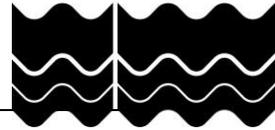
- Where you have identified impacts you must state what actions will be taken to remove, reduce or avoid any negative impacts and maximise any positive impacts or advance equality of opportunity.
- Be specific and detailed and explain how far these actions are expected to address the negative impacts.
- If mitigating measures are contemplated, explain clearly what the measures are, and the extent to which they can be expected to reduce / remove the adverse effects identified.
- An EqIA which has attempted to airbrush the facts is an EqIA that is vulnerable to challenge.

¹² **Age:** People of all ages

¹³ **Disability:** A person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. The definition includes: sensory impairments, impairments with fluctuating or recurring effects, progressive, organ specific, developmental, learning difficulties, mental health conditions and mental illnesses, produced by injury to the body or brain. Persons with cancer, multiple sclerosis or HIV infection are all now deemed to be disabled persons from the point of diagnosis. Carers of disabled people are protected within the Act by association.



- ¹⁴ **Gender Reassignment:** In the Act a transgender person is someone who proposes to, starts or has completed a process to change his or her gender. A person does not need to be under medical supervision to be protected
- ¹⁵ **Pregnancy and Maternity:** Protection is during pregnancy and any statutory maternity leave to which the woman is entitled.
- ¹⁶ **Race/Ethnicity:** This includes ethnic or national origins, colour or nationality, and includes refugees and migrants, and Gypsies and Travellers. Refugees and migrants means people whose intention is to stay in the UK for at least twelve months (excluding visitors, short term students or tourists). This definition includes asylum seekers; voluntary and involuntary migrants; people who are undocumented; and the children of migrants, even if they were born in the UK.
- ¹⁷ **Religion and Belief:** Religion includes any religion with a clear structure and belief system. Belief means any religious or philosophical belief. The Act also covers lack of religion or belief.
- ¹⁸ **Sex/Gender:** Both men and women are covered under the Act.
- ¹⁹ **Sexual Orientation:** The Act protects bisexual, gay, heterosexual and lesbian people
- ²⁰ **Marriage and Civil Partnership:** Only in relation to due regard to the need to eliminate discrimination.
- ²¹ **Community Cohesion:** potential impacts on how well people from different communities get on together. The council has a legal duty to foster good relations between groups of people who share different protected characteristics. Some actions or policies may have impacts – or perceived impacts – on how groups see one another or in terms of how the council’s resources are seen to be allocated. There may also be opportunities to positively impact on good relations between groups.
- ²² **Data:** Make sure you have enough information to inform your EqIA.
- What data relevant to the impact on protected groups of the policy/decision/service is available?²²
 - What further evidence is needed and how can you get it? (Eg: further research or engagement with the affected groups).
 - What do you already know about needs, access and outcomes? Focus on each of the protected characteristics in turn. Eg: who uses the service? Who doesn’t and why? Are there differences in outcomes? Why?
 - Have there been any important demographic changes or trends locally? What might they mean for the service or function?
 - Does data/monitoring show that any policies or practices create particular problems or difficulties for any groups?
 - Do any equality objectives already exist? What is current performance like against them?



- Is the service having a positive or negative effect on particular people in the community, or particular groups or communities?

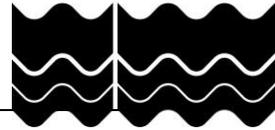
²³ **Engagement:** You must engage appropriately with those likely to be affected to fulfil the Council's duties under the Equality Act .

- What do people tell you about the services, the policy or the strategy?
- Are there patterns or differences in what people from different groups tell you?
- What information or data will you need from communities?
- How should people be consulted? Consider:
 - (a) consult when proposals are still at a formative stage;
 - (b) explain what is proposed and why, to allow intelligent consideration and response;
 - (c) allow enough time for consultation;
 - (d) make sure what people tell you is properly considered in the final decision.
- Try to consult in ways that ensure all different perspectives can be captured and considered.
- Identify any gaps in who has been consulted and identify ways to address this.

²⁴ Your EqIA must get to grips fully and properly with actual and potential impacts.

- The Council's obligations under the Equality Act of 2010 do not stop you taking decisions, or introducing well needed changes; however, they require that take decisions and make changes conscientiously and deliberately confront the anticipated impacts on people.
- Be realistic: don't exaggerate speculative risks and negative impacts.
- Be detailed and specific so decision-makers have a concrete sense of potential effects. Instead of "the policy is likely to disadvantage older women", say how many or what percentage are likely to be affected, how, and to what extent.
- Questions to ask when assessing impacts depend on the context. Examples:
 - Are one or more protected groups affected differently and/or disadvantaged? How, and to what extent?
 - Is there evidence of higher/lower uptake among different groups? Which, and to what extent?
 - If there are likely to be different impacts on different groups, is that consistent with the overall objective?
 - If there is negative differential impact, how can you minimise that while taking into account your overall aims
 - Do the effects amount to unlawful discrimination? If so the plan must be modified.
 - Does the proposal advance equality of opportunity and/or foster good relations? If not, could it?

²⁵ Consider all three aims of the Act: removing barriers, and also identifying positive actions to be taken.



- Where you have identified impacts you must state what actions will be taken to remove, reduce or avoid any negative impacts and maximise any positive impacts or advance equality of opportunity.
- Be specific and detailed and explain how far these actions are expected to address the negative impacts.
- If mitigating measures are contemplated, explain clearly what the measures are, and the extent to which they can be expected to reduce / remove the adverse effects identified.
- An EqIA which has attempted to airbrush the facts is an EqIA that is vulnerable to challenge.

²⁶ **Rurality:** deprivation is experienced differently between people living in rural and urban areas. In rural areas issues can include isolation, access to services (eg: GPs, pharmacies, libraries, schools), low income / part-time work, infrequent public transport, high transport costs, lack of affordable housing and higher fuel costs. Deprivation can also be more dispersed and less visible.

²⁷ **Other groups that may be differently affected:** this may vary by services, but examples include: homeless people, substance misusers, people experiencing domestic/sexual violence, looked after children or care leavers, current or former armed forces personnel (or their families), people on the Autistic spectrum etc.

²⁸ **Assessment of overall impacts and any further recommendations**

- Make a frank and realistic assessment of the overall extent to which the negative impacts can be reduced or avoided by the mitigating measures. Explain what positive impacts will result from the actions and how you can make the most of these.
- Countervailing considerations: These may include the reasons behind the formulation of the policy, the benefits it is expected to deliver, budget reductions, the need to avert a graver crisis by introducing a policy now and not later, and so on. The weight of these factors in favour of implementing the policy must then be measured against the weight of any evidence as to the potential negative equality impacts of the policy.
- Are there any further recommendations? Is further engagement needed? Is more research or monitoring needed? Does there need to be a change in the proposal itself?

²⁹ **Action Planning:** The Council's obligation under the Equality Act of 2010 is an ongoing duty: policies must be kept under review, continuing to give 'due regard' to the duty. If an assessment of a broad proposal leads to more specific proposals, then further equality assessment and consultation are needed.