

## Equality Impact Assessment (EQIA)



### You will need to produce an Equality Impact Assessment (EQIA) if:

- You are developing a new policy, strategy, or service
- You are making changes that will affect front-line services
- You are reducing budgets, which may affect front-line services
- You are changing the way services are funded and this may impact the quality of the service and who can access it
- You are making a decision that could have a different impact on different groups of people
- You are making staff redundant or changing their roles

Guidance notes on how to complete an EQIA and sign off process are available on the Hub under Equality and Diversity. You must read the [guidance notes](#) and ensure you have followed all stages of the EQIA approval process (outlined in appendix 1). Section 2 of the template requires you to undertake an assessment of the impact of your proposals on groups with protected characteristics. Equalities and borough profile data, as well as other sources of statistical information can be found on the Harrow hub, within the section entitled: [Equality Impact Assessment](#) - sources of statistical information.

## Equality Impact Assessment (EIA)

<b>Type of Decision:</b>	<input checked="" type="radio"/> Cabinet <input type="radio"/> Portfolio holder <input type="radio"/> Other (state)	
<b>Title of Proposal</b>	Procurement of Harrow Council's Domestic Abuse Service 2023	<b>Date EQIA created: June 2022</b>
<b>Name and job title of completing/lead Officer</b>	Kate Curley: Assistant Policy Officer / Hodan Elmi: Policy Officer	
<b>Directorate/Service responsible</b>		
<b>Organisational approval</b>		
<b>EQIA approved by Directorate Equalities Lead</b>	<b>Name: Jennifer Rock</b> <b>Assistant Policy Officer</b>	<b>Signature:</b> <input checked="" type="checkbox"/> <b>Tick this box to indicate that you have approved this EQIA</b>  <b>Date of approval: 7.8.22</b>

## 1. Summary of proposal, impact on groups with protected characteristics and mitigating actions (to be completed after you have completed sections 2 - 5)

### a) What is your proposal?

Harrow Council commissions a range of support services for survivors of domestic and sexual abuse. The contract for the existing service expires on 31<sup>st</sup> March 2023. The proposal is to re-procure these services and for a new contract to commence on the 1<sup>st</sup> of April 2023.

The new service will comprise:

An outreach service accessible to all victims covered under the 9 protected characteristics. The IDVA service will be expanded to accommodate the increase in high-risk referrals from Children's and Adult services; provide support and longer-term casework to all victims assessed as medium to standard risk; safety planning for standard risk victims within the MASH and support for victims with complex needs at risk of homelessness.

A 6-bed refuge for victims of abuse and children aged 16 and under (boys and girls) for female victims.

A clinical assessment service to safeguard victims and their families from further abuse.

The contract term will be for three years with the option to extend for a further two years until 31<sup>st</sup> March 2028 within a maximum annual cost of £291, 847 per annum.

The procurement of a domestic abuse service for Harrow's residents supports the delivery of the Council's domestic abuse priorities, which form part of the Community Safety, Violence, Vulnerability and Exploitation strategy. It also enables the Council to discharge its duties in relation to:

**The Care Act 2014** sets out a clear legal framework for how local authorities and other parts of the system should protect adults at risk of abuse or neglect, including domestic abuse.

**The Children Act 1989** introduced Significant Harm as the threshold that justifies compulsory intervention in family life in the best interests of children. Physical Abuse, Sexual Abuse, Emotional Abuse and Neglect are all categories of Significant Harm.

**Housing (1996) and Homelessness (2002) Acts** specify that local authorities have a duty to provide housing advice to anyone who is homeless or threatened with homelessness – including those who are living in a refuge.

**The Homelessness Reduction Act 2017** places new legal duties on English local authorities, to provide advice and assistance to anyone eligible person who is homeless or at risk of homelessness, irrespective of their priority need status. The legislation imposes greater responsibilities on Councils to prevent homelessness and provide advice and assistance to through a tailored plan to assist an applicant to retain or secure accommodation. The legislation imposes greater responsibilities on Councils to prevent homelessness and provide advice and assistance to through a tailored plan to assist an applicant to retain or secure accommodation.

**The Domestic Abuse Act 2021** will also place a statutory duty on Tier 1<sup>1</sup> local authorities to provide domestic abuse support within safe accommodation. The Act also recognises children aged 16 and under as victims of domestic abuse. Local authorities in London, which are classed as Tier 2 will be required to work in partnership with the Greater London Authority (Tier1) to help inform the commissioning and delivery of support in their borough.

**b) Summarise the impact of your proposal on groups with protected characteristics**

The service specification for the new domestic abuse service aims to support groups from all protected characteristics and ensure a positive impact where possible.

**c) Summarise any potential negative impact(s) identified and mitigating actions**

The new domestic abuse service aims to support victims from all protected groups. This assessment highlights issues faced by male survivors fleeing domestic abuse, those with physical disabilities/mobility, mental health and children aged 16 and under, with the aim of helping to improve access to domestic abuse services in the borough. These issues are not confined to Harrow but impacts victims regionally and nationally. In the Domestic Abuse Act 2021, the government is committed to ensuring that all victims/survivors of these crimes, of all protected characteristics, receive the support they deserve, and recognises its responsibilities under the Public Sector Equality Duty provided for in the Equality Act 2010. The Council will continue to improve services where it has the authority and ability to do so, highlight and advocate for change, facilitate partnership working and seek long-term sustainable funding to deliver domestic abuse services to Harrow residents.

In addition to this, one negative impact identified could be that due to the increase of domestic abuse referrals, this could far out-weigh the borough's capacity to support.

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<sup>1</sup> The GLA is categorised as a Tier one local authority and London boroughs are classed as Tier 2.

2. Assessing impact					
<p>You are required to undertake a detailed analysis of the impact of your proposals on groups with protected characteristics. You should refer to <a href="#">borough profile data</a>, <a href="#">equalities data</a>, service user information, consultation responses and any other relevant data/evidence to help you assess and explain what impact (if any) your proposal(s) will have on <b>each</b> group. Where there are gaps in data, you should state this in the boxes below and what action (if any), you will take to address this in the future.</p>		<p>What does the evidence tell you about the impact your proposal may have on groups with protected characteristics? Click the relevant box to indicate whether your proposal will have a positive impact, negative (minor, major), or no impact</p>			
Protected characteristic	For <b>each</b> protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Click the appropriate box on the right to indicate the outcome of your analysis.	Positive impact	Negative impact		No impact
			Minor	Major	
Age	<p>The Government's population estimates as of mid-2020 show that the total population of Harrow is now 252,338.</p> <p>As with other parts of the country, Harrow has an ageing population with 62.6% (157,892) aged 16-64. The number and proportion of older people in Harrow continue to increase with 16.1 percent (40,634) are now aged 65.</p> <ul style="list-style-type: none"> <li>- The current service sees peak referrals from the 26–49-year-old age range followed by the 18-25 age range. Service user data for 2021-22 shows that 2% of service users aged 55 plus experienced domestic abuse from and adult family member, or from a current partner. Anecdotal evidence from local service have also reported an increase in abuse experienced by older people. The new service will aim to support victims aged 16 upwards and ensure older vulnerable people are supported, in line with the duties under the Domestic Abuse Act 2021.</li> <li>- The new service supports victims aged 16 years. In 2021-22, there were 227 of cases referred to MARAC. In 2021-22, there were 214 children in the household impacted by domestic abuse.</li> <li>- The new service will be expanded to include a full-time Children's IDVA, and Safety Planner co-located in Children's Services and the MASH to support victims</li> </ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	<p>assessed as standard to high risk and work collaboratively with social workers that are supporting families.</p> <ul style="list-style-type: none"> <li>- The new service will also include the provision of independent clinical assessments, to help safeguard children at risk from further abuse.</li> <li>- Evidence gathering to support the procurement of a new service highlighted a gap in trauma therapy for children, as well as adults impacted by abuse. The Council will continue to engage in dialogue with the health sector colleagues to seek long-term solutions to support to victims aged 16 and under and adults that require clinical therapeutic support.</li> <li>- The draft domestic abuse Bill recognises children as victims of domestic abuse and when passed, London local authorities will be required to work closely with the GLA (Tier 1) to provide input to the provision of domestic abuse services in London.</li> </ul>				
<b>Disability</b>	<p>In the ONS Annual Population Survey (July 2019 to June 2020) 15% of Harrow's working age population classified themselves as disabled, a total of 23,500 people.</p> <ul style="list-style-type: none"> <li>- Service user data for 2021-2022 shows 8% of female and male victims with physical disabilities/mobility issues were supported through the IDVA service</li> <li>- Service data also highlighted that 20% of male and female victims were diagnosed with mental health issues: mainly anxiety, depression, and PTSD and likely to be at threat of homelessness. Lockdown resulted in an increase in domestic abuse referrals and those reporting increased levels of anxiety depression, PTSD, and insecure housing circumstances.</li> <li>- The new service will include a Complex Needs worker, which will provide long-term support to victims with diagnosed mental health and substance misuse issues and at risk of homelessness. The refuge is a housing association property and leased from Network Homes. The refuge is unable to cater for victims with mobility issues, as all six bedspaces are located on the first floor and there is no lift access. The Harrow refuge is unable to support victims with severe mental health issues, as the safety of other residents and children need to be considered. If a victim being referred to the refuge had specific needs that could not be met at the Harrow refuge, then the victim would be signposted to a specialist refuge in another area. However, there is a shortage of specialist refuges in London and across the country. This issue has been raised as part of the government's consultation with London</li> </ul>	☒	☐	☐	☐

	boroughs regarding domestic abuse legislation and the provision of support in safe accommodation.				
<b>Gender reassignment</b>	There is limited data held about this protected characteristic for the Harrow population. The England/Wales Census and Scottish Census have not asked if people identify as transgender. Service user data for the current domestic abuse service shows that no victims identified as transgender. Outreach services will offer support to victims regardless of their gender.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Marriage and Civil Partnership</b>	<ul style="list-style-type: none"> <li>- At the time of the 2011 Census 54% of Harrow's residents were married, which was the highest level in London. 21% of households were married, or in same-sex civil partnerships, with dependent children, the highest level in London.</li> <li>- In October 2020 there have been 144 Same Gender Civil Partnerships in Harrow, 25 of which has been converted to a Marriage. There have been 8 Opposite Gender Civil Partnerships. There have been 57 Same Sex marriages.</li> </ul> <p>Current service provision in Harrow remains the same regardless of marital status, it is known that individuals, particularly women, living in couples (married or cohabiting) or who have decided to separate from their partners are more likely to be a victim of domestic abuse. aims to support all residents regardless of their marriage status.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Pregnancy and Maternity</b>	<p>ONS births figures show Harrow had 3,506 births from mid-2019 to mid-2020.</p> <p>This is a high-risk group in relation to domestic abuse with pregnancy and maternity being a significant risk factor for victimisation.</p> <ul style="list-style-type: none"> <li>- Service user data shows that in 2021/22, 24 victims that were referred to the boroughs' Multi Agency Risk Conference (MARAC) were pregnant.</li> <li>- The new service will ensure that victims will continue to be supported and work in partnership with Children's Services and with the MOPAC funded IDVA service based in Northwick Park Hospital.</li> </ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<p><b>Race/ Ethnicity</b></p>	<p>Harrow has one of the most diverse populations in the country, of which 64% are from a Black, Asian, and Multi-ethnic background. 52% of the population identify as Asian, which ranks 2<sup>nd</sup> nationally and 16% are of Black heritage. The largest ethnic groups in the borough are Indian, followed by Kenyans and Sri Lankans. Harrow is home to the largest Sri Lankan born community in the country. The top three nationalities of the most recent arrivals to the borough are Romanian, Indian, and Polish.</p> <ul style="list-style-type: none"> <li>- Service user data for 2021-2022, shows that the ethnic make-up of service users was evenly spread across white and non-white backgrounds, with 29% of service users of Asian origin, 26% White and 18% Black and 10% from other ethnic backgrounds. A proportion of victim's ethnicity is unknown, or they've chosen not to disclose their ethnicity.</li> <li>- The new service will provide support to victims regardless of their ethnicity and will provide interpretation services where required. Work is being undertaken to ensure increase in awareness of domestic abuse and support services among Harrow's Romanian population.</li> <li>- MOPAC also funds specialist IDVA service for Black African and Caribbean victims and the Council has been proactive in promoting this and other specialist Black, Asian and Multi-ethnic services, offering expertise in supporting victims of honour-based violence, FGM, modern slavery and trafficking and those with No Recourse to Public Funds. The new service specification will require a future provider to understand the needs of Harrow's diverse communities and seek support, and/or refer victims to specialist service services to ensure no resident from Harrow is turned away.</li> </ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>Religion or belief</b></p>	<p>Religious diversity is strong in Harrow. At the 2011 Census Harrow was the most religiously diverse borough in the country. Harrow had the highest number (and proportion) of Hindu followers in the country (25.3%), the highest number of Jains (2.2%) and the second highest number of Zoroastrians. Harrow 's Jewish community was the sixth largest nationally. 37.3% of residents were Christians (the 5th lowest proportion in the country) and 12.5% were Muslims. Harrow had the 2nd lowest ranking for 'no religion'.</p> <ul style="list-style-type: none"> <li>- The service will require providers ensure frontline workers are trained to support victims, irrespective of their religion and to deliver support in a culturally sensitive</li> </ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	way, for example the understanding and sensitivity surrounding cultural norms such as arranged marriage.				
<b>Sex</b>	<p>The 2011 Census showed that in Harrow 49.4 per cent of residents were males and 50.6 per cent were females. The Government's population estimates as of mid-2019 show that the total population of Harrow is made up of 125,800 men and 125,400 women. Overall, the number of males and females living in Harrow is very similar.</p> <ul style="list-style-type: none"> <li>- The current service supports victims irrespective of their sex. Service user data shows that in 2021/2022, 98% of victims that accessed the service were female. However, Metropolitan Police data on recorded domestic abuse offences for the same period indicated that 25% (500) of domestic abuse victims were male<sup>2</sup>.</li> <li>- There is no, or very limited refuge and safe accommodation provision for male victims in Harrow</li> <li>- The intention going forward is to strengthen our response and ensure that male victims are supported. Further police data on the profile of male victims in the borough and referral pathways will be sought. The new service provider will also be expected to develop a delivery plan to raise awareness and increase the number of males accessing the IDVA service and referred to male specific support where required.</li> <li>- The Needs Analysis also highlighted the gap in perpetrator behaviour management, for both male and female. This was essential to preventing further escalation of abuse and repeat victimisation. Current interventions for high-risk cases are group based, with high drop-out rates.</li> <li>- Plans to identify appropriate and affordable solutions for addressing perpetrator behaviour are being researched. New Domestic Abuse legislation places statutory responsibility on Tier 1 authorities (GLA) to provide perpetrator programmes. This may provide the Council with opportunities to leverage support into the borough.</li> </ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Sexual Orientation</b>	ONS data shows that the proportion of the UK population aged 16 years and over identifying as heterosexual or straight decreased from 95.3% in 2014 to 94.6% in 2018 and the proportion identifying as lesbian, gay, or bisexual (LGB) increased from 1.6% in 2014 to 2.2% in 2018. There is limited information on the LGBT + population of Harrow.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<sup>2</sup> Source Mayor London VAWG Dashboard 2019/2020

	<ul style="list-style-type: none"> <li>- The current and new outreach service will continue to provide support to all victims, irrespective of their sexual orientation. The service provider will also ensure that LGBT victims are supported to access specialist services where required and if requested. Free specialist services will continue to be promoted on the Harrow website.</li> <li>- While the Harrow refuge is unable to accommodate male and transgender victims (female to male), the service provider will ensure that victims referred to its service are supported to find suitable/specialist accommodation or supported to remain safe in their own homes.</li> </ul>				
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**2.1 Cumulative impact – considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on groups with protected characteristics?**

Yes                      No   

If you clicked the Yes box, which groups with protected characteristics could be affected and what is the potential impact? Include details in the space below.

- The Council Proposes to amend the Borough Plan to add in a new overarching priority on tackling racial disproportionality, in support of Black Lives Matters.
- As part of the Council’s Equalities and Diversity Strategic Framework, proposals include conducting a thorough review of the way in which the Council provides services to its residents. This will require consulting service users and examining issues of cultural sensitivity, accessibility and any unconscious bias that may affect outcomes for different groups. Going forward, regular input and feedback from service users will continue to be a part of the performance monitoring process for the new service.

**2.2 Any other impact - considering what else is happening nationally/locally (national/local/regional policies, socio-economic factors etc.), could your proposals have an impact on individuals/service users, or other groups?**

Yes                      No   

If you clicked the Yes box, Include details in the space below.

The introduction of the new Domestic Abuse Act 2021. This legislation provides a new definition of domestic abuse, which has been expanded to include:

- coercive and controlling behaviour, economic and financial abuse, and stalking (including online abuse) and children aged 16 and under as victims of abuse. Going forward the services being procured is being designed to ensure that requirements are incorporated.

- All victims of domestic abuse will also be afforded priority need status which will require authorities to provide housing to those that meet the eligibility criteria. The MHCLG is currently consulting with Tier 1 local authorities (Greater London Authority) on the statutory duty to provide support within refuge and safe accommodation. The government has yet to clarify the position for London boroughs (which are classed as Tier 2) and the allocation of new burdens funding.
- Black, Asian, and Multi-Ethnic groups have been disproportionately impacted by Covid-19. The new service will ensure that Black, Asian, and Multiethnic victims with protected characteristics are able to access services. This will be monitored through performance monitoring and service reviews.

### 3. Actions to mitigate/remove negative impact

**Only complete this section if your assessment (in section 2) suggests that your proposals may have a negative impact on groups with protected characteristics. If you have not identified any negative impacts, please complete sections 4 and 5.**

In the table below, please state what these potential negative impact (s) are, mitigating actions and steps taken to ensure that these measures will address and remove any negative impacts identified and by when. Please also state how you will monitor the impact of your proposal once implemented.

State what the negative impact(s) are for <b>each</b> group, identified in section 2. In addition, you should also consider, and state potential risks associated with your proposal.	Measures to mitigate negative impact (provide details, including details of and additional consultation undertaken/to be carried out in the future). If you are unable to identify measures to mitigate impact, please state so and provide a brief explanation.	What action(s) will you take to assess whether these measures have addressed and removed any negative impacts identified in your analysis? Please provide details. If you have previously stated that you are unable to identify measures to mitigate impact, please state below.	Deadline date	Lead Officer

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#### 4. Public Sector Equality Duty

How does your proposal meet the Public Sector Equality Duty (PSED) to?

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
2. Advance equality of opportunity between people from different groups
3. Foster good relations between people from different groups

#### Include details in the space below

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010.  
The new domestic service will support domestic abuse victims from all protected groups where possible.
2. Advance equality of opportunity between people from different groups - Victims will be supported to lead healthy, safe, and independent lives. Performance indicators will include provisions to help victims into employment and volunteering, and help promote equal life chances for all - particularly those groups that are disproportionately impacted
3. Foster good relations between people from different groups- As above

#### 5. Outcome of the Equality Impact Assessment (EQIA) click the box that applies

Outcome 1

**No change required: the EQIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality of opportunity are being addressed**

**Outcome 2**

**Adjustments to remove/mitigate negative impacts identified by the assessment, or to better advance equality, as stated in section 3&4**

**Outcome 3**

**This EQIA has identified discrimination and/ or missed opportunities to advance equality and/or foster good relations. However, it is still reasonable to continue with the activity. Outline the reasons for this and the information used to reach this decision in the space below.**

Include details here