



EQIA Submission Draft Working Template

If required, this template is for use prior to completing your EQIA Submission in the EQIA App. You can use it to understand what information is needed beforehand to complete an EQIA submission online, and also as a way to collaborate with others who may be involved with the EQIA.

Note: You can upload this into the App when complete if it contains more detailed information than the App asks for and you wish to retain this detail.

Section A

1. Name of Activity (EQIA Title):	<i>Kent and Medway Domestic Abuse Strategy - update</i>
2. Directorate	<p>The strategy is owned by the Kent and Medway Domestic Abuse and Sexual Violence Executive.</p> <p>This partnership has representation from Kent Police, Medway Council, Kent County Council, the NHS, Probation, Kent Fire and Rescue, Public Health, Kent and Medway Clinical Commissioning Groups, the National Probation Service,) and District Councils</p> <p>Support for this partnership within KCC sits within Strategy, Policy. Relationships and Corporate Assurance, within Strategic and Corporate Services.</p>
3. Responsible Service/Division	As above

Accountability and Responsibility

4. Officer completing EQIA Note: This should be the name of the officer who will be submitting the EQIA onto the App.	Iona Hunter Whitehouse, Senior Project Development Officer
5. Head of Service Note: This should be the Head of Service who will be approving your submitted EQIA.	Akua Agepong – Assistant Director, Adults Services
6. Director of Service Note: This should be the name of your responsible director.	David Whittle, Director of Strategy Policy, Relationships & Corporate Assurance

The type of Activity you are undertaking

7. What type of activity are you undertaking?

Tick if Yes	Activity Type
	Service Change – <i>operational changes in the way we deliver the service to people.</i>
	Service Redesign – <i>restructure, new operating model or changes to ways of working</i>
	Project/Programme – <i>includes limited delivery of change activity, including partnership projects, external funding projects and capital projects.</i>
	Commissioning/Procurement – <i>means commissioning activity which requires commercial judgement.</i>
Yes	Strategy /Policy – <i>includes review, refresh or creating a new document</i>
	Other – Please add details of any other activity type here.

8. Aims and Objectives and Equality Recommendations – Note: You will be asked to give a brief description of the aims and objectives of your activity in this section of the App, along with the Equality recommendations. You may use this section to also add any context you feel may be required.

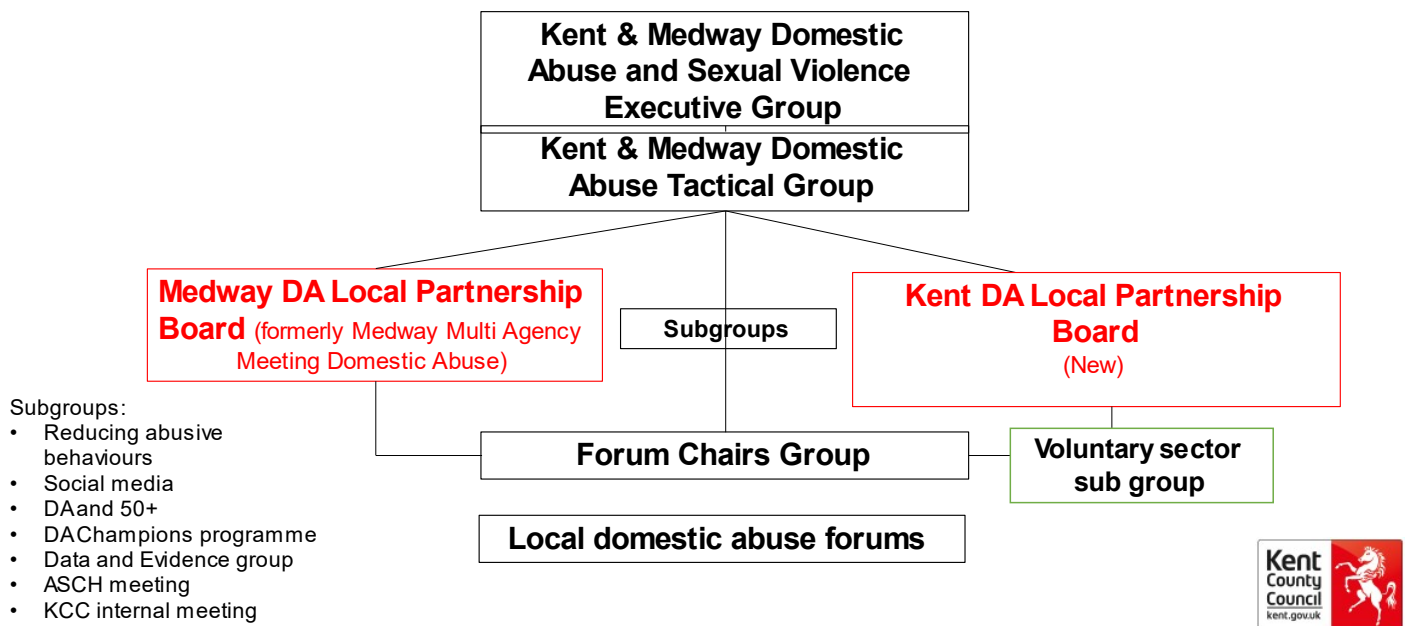
Summary and recommendations of equality analysis/impact assessment:

This equality impact analysis is for the amendment to priority three of the domestic abuse strategy following the implementation of the Domestic Abuse Act 2021. The strategy provides a joint statement across the Kent and Medway Domestic Abuse and Sexual Violence Executive. This is a partnership between the Kent Police and Crime Commissioners office, Kent Police, Medway Council, Kent County Council, the NHS, Kent Fire and Rescue, the National Probation Service,) and District Councils.

Domestic abuse works across a three tiered governance structure.

1. The Kent and Medway Domestic Abuse and Sexual Violence Executive Group. This group leads and sets the partnership's Domestic Abuse Strategy, its priorities and oversees action to ensure their delivery.
2. Two tactical groups for Domestic Abuse and Sexual Violence respectively, to deliver the joint action plans generated from the strategy and report back to the Executive Group.
3. The Local Partnership Board which is the only statutory body and works to ensure that Kent meets its requirements in relation to the Domestic Abuse Act.

Governance structures



This Kent and Medway Domestic Abuse strategy forms a joint narrative across the partnership, identifying shared priorities, outcomes and commitments around domestic abuse (DA). The strategy does not explicitly focus on sexual violence.

The strategy will be used with the strategic assessment and the updated 2021 Needs Assessment conducted by Public Health Intelligence to inform the joint action plan, agreed across the partnership.

An amendment to Priority Three of the strategy, 'Provision of Services' reflects updates made in 2021 in response to the Domestic Abuse Act and the new statutory duties and their impact on safe accommodation.

Aims and Objectives:

The Kent and Medway Domestic Abuse Strategy was consulted on for a 12-week period in 2019. A number of

changes were made in response to feedback and details of these updates can be found on the 2020 EqIA (inserted below). This assessment's objective is to focus solely on the amendment to priority three.



FINAL equality
impact assessment V3

The Amendment to Priority Three has also gone to 6-week formal consultation and has had extensive stakeholder consultation through each Kent & Medway Domestic Abuse Forum, Kent Housing Group & safeguarding boards. **Domestic Abuse Bill Update:** Following the introduction of the Domestic Abuse Act the Kent and Medway Domestic Abuse Strategy has been updated to reflect changes in legislation, duties and definitions. This has had particular impact on safe accommodation services. The Equality Impact Assessment below has been updated to reflect this.

The overall aim of amendment to priority 3 is:

Safe Accommodation - recognise that the threat of homelessness can be a key barrier to accessing help and that this threat can be used as a form of abuse. Providing a holistic response for survivors of domestic abuse and their children which offers safe housing and strong support and meets our populations diverse needs.

Our Safe Accommodation Strategy sits across 6 themes:

The amendment to priority 3 identifies a number of outcomes:

- Coordinated use of housing options to enable flexibility, access & safety
- A consistent Sanctuary offer for those that can be made safe in their homes and want to stay close by
- Enhance specialised support for LGBTQ+, those from minority ethnic backgrounds, those with disabilities (sensory, physical and learning), those who are over 50, men, and women who work (and may not have access to housing benefit).
- Strengthening the move on offer so that people can move out of refuge and other safe accommodation when they are ready to do so
- Consistently funded support for children in safe accommodation, both for children from Kent and those who are from other local authority areas

Summary of Key Findings:

The updates to the strategy specifically focus on increasing access across protected groups, the strategy updates therefore support the 2010 Equality Act. We find the impact of this work to be positive across all groups. The flexibility inherent in adopting principals of the Whole Housing Approach & strengthening Sanctuary Scheme provision means that protected groups who may experience additional barriers to accessing traditional accommodation services are offered alternative safe accommodation options. This flexibility will increase safety for people who do not chose to move out of area, for people who do not want to leave a home specifically adapted for their physical needs, and for those whose refuge options can be more limited (men, large families & those with complex needs). These options sit alongside refuge to make a more complete safe accommodation offer. Whether this increased focus on accommodation based support has a knock-on effect in the support offered in community services is being monitored by KCC as required through the statutory guidance.

Section B – Evidence

Note: For questions 9, 10 & 11 at least one of these must be a 'Yes'. You can continuing working on the EQIA in the App, but you will not be able to submit it for approval without this information.

<p>9. Do you have data related to the protected groups of the people impacted by this activity? Answer: Yes/No</p>	<p>Yes</p>
<p>10. Is it possible to get the data in a timely and cost effective way? Answer: Yes/No</p>	<p>Yes</p>

11. Is there national evidence/data that you can use? <i>Answer: Yes/No</i>	Yes
12. Have you consulted with Stakeholders? <i>Answer: Yes/No</i> <i>Stakeholders are those who have a stake or interest in your project which could be residents, service users, staff, members, statutory and other organisations, VCSE partners etc.</i>	Yes
13. Who have you involved, consulted and engaged with? <i>Please give details in the box provided. This may be details of those you have already involved, consulted and engaged with or who you intend to do so with in the future. If the answer to question 12 is 'No', please explain why.</i>	
<p>There was an informal consultation with partners on the development of the draft, this included presentation at each district's Domestic Abuse Forum, a multiagency group that brings together a broad range of professionals to coordinate services and tackle domestic abuse within each district of Kent & Medway. Following design work a formal consultation is taking place which includes the Equality Impact Assessment. Forums and participation groups have been invited to take part in the consultation, either through sharing the formal consultation with members or through a participatory presentation at their form meeting. Invites have gone to Kent Forums including older people, people with mental illness, people with physical disabilities and people organising Food Banks and the Keeping Safe Delivery Group that looks at community safety for people with learning disabilities. This will be taken to Voluntary & Community Sector subgroups on the 8 September 2021, the Domestic Abuse Tactical Group and Domestic Abuse Local Partnership Board on the 16 September 2021. The strategy will also be shared with Safeguarding Boards and the Community Safety Partnerships (as well as driving engagement through partner websites. Inherent in the strategy and Local Partnership Board's approach will be an ongoing commitment to harnessing a diverse range of survivor's voices for those who have accessed and have not accessed services.</p> <p>This approach means an ongoing gap analysis is taken forward and that the voices that inform strategy are not just those for whom the current service has worked. For those who have engaged in services this is proposed to include direct service feedback via text surveys as well as utilising pre-existing psychoeducational groups by inviting members to an additional session to include feedback on their journey into services. For those not accessing services there will be ongoing research through Kent Analytics which targets demographic groups who are less likely to engage with services as well as utilising pre-existing groups, forums & internal channels for feedback on established themes.</p>	
14. Has there been a previous equality analysis (EQIA) in the last 3 years? <i>Answer: Yes/No</i>	Yes
15. Do you have evidence/data that can help you understand the potential impact of your activity? <i>Answer: Yes/No</i>	Yes
Uploading Evidence/Data/related information into the App <i>Note: At this point, you will be asked to upload the evidence/ data and related information that you feel should sit alongside the EQIA that can help understand the potential impact of your activity. Please ensure that</i>	

you have this information to upload as the Equality analysis cannot be sent for approval without this.

Section C – Impact

16. Who may be impacted by the activity? Select all that apply.

Service users/clients <i>Answer: Yes/No</i>	Yes	Residents/Communities/Citizens <i>Answer: Yes/No</i>	Yes? (increased awareness/working with businesses etc)
Staff/Volunteers <i>Answer: Yes/No</i>	Yes – as relates to staff training and awareness?		

17. Are there any positive impacts for all or any of the protected groups as a result of the activity that you are doing? Answer: Yes/No **Yes**

18. Please give details of Positive Impacts

Age:

Domestic abuse has a detrimental impact on children; the Domestic Abuse Act explicitly recognises children as victims in their own right if they see, hear, or otherwise experience the effects of abuse. The strategy takes a 'whole family' approach highlighting the importance of the needs of children and recognising trauma that can be experienced and aims to strengthen the support available to children residing in safe accommodation. The strategy acknowledges the inter-generational dimension of domestic abuse and the effect of trauma on individual health.

This strategy aims to address concerns about the impact on children of domestic abuse and young people adopting violent/victims patterns in relationships or towards other family members. This strategy does not explore domestic abuse in people under 16 as it follows the governmental definition of abuse as occurring to those who are 16 and over.

Police data in Kent shows that the age group most likely to report DA is between 25 to 34 years old, however there is no upper age limit to being a victim or perpetrator of domestic abuse. The strategy recognises current under reporting of domestic abuse in those under 25 and over 65. It makes a commitment to reviewing services across the Partnership to ensure they meet the needs of all age groups.

Age & Safe Accommodation:

The strategy reflects a need to promote better knowledge and understanding of how domestic abuse affects older people to enable earlier intervention. Referrals into domestic abuse services drop off when clients reach 50 but research tells us that older women stay in abusive relationships twice as long as younger women, are more likely to be living with their perpetrator, more likely to be in a current relationship with their partner, and much more likely to be abused by a family member. These factors increase their risk. One in four domestic homicides involve people over 60.

Addendum to Priority 3 of the strategy adopts a whole housing approach that will enable survivors of abuse to access safe accommodation that is flexible. This will enable clients who experience additional barriers to access a number of different safe accommodation options, finding one that best suits their needs. For instance, an older person who may not want to enter shared accommodation refuge, may have additional care or mobility needs might prefer to stay in their own home and have additional safety measures provided. Consistent Sanctuary Scheme provision with the associated support also increases flexibility of support for older clients This ensures that groups who do not feel refuge is the appropriate service for them are offered a safe accommodation option.

The strategy also has a focus on increasing awareness of available support options through strong social media and communications. This reflects both internal communications to raise awareness within staff teams, and external communication to ensure that people know that support is available.

For younger people, the strategy reflects the fact that children will now be considered victims of domestic abuse right if the witness, hear or experience domestic abuse. There will be consistently funded support for children in safe accommodation, both for children from Kent and those who are from other local authority areas. This support will

help children to process their emotions and experiences and offer a safe space to explore healthy family relationships.

Disability:

Data collected by Safe Lives suggests that people with a disability may be more likely to experience DA than those who do not have a disability and they may experience it for longer before seeking help (further information below).

The strategy recognises the role and intersectionality of disability, with other protected characteristics such as sex and age, and that people with a disability may experience additional difficulties or barriers in seeking support services and challenging abusive relationships.

The strategy recognises the interrelationship between vulnerabilities including poor mental health and DA. It makes a pledge to work to address both the physical and mental health needs of an individual and their family. The strategy also recognises the link between mental health, problematic drug and alcohol use and abuse.

Disability & Safe Accommodation:

The 2021 Needs Assessment noted a lack of accessible accommodation options within refuge for those with limited mobility, presenting a barrier to accessing this form of DA support. The flexibility offered by the whole housing approach & consistent sanctuary offer recognises the diverse housing needs of survivors of domestic abuse.

The strategy also notes the need to increase awareness of barriers to access through additional training to staff, and to increase awareness of available support options through strong social media and communications.

Sex:

Women are twice as likely than men to experience domestic abuse, are more likely to be a victim of domestic homicide and the vast majority of perpetrators are men (for more detail please see below). However, the strategy also recognises that the numbers of men reporting domestic abuse are increasing, and that there may be additional barriers to men reporting domestic abuse based on social expectations.

The strategy supports the development of services which understand the needs of the whole family including male and female children. This is particularly relevant for families where male children may be teenagers and approaching adulthood.

Safe Accommodation & Sex:

In 2021 all refuge spaces were for women and two children; a whole housing approach will increase accessibility to safe accommodation via exploring additional housing options and sanctuary schemes for people in larger families and men who currently cannot currently access refuge.

Gender Identity:

Although data is reasonably limited on this protected characteristic The Scottish Transgender Alliance suggest that the majority of transgender people have experienced emotional, physical or sexual abuse from a partner or ex-partner, therefore people who are transgender are often survivors of domestic abuse. It is therefore essential that the strategy recognises the needs of this group.

Transgender 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.

Safe Accommodation & Gender Identity:

Trans women are able to access refuges across Kent, however significant barriers exist in reporting abuse and accessing accommodation-based services. As well as the flexibility offered by the whole housing approach and consistent sanctuary scheme offer, media and communications should promote Kent & Medway Services as available, knowledgeable and supportive of all gender expressions and the abuse experienced within different relationships.

For trans men or non-binary people their gender identity may prove an additional barrier for reporting, believing that support services are only available to women. Ensuring that media and communications publicise the universality of access for a range of safe accommodation options, including sanctuary, dispersed housing and refuge is important.

Race

Using statistical analysis (shown in attached evidence) there may be significant under reporting of DA within this protected characteristic. The strategy highlights and works to address the under reporting of DA within Black, Asian and Minority Ethnic communities. It seeks to ensure culturally aware services for survivors from these communities. As discussed below the strategy highlights the importance of the development of community capacity and increasing work with the voluntary community.

Very little information is available about traveller communities and domestic abuse, however there is a need to work with this community to increase awareness of the services and support available to those experiencing domestic abuse.

The strategy highlights forced marriage as a form of domestic abuse and looks to raise awareness and support (intersectionality with race, disability, sex and belief).

Safe Accommodation & Race:

The strategy notes the need to investigate and work to overcome barriers and ensure provision is holistic and meets diverse needs. The data and evidence (attached) suggest that the ethnicity profile of those accessing Kent's refuges have a higher proportion of people from a minority ethnic background than the Kent population. This reflects the national nature of refuge provision and Kent's proximity to diverse areas including London.

Religion and Belief

The strategy discusses the development of community capacity including working with the voluntary and community sector to increase awareness and identification of domestic abuse. This links to the above point around under reporting across minority groups.

The strategy highlights the requirement for collective responses across services achieved through promoting better knowledge of violence and abuse while promoting healthy relationships.

The strategy draws attention to honour-based violence (HBV) including forced marriage as part of domestic abuse and violence. The associated joint action plan must build on working with local communities with our partners to continue to challenge these behaviours. We recognise HBV as an intersecting issue between culture and religion and that increasing understanding of its root in each case can lead to better outcomes for individuals.

Interfaith forums have been used to increase awareness and discussion amongst faith leaders of domestic abuse. This should be picked up in action planning going forward.

Sexual Orientation

Statistics suggest that people in gay relationships are just as likely as those in heterosexual relationships to experience domestic abuse (please see below). The Office of National Statistics has found that bisexual women are nearly twice as likely to have experienced partner abuse in the last 12 months than heterosexual women (10.9% compared with 6.0%).¹

Gay, lesbian and bisexual people may experience additional barriers to reporting abuse, for example through 'outing'. They may also have to challenge the view of domestic abuse as occurring only within heterosexual contexts. As with other groups it is likely that there is currently under reporting of domestic abuse in gay and lesbian relationships.

The strategy acknowledges the need to ensure that support is available for all survivors of abuse, and that support services can be tailored to the needs of people in the context of their protected characteristics including sexual orientation.

Safe Accommodation & Sexual Orientation:

Under reporting here also effects referrals into safe accommodation services, although in the 2021 Needs Assessment update the number of LGB women in refuge did reflect the Kent population. Ensuring communications expand the view of who domestic abuse effects combats the idea that services are only available for a small subsection of survivors.

Pregnancy and Maternity:

Pregnancy may be a trigger for domestic abuse to commence or escalate (more details within data analysis). It is also a time when survivors may be at elevated risk. Domestic violence is associated with an increase in rates of miscarriage, low birth weight, premature birth, foetal injury, and foetal death.

The NHS, and public health (health visiting service) are part of the Kent and Medway Domestic Abuse and Sexual Violence Executive and therefore part of this Strategy's governance processes. Having collective agreement on the vision and aims of services across partners should have a positive impact for this protected characteristic.

Carer's Responsibilities:

There is minimal national and local intelligence about elder abuse and the abuse which a carer may suffer from the person they are caring for. Local Authorities have a statutory duty established through the Care Act to take action against abuse of elderly people and support the wellbeing of carers.

Older people may experience abuse in multiple forms including neglect by carers (who are often older themselves), carers may also experience abuse by those they are caring for, for example if the person they are caring for has dementia. As with all protected characteristics intersectionality may also influence experience.

The Domestic Abuse Act defines domestic abuse as being between two people who are 'personally connected'; as intimate partners, ex-partners, family members or individuals who share parental responsibility for a child. Carer's who do not fall within these categories would not be considered to be perpetrating domestic abuse but would still necessitate a safeguarding approach.

Intrafamilial abuse or adolescent to parent violence is a very hidden form of abuse but is becoming more recognised. Domestic abuse services focus on the survivor and will support survivors if the perpetrator is a person under the age of 16.²

¹ Office for National Statistics (2018) 'Women most at risk of experiencing partner abuse in England and Wales: years ending March 2015 to 2017'
<https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/womenmostatriskofexperiencingpartnerabuseinenglandandwales/yearsendingmarch2015to2017>

² Home Office: Information guide – adolescent to parent violence and abuse (APVA)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/732573/APVA.pdf

Negative Impacts and Mitigating Actions

The questions in this section help to think through positive and negative impacts for people affected by your activity. Please use the Evidence you have referred to in Section B and explain the data as part of your answer.

19. Negative Impacts and Mitigating actions for Age

a) Are there negative impacts for age? Answer: Yes/No (If yes, please also complete sections b, c, and d).	No
b) Details of Negative Impacts for Age	
c) Mitigating Actions for age	
d) Responsible Officer for Mitigating Actions - Age	

20. Negative Impacts and Mitigating actions for Disability

a) Are there negative impacts for Disability? Answer: Yes/No (If yes, please also complete sections b, c, and d).	No
b) Details of Negative Impacts for Disability	
c) Mitigating Actions for Disability	
d) Responsible Officer for Mitigating Actions - Disability	

21. Negative Impacts and Mitigating actions for Sex

a) Are there negative impacts for Sex? Answer: Yes/No (If yes, please also complete sections b, c, and d).	No
b) Details of Negative Impacts for Sex	
c) Mitigating Actions for Sex	

d) Responsible Officer for Mitigating Actions - Sex	
22. Negative Impacts and Mitigating actions for Gender identity/transgender	
a) Are there negative impacts for Gender identity/transgender? Answer: Yes/No (If yes, please also complete sections b, c, and d).	No
b) Details of Negative Impacts for Gender identity/transgender	
c) Mitigating actions for Gender identity/transgender	
d) Responsible Officer for Mitigating Actions - Gender identity/transgender	
23. Negative Impacts and Mitigating actions for Race	
a) Are there negative impacts for Race? Answer: Yes/No (If yes, please also complete sections b, c, and d).	No
b) Details of Negative Impacts for Race	
c) Mitigating Actions for Race	
d) Responsible Officer for Mitigating Actions - Race	
24. Negative Impacts and Mitigating actions for Religion and belief	
a) Are there negative impacts for Religion and Belief? Answer: Yes/No (If yes, please also complete sections b, c, and d).	No
b) Details of Negative Impacts for Religion and belief	

c) Mitigating Actions for Religion and belief	
d) Responsible Officer for Mitigating Actions - Religion and belief	
25. Negative Impacts and Mitigating actions for Sexual Orientation	
a) Are there negative impacts for sexual orientation. Answer: Yes/No (If yes, please also complete sections b, c, and d).	No
b) Details of Negative Impacts for Sexual Orientation	
c) Mitigating Actions for Sexual Orientation	
d) Responsible Officer for Mitigating Actions - Sexual Orientation	
26. Negative Impacts and Mitigating actions for Pregnancy and Maternity	
a) Are there negative impacts for Pregnancy and Maternity? Answer: Yes/No (If yes, please also complete sections b, c, and d).	No
b) Details of Negative Impacts for Pregnancy and Maternity	
c) Mitigating Actions for Pregnancy and Maternity	
d) Responsible Officer for Mitigating Actions - Pregnancy and Maternity	
27. Negative Impacts and Mitigating actions for marriage and civil partnerships	
a) Are there negative impacts for Marriage and Civil Partnerships? Answer: Yes/No (If yes, please also complete sections b, c, and d).	No
b) Details of Negative Impacts for Marriage and Civil Partnerships	

c) Mitigating Actions for Marriage and Civil Partnerships	
d) Responsible Officer for Mitigating Actions - Marriage and Civil Partnerships	
28. Negative Impacts and Mitigating actions for Carer's responsibilities	
a) Are there negative impacts for Carer's responsibilities? Answer: Yes/No (If yes, please also complete sections b, c, and d).	No
b) Details of Negative Impacts for Carer's Responsibilities	
c) Mitigating Actions for Carer's responsibilities	
d) Responsible Officer for Mitigating Actions - Carer's Responsibilities	