

Equality Impact Assessment

1. An Equality Impact Assessment (EIA) is a document that summarises how the council has had due regard to the public sector equality duty (Equality Act 2010) in its decision-making. Although there is no legal duty to produce an EIA, the Council must have **due regard** to the equality duty and an EIA is recognised as the best method of fulfilling that duty. It can assist the Council in making a judgment as to whether a policy or other decision will have unintended negative consequences for certain people and help maximise the positive impacts of policy change. An EIA can lead to one of four consequences:
 - (a) No major change – the policy or other decision is robust with no potential for discrimination or adverse impact. Opportunities to promote equality have been taken;
 - (b) Adjust the policy or decision to remove barriers or better promote equality as identified in the EIA;
 - (c) Continue the policy – if the EIA identifies potential for adverse impact, set out compelling justification for continuing;
 - (d) Stop and remove the policy where actual or potential unlawful discrimination is identified.

Public sector equality duty

2. The Equality Act 2010 places a duty on the council, when exercising public functions, to have due regard to the need to:
 - (a) Eliminate discrimination, harassment and victimisation;
 - (b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - (c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it (ie tackling prejudice and promoting understanding between people from different groups).
3. These are known as the three aims of the general equality duty.

Protected characteristics

4. The Equality Act 2010 sets out nine protected characteristics for the purpose of the equality duty:
 - Age
 - Disability
 - Gender reassignment
 - Marriage and civil partnership*
 - Pregnancy and maternity
 - Race
 - Religion or belief
 - Sex
 - Sexual orientation

*For marriage and civil partnership, only the first aim of the duty applies in relation to employment.

Due regard

5. Having 'due regard' is about using good equality information and analysis at the right time as part of decision-making procedures.
6. To 'have due regard' means that in making decisions and in its other day-to-day activities the council must consciously consider the need to do the things set out in the general equality duty: eliminate discrimination, advance equality of opportunity and foster good relations. This can involve:
 - removing or minimising disadvantages suffered by people due to their protected characteristics.
 - taking steps to meet the needs of people with certain protected characteristics when these are different from the needs of other people.
 - encouraging people with certain protected characteristics to participate in public life or in other activities where it is disproportionately low.
7. How much regard is 'due' will depend on the circumstances. The greater the potential impact, the higher the regard required by the duty. Examples of functions and decisions likely to engage the duty include: policy decisions, budget decisions, public appointments, service provision, statutory discretion, decisions on individuals, employing staff and procurement of goods and services.
8. In terms of timing:
 - Having 'due regard' should be considered at the inception of any decision or proposed policy or service development or change.
 - Due regard should be considered throughout development of a decision. Notes shall be taken and kept on file as to how due regard has been had to the equality duty in research, meetings, project teams, consultations etc.
 - The completion of the EIA is a way of effectively summarising this and it should inform final decision-making.

Armed Forces Community

9. As part of the council's commitment to the Armed Forces Community made through the signing of the Armed Forces Covenant the council's Cabinet agreed in November 2017 that potential impacts on the Armed Forces Community should be considered as part of the Equality Impact Assessment process.
10. Accordingly, due regard should also be had throughout the decision making process to potential impacts on the groups covered by the Armed Forces Covenant:
 - Current serving members of the Armed Forces (both Regular and Reserve)
 - Former serving members of the Armed Forces (both Regular and Reserve)
 - The families of current and former Armed Forces personnel.

Case law principles

11. A number of principles have been established by the courts in relation to the equality duty and due regard:
 - Decision-makers in public authorities must be aware of their duty to have 'due regard' to the equality duty and so EIA's must be attached to any relevant committee reports.
 - Due regard is fulfilled before and at the time a particular policy is under consideration as well as at the time a decision is taken. Due regard involves a conscious approach and state of mind.

- A public authority cannot satisfy the duty by justifying a decision after it has been taken.
- The duty must be exercised in substance, with rigour and with an open mind in such a way that it influences the final decision.
- The duty is a non-delegable one. The duty will always remain the responsibility of the public authority.
- The duty is a continuing one so that it needs to be considered not only when a policy, for example, is being developed and agreed but also when it is implemented.
- It is good practice for those exercising public functions to keep an accurate record showing that they have actually considered the general duty and pondered relevant questions. Proper record keeping encourages transparency and will discipline those carrying out the relevant function to undertake the duty conscientiously.
- A public authority will need to consider whether it has sufficient information to assess the effects of the policy, or the way a function is being carried out, on the aims set out in the general equality duty.
- A public authority cannot avoid complying with the duty by claiming that it does not have enough resources to do so.

The Equality and Human Rights Commission has produced helpful guidance on “Meeting the Equality Duty in Policy and Decision-Making” (October 2014). It is available on the following link and report authors should read and follow this when developing or reporting on proposals for policy or service development or change and other decisions likely to engage the equality duty. [Equality Duty in decision-making](#)

Lead officer:	Sylvia Roberts
Decision maker:	Jo Fox
Decision: • Policy, project, service, contract • Review, change, new, stop	Domestic Abuse Policy New assessment
Date of decision: The date when the final decision is made. The EIA must be complete before this point and inform the final decision.	June 2026
Summary of the proposed decision: • Aims and objectives • Key actions • Expected outcomes	The Domestic Abuse Policy outlines how the organisation will identify, support, and protect people experiencing domestic abuse, including ensuring safe housing options, safeguarding actions, partnership working, and staff training. The policy aligns with the Domestic Abuse Act 2021 and aims to provide a consistent, trauma-informed response.

- Who will be affected and how? - How many people will be affected?	This policy will benefit:- - Adult and child victims/survivors of domestic abuse - Staff supporting people affected by domestic abuse - Partner agencies (police, health, VAWG services) - Households at risk of homelessness due to domestic abuse	
Information and research: - Outline the information and research that has informed the decision. - Include sources and key findings.	Evidence Used to Inform This Assessment:- - Domestic Abuse Act 2021 - Local needs assessments and MARAC data - Office for National Statistics (ONS) domestic abuse prevalence statistics - Local stakeholder feedback (IDVAs, children’s services, refuge providers) - Complaints, case reviews and Safeguarding Adult Reviews (SARs)	
Consultation: - What specific consultation has occurred on this decision? - What were the results of the consultation? - Did the consultation analysis reveal any difference in views across the protected characteristics? - What conclusions can be drawn from the analysis on how the decision will affect people with different protected characteristics?	A 6 week online consultation was carried out during January and February.	
Assess the relevance of the decision to people with different protected characteristics and assess the impact of the decision on people with different protected characteristics.		
Protected characteristic	Relevance to Decision High/Medium/Low/None	Impact of Decision Positive (Major/Minor) Negative (Major/Minor) Neutral
<u>AGE</u> Elderly	high	The policy recognises domestic abuse against all ages , including older people who are often hidden victims. They may experience hidden forms of abuse and may rely on carers.

Middle age	medium	The policy recognises domestic abuse against all ages , including older people who are often hidden victims.
Young adult	high	Young people (16–17) are legally recognised as victims under the Domestic Abuse Act 2021. They can face specific vulnerabilities, including limited financial independence.
Children	medium	statutory safeguarding duties apply directly.
<u>DISABILITY</u> Physical	high	accessibility, dependency and isolation significantly affect risk and support options.
Mental	high	People with learning disabilities may struggle to disclose abuse. mental health impacts vulnerabilities, trauma responses and risk assessment.
Sensory	medium	The policy embeds trauma-informed practice, which benefits people with cognitive or psychological disabilities.
<u>GENDER RE-ASSIGNMENT</u>	Medium	Policy states non-discrimination and access for trans and non-binary people and encourages individualised risk and housing assessments. Trans people may fear exclusion from single-sex provision.
<u>MARRIAGE/CIVIL PARTNERSHIP</u>	Medium	Policy treats all relationship statuses equally. Recognises abuse can occur within marriage, separation or informal relationships.
<u>PREGNANCY/MATERNITY</u>	High	Recognises pregnancy as a high-risk period for escalation of abuse. Prioritises safe accommodation for pregnant survivors.

<u>RACE</u>	high	Acknowledges additional barriers such as language, immigration status and cultural stigma. Promotes interpretation services and culturally competent practice. Communities facing honour-based abuse may fear statutory services.
<u>RELIGION OR BELIEF</u>	medium	Policy emphasises respect for religious practices in accommodation choices. Recognises faith-related abuse patterns (e.g., spiritual coercion). Some faith groups may view domestic abuse as a private matter, increasing hidden harm.
<u>SEX</u> Men	medium	Supports male victims through inclusive language and universal access. Male victims may underreport due to stigma.
Women	high	Recognises domestic abuse as disproportionately affecting women and girls. Women fleeing abuse may need female-only spaces.
<u>SEXUAL ORIENTATION</u>	medium	Policy includes LGBTQ+ survivors who often face additional stigma and lower service visibility.
<u>ARMED FORCES COMMUNITY</u> Regular/Reserve personnel	low	May experience unique barriers to seeking help (e.g., fear of job impact). Policy supports them equally and signposts specialist military charities.
Former service personnel	low	May face trauma-related vulnerabilities; the policy's trauma-informed approach supports them.

Service families	low	Recognises mobility, isolation, and risk of coercive control in postings; policy pathways remain accessible regardless of service status.
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Mitigating negative impact: Where any negative impact has been identified, outline the measures taken to mitigate against it.	Age (Elderly, Middle Age, Young Adults, Children) Mitigations: • Provide information in accessible formats (large print, audio, simplified text). • Train staff to identify age-specific patterns of abuse (e.g., elder abuse, adolescent-to-parent abuse). • Ensure suitable accommodation for young people (e.g., specialist placements for 16–17). • Strengthen safeguarding pathways for children including automatic referral to Children’s Services. • Offer support aligned with older adults’ needs (e.g., carer-related abuse, financial control).	
	Disability (Physical, Mental, Sensory) Mitigations: • Ensure temporary and refuge accommodation includes accessible units; prioritise accessible placements. • Provide communication support such as BSL interpreters, Easy Read materials, and sensory-appropriate environments. • Apply trauma-informed practice consistently to support people with mental health conditions. • Work with specialist disability services to support safety planning and advocacy. • Allow flexibility for longer appointments, alternative communication methods, and support persons.	
	Gender Reassignment / Trans Community Mitigations: • Case-by-case placement decisions balancing the safety and dignity of trans people and others in shared accommodation. • Provide staff training on gender identity, confidentiality, respectful language and how to support trans survivors. • Clear policy statement confirming non-discrimination and eligibility for support. • Signposting to trans-inclusive domestic abuse services where relevant.	
	Marriage & Civil Partnership Mitigations: • Provide access to legal advice, including around separation, injunctions, financial orders, and property rights.	

	• Screen for economic abuse and offer support with benefits, budgeting, and access to independent finance. • Promote confidentiality to ensure victims can seek help without alerting partners.	
	Pregnancy & Maternity Mitigations: • Prioritise safe housing for pregnant victims and families with infants. • Avoid placement into unsuitable accommodation (shared bathrooms, upper-floor units without lifts). • Strengthen links with midwifery, health visiting, and safeguarding services to ensure holistic support. • Ensure rapid safety planning as pregnancy is a known high-risk period.	
	Race / Ethnicity Mitigations: • Always use professional interpreters (never family members). • Provide translated materials where appropriate. • Partner with community groups to increase trust and awareness of services. • Specialist pathways for victims with No Recourse to Public Funds (NRPF). • Cultural competence training for staff (honour-based abuse, immigration-linked control, community stigma).	
	Religion or Belief Mitigations: • Respect dietary, cultural, and worship needs in temporary accommodation. • Provide staff training on spiritual/religious forms of coercion and control. • Ensure placements allow for modesty, gender-specific preferences, or prayer space where safe and feasible.	
	Sex (Men and Women) Mitigations: • Provide access to gender-specific safe spaces, including women-only refuge when needed. • Ensure information and support is explicitly inclusive of male victims. • Staff training to combat stigma affecting male victims and encourage disclosure. • Safety planning that recognises gendered patterns of harm, especially VAWG (violence against women and girls).	
	Sexual Orientation (LGBTQ+) Mitigations: • Ensure confidentiality, especially around sexual orientation and “outing” risks. • Provide safe placements suitable for LGBTQ+ survivors, avoiding spaces that may expose them to hostility.	

	• Staff training on same-sex domestic abuse dynamics and barriers to reporting. • Partner with LGBTQ+ community organisations for further support.
	Armed Forces Community (Regular, Reserve, Former Personnel, and Families) Mitigations: • Signpost to specialist Armed Forces charities (e.g., SSAFA, RBL, Defence Transition Services). • Recognise mobility, posting patterns and isolation that may make seeking help difficult; offer flexible appointments (phone/video). • Train staff on military culture and potential barriers such as fear of impact on career or honour. • Ensure access to trauma-informed mental health support tailored to veterans (e.g., Combat Stress). • Make clear that service families have equal access regardless of serving member's status or deployment.

Is the decision relevant to the aims of the equality duty?

Guidance on the aims can be found in the EHRC's [Essential Guide](#), alongside fuller [PSED Technical Guidance](#).

Aim	Yes / No / N/A
1) Eliminate discrimination, harassment and victimisation	Yes
2) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it	Yes
3) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it	Yes

Conclusion: • Consider how due regard has been had to the equality duty, from start to finish. • There should be no unlawful discrimination arising from the decision (see guidance above). • Advise on whether the proposal meets the aims of the equality duty or whether adjustments have been made or need to be made or whether any	Due regard to the Public Sector Equality Duty has been applied throughout the development of the Domestic Abuse Policy. Consideration of the three elements of the duty—eliminating discrimination, advancing equality of opportunity, and fostering good relations—was embedded from the earliest stages of drafting, through research, consultation, and assessment of impacts across all protected characteristics and the Armed Forces Community. Evidence from national legislation, local data, multi-agency feedback and best practice has been used to ensure that the needs of diverse groups have been understood and addressed. No unlawful discrimination is expected to arise from implementation of the policy. Where potential adverse impacts were identified—such as accessibility barriers for disabled survivors, safety considerations for trans individuals in single-sex spaces, or cultural and language barriers for ethnic
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residual impacts are justified. How will monitoring of the policy, procedure or decision and its implementation be undertaken and reported?	minority groups—appropriate mitigations have been built into the policy and associated procedures. These include the use of interpreters, trauma-informed practice, accessible accommodation pathways, gender-specific provision where required, and strengthened safeguarding mechanisms. As a result, no residual negative impacts remain that cannot be mitigated or justified. The proposal meets all three aims of the equality duty. It actively advances equality by improving access to safe accommodation, widening awareness of support options, and ensuring consistent responses for all victims and survivors. The policy fosters good relations by promoting inclusive practice, reducing stigma around seldom-heard groups, and encouraging collaboration across statutory, voluntary, and specialist organisations. The adjustments made during the EIA process strengthen these outcomes further. Monitoring of the policy and its implementation will take place through routine collection and review of service-user data, including demographic information aligned to protected characteristics. Outcomes will be reviewed through quarterly performance monitoring, MARAC learning, safeguarding reviews, feedback from partner agencies, and case audits within Housing and Community Safety. Any patterns of unequal access or unintended negative impacts will be reported through operational management structures and used to inform future amendments to the policy. An annual review of both the policy and this Equality Impact Assessment will ensure ongoing compliance with the equality duty.
EIA completion date:	2nd March 2026