

**City of York Council**  
**Equalities Impact Assessment**

**Who is submitting the proposal?**

<b>Directorate:</b>	Housing and Communities Directorate		
<b>Service Area:</b>	Housing Services		
<b>Name of the proposal :</b>	Domestic Abuse Resident & Tenant Policy		
<b>Lead officer:</b>	Tiana Brown		
<b>Date assessment completed:</b>	21/11/2024		
<b>Names of those who contributed to the assessment :</b>			
<b>Name</b>	<b>Job title</b>	<b>Organisation</b>	<b>Area of expertise</b>
Tiana Brown	DAHA Project Co-Ordinator	City Of York Council	Domestic Abuse within Housing

## **Step 1 – Aims and intended outcomes**

1.1	<p><b>What is the purpose of the proposal?</b></p> <p>Please explain your proposal in Plain English avoiding acronyms and jargon.</p>
	<p>The domestic abuse resident &amp; tenant policy is a new policy to be introduced which supports the Domestic Abuse Act (2021) and associated guidelines that requires local authorities in England and Wales to provide support to victims of domestic abuse and ensure those who are perpetrators are brought to account. The policy builds on existing pathways, approaches and responses to domestic abuse as well as providing guidance on how we will improve current practice. To ensure victims and survivors of domestic abuse receive a victim centred, supportive response.</p> <p>An independent needs assessment and a wider system review was undertaken by the specialist domestic abuse charity SafeLives in 2022 across City of York and North Yorkshire. Safe lives are a UK wide charity dedicated to ending domestic abuse for everyone for good and they work with organisations across the UK to transform the response to domestic abuse. Safe lives were commissioned to provide support and coordination to City of York Council and North Yorkshire County Council in carrying out the Safe Accommodation needs assessment in line with our statutory duty under Part 4 of the Domestic Abuse Act 2021. This report outlines their findings following review and analysis of data provided by agencies and organisations across City of York and North Yorkshire, and from hearing the voice and experiences of victims and survivors. The report, finalised in 2023, provided insight on the areas within City of York Council that would need improvement, to ensure we are meeting our statutory duty and victims and survivors experience the best response. Within this report the housing service's response was one of the areas highlighted for improvement, this led to the introduction of the DAHA accreditation to best support improving the housing response to domestic abuse.</p> <p>Supported by Public Health, Housing have committed to achieving the Domestic Abuse Housing Alliance Accreditation (DAHA) in 2023. This accreditation gives social housing providers and local authorities a framework on best practice responses for domestic abuse victims/survivors, to develop and embed within housing services at a strategic and operational level. Within this framework 'policies and procedures' are an area of focus to develop. A requirement for this accreditation is to have a stand-alone domestic abuse resident policy outlining our commitment and response to domestic abuse victims/survivors. This policy meets the required standard towards DAHA and is an important step.</p>

	The proposal demonstrates how this policy will ensure as a housing service we recognise those with protected characteristics, how these could be barriers for accessing support and how we will work with victims and survivors of domestic abuse to overcome these barriers to raise equality of opportunity and access to support.
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<b>1.2</b>	<b>Are there any external considerations?</b> (Legislation/government directive/codes of practice etc.)
	<p>This proposal is responding to the Social Housing Regulation Act (2023) and associated Neighbourhood and Community Consumer Standard which requires local authorities with housing stock in England and Wales to provide information about specialist support agencies to victims of domestic abuse, to consider staff training on how to support people affected by domestic abuse and how to make referrals. The policy will clearly show how the team will respond to reports of domestic abuse and consider the unique needs of individuals including their protected characteristics.</p> <p>In December 2019 the Government was elected with a manifesto commitment to “support all victims of domestic abuse and pass the Domestic Abuse Bill” originally introduced in the last Parliament. The act aims to ensure that victims have the confidence to come forward and report their experiences, safe in the knowledge that the state will do everything it can, both to support them and their children and pursue the abuser. This year the government demonstrated their commitment to tackling domestic abuse as their pledge is to halve violence against women and girls in a decade. The 2021 domestic abuse act included changes to the homeless reduction act that guarantee’s that all victims/survivors will be in priority need for housing and will keep a secure tenancy in social housing if they need to escape an abuser, demonstrating the important link between domestic abuse and housing, and the governments directive on this subject.</p>

<b>1.3</b>	<b>Who are the stakeholders and what are their interests?</b>
	<p><b>Stakeholders:</b> All CYC’s housing services customers, CYC staff working within statutory homeless services and allocation of social housing, CYC staff working in hostels, support services and working with CYC tenants, local area coordinators, IDAS, Public Health, children and adult social services, North Yorkshire Police, Changing lives, Halo Project, Foundation (+Choices), Refugee resettlement team and Neighbourhood enforcement team. The stakeholders are integral to support with embedding a co-ordinated community response to tackling domestic abuse within the City of York.</p>

1.4	<p><b>What results/outcomes do we want to achieve and for whom?</b> This section should explain what outcomes you want to achieve for service users, staff and/or the wider community. Demonstrate how the proposal links to the Council Plan (2019- 2023) and other corporate strategies and plans.</p>
	<p>This policy will empower victims/survivors to feel confident, safe, and reassured to disclose domestic abuse as well as supporting staff to feel confident and knowledgeable on signs/indicators of domestic abuse, which in turn they are able to provide early intervention and support. Being firm and clear on our zero-tolerance approach to abuse and holding perpetrators to account provides further reassurance to victims/survivors.</p> <p>The policy provides practical advice and support regarding domestic abuse to our City of York Council tenants, residents, and leaseholders. Setting consistent standards and guidance regarding our practices as a housing service to staff and the public.</p> <p>The Council Plan 2023 to 2027, One City, For All, sets a strong ambition to increase opportunities for everyone living in York to live healthy and fulfilling lives, as follows:</p> <ul style="list-style-type: none"> <li>• Health-Improve health and wellbeing and reduce health inequalities, taking a Health in All Policies Approach.</li> <li>• Equalities and Human Rights- Equality of opportunity</li> </ul> <p>This policy supports the equalities and human rights priority, providing clear standards on how our response will be accessible for all, our commitment to understanding intersectionality and removing those systemic barriers for all to have support.</p> <p>As the policy sets out a robust and supportive response to victims/survivors it also demonstrates a commitment to 'how the council operates' priority within the council plan, providing improvement on our customer experience to make a positive difference.</p> <p>The Council Plan demonstrates commitment to all York residents to enjoy happier, healthier, longer lives, in homes that meet their needs, able to actively participate in their communities, with access to the right support at the right time. Having this stand-alone domestic abuse policy which sets out the housing service's response to domestic abuse and its commitment to a co-ordinated community response for domestic abuse victims/survivors. Demonstrating our understanding that there are York residents</p>

	experiencing domestic abuse and their specific needs require prioritising and addressing to ensure their happier, healthier, longer lives which links directly to the council plan and its 10-year strategies.
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## Step 2 – Gathering the information and feedback

<b>2.1</b>	<b>What sources of data, evidence and consultation feedback do we have to help us understand the impact of the proposal on equality rights and human rights?</b> Please consider a range of sources, including: consultation exercises, surveys, feedback from staff, stakeholders, participants, research reports, the views of equality groups, as well your own experience of working in this area etc.	
	<b>Source of data/supporting evidence or consultation details:</b>	<b>Reason for using:</b>
	Domestic Abuse Housing Alliance Task & Finish Group: This is an operational group which has a wide membership of all housing managers/Team Leaders, charities which work with victims, survivors and perpetrators of domestic abuse, domestic abuse specialist 'by and for' charities, public health and other partner agencies working directly with those with lived experience.	This policy was created collaboratively via the Domestic Abuse Housing Alliance Task & Finish group. As this group has varied members with extensive expertise within the domestic abuse and housing field, we were able to create a policy that internal and external agencies were able to shape together and consider all feedback and views. The domestic abuse specialist 'by and for service' were able to provide invaluable input to support with intersectionality and protected characteristics to ensure all victims/survivors were able to understand the policy and a vast range of advice and support services were included.
	Domestic Abuse Local Partnership Board: Which has a wide membership including statutory agencies such as the police and probation, social housing providers, commissioned services, and charities.	This policy was consulted via members of the domestic abuse local partnership board which is also the strategic governance of the Domestic Abuse Housing Alliance project.

Domestic Abuse Housing Alliance: These are the specialists supporting the domestic abuse housing alliance accreditation, working with the project lead on securing the accreditation for City Of York Council.	This policy was consulted on with the regional lead from the Domestic Abuse Housing Alliance, they provided valuable feedback to ensure the policy would meet the standards for the accreditation, in which it would need to demonstrate and touch on the following 8 priorities: Staff development/Support, perpetrator accountability, Intersectionality & Anti Racism, Victim/Survivor safety, Partnership & Collaboration, Policies & Procedures, Publicity & Awareness raising and Safety led case management.
Tenant Scrutiny?	This section will be updated after tenant scrutiny has taken place on 3 <sup>rd</sup> Dec 24.
The Council Plan 2023 to 2027, One City, For All <a href="https://www.york.gov.uk/council-plan-1/one-city-2023-2027">https://www.york.gov.uk/council-plan-1/one-city-2023-2027</a>	In the creation of this policy the council plan's priorities and how this policy can directly support this plan was included throughout consultation.
North Yorkshire & City Of York Domestic Abuse Joint Strategy 2024 – 2028 <a href="https://www.york.gov.uk/downloads/file/9587/north-yorkshire-and-city-of-york-domestic-abuse-strategy-2024-2028">https://www.york.gov.uk/downloads/file/9587/north-yorkshire-and-city-of-york-domestic-abuse-strategy-2024-2028</a>	Details the priorities and commitments from North Yorkshire Council & City of York Council and partner agencies on tackling domestic abuse across the county.

### Step 3 – Gaps in data and knowledge

<b>3.1</b>	<b>What are the main gaps in information and understanding of the impact of your proposal? Please indicate how any gaps will be dealt with.</b>	
<b>Gaps in data or knowledge</b>		<b>Action to deal with this</b>
Case supervision /performance management		Updating case management system to support with performance management
		Training which will include a mixture of internal and professional training. A domestic abuse procedure outlining how to put the policy into practice within staff's roles will also support with staff's confidence to implement the policy.

#### **Step 4 – Analysing the impacts or effects.**

<b>4.1</b>	<b>Please consider what the evidence tells you about the likely impact (positive or negative) on people sharing a protected characteristic, i.e. how significant could the impacts be if we did not make any adjustments? Remember the duty is also positive – so please identify where the proposal offers opportunities to promote equality and/or foster good relations.</b>		
<b>Equality Groups and Human Rights.</b>	<b>Key Findings/Impacts</b>	<b>Positive (+) Negative (-) Neutral (0)</b>	<b>High (H) Medium (M) Low (L)</b>
<b>Age</b>	Someone of any age can be affected by domestic abuse. In the 2022/2023 financial year there were 2,069 domestic abuse related crimes recorded by North Yorkshire Police that had occurred in York. Of the 2,069 reported crimes, 72% of victims were female, typically aged between 20-39 years, whilst 73% of suspects were male of the same age range.	<b>Positive (+)</b>	



	<p>However domestic abuse is an underreported crime, In the year 2021/2022 the strategic needs assessment estimate tool suggests, a total number of victims or adults who have experienced domestic abuse since the age of 16 is 32,500.</p> <p>Within York the older population is growing year on year and has risen 12.7% since 2011 and there are currently 9,854 people over the age of 80 living in York. The needs assessment prevalence tool estimated that there were 1000 victims aged over 65 who will have experienced domestic abuse in 2022. Research and evidence show that those over 60 experience domestic abuse for much longer, on average 12.9 years compared to the national average of 4.5 years. Further evidence suggests, older people are more likely to normalise abusive behaviour and may not perceive themselves as being a victim due to generational knowledge gap.</p> <p>Training will be designed to inform staff that young people and older people can be affected by domestic abuse and specialist support is available. The policy should enable domestic abuse victims and survivors of all ages to get access to support more quickly and therefore help reduce future harm.</p>		
<b>Disability</b>	<p>The needs assessment which reviewed the current service provision landscape for safe accommodation between 2019 – 2022, looked at the number of victims identified who were disabled and unfortunately this was often not recorded therefore there was not accurate data between those dates.</p>	<b>Positive (+)</b>	

	<p>However, the estimate tool from the needs assessment, estimated that there were 3500 victims or survivors of domestic abuse who are disabled in City of York in 2022. Research and data have shown disabled people are twice as likely to experience domestic abuse because of their situational vulnerabilities, they also experience domestic abuse for longer periods of time, and more severe and frequent abuse than non-disabled people. Through training associated with the implementation of this policy and the accreditation, staff will be better skilled to spot the signs of domestic abuse and respond appropriately when working with disabled people.</p>		
<b>Gender</b>	<p>According to the needs assessment, the gender of victims reporting domestic abuse in North Yorkshire and in the City of York remained consistent across the two years 2019-20 to 2021-22, with between 67% and 68% of identified victims recorded as being female, and between 18% and 19% recorded as male. While domestic abuse can happen to all genders, women are particularly at higher risk. The policy is inclusive of all genders whilst training will acknowledge that domestic abuse is a gendered issue.</p>	<b>Positive (+)</b>	
<b>Gender Reassignment</b>	<p>According to the needs assessment, the gender of victims reporting domestic abuse in North Yorkshire and in the City of York across all two years, 5-6% of victims were recorded as unknown, and fewer than 1% of victims were recorded as identifying as non-binary, transgender or other, combined across all two years. The new policy is inclusive and people who have been through gender reassignment should not be adversely affected. National specialist support is available for</p>	<b>Positive (+)</b>	

	people from this community and staff will be made aware of this. We therefore anticipate that services will improve for people who have had their gender reassigned.		
<b>Marriage and civil partnership</b>	The Domestic Abuse Act 2021 recognises that domestic abuse can occur in a variety of intimate and family relationships and is not limited to persons within a marriage or civil partnership. There will be no detriment to married people or those in a civil partnership.	<b>Positive (+)</b>	
<b>Pregnancy and maternity</b>	During pregnancy there can be an increase or escalation in domestic abuse, this poses risks to unborn children and expectant mothers. This policy will improve awareness of domestic abuse and strengthen knowledge of referral pathways to reduce harm.	<b>Positive (+)</b>	
<b>Race</b>	7.3% of residents in York are from Black or minority ethnic groups, 5.5% are from White but non-British background and 10.8% were born outside the UK. There is evidence to show that black women are disproportionately affected by domestic abuse and have less confidence to report the abuse to authorities, this policy will improve opportunities to support victims and reduce harm to them. This new policy and the associated training that will follow focuses on breaking down barriers for people from minoritized groups so that they are able to access support. Within the policy we have committed to understanding and considering victims/survivors intersectional needs and ensuring there is support available to all including those subject to immigration control. Therefore, services should improve for people with lived experience with the protected characteristic of race.	<b>Positive (+)</b>	

<b>Religion and belief</b>	<p>The traditional relationship dynamic may be different in some cultures, and research shows that people within certain cultures may be more likely to suffer domestic abuse. This could have several effects including victims being more reluctant to report or resistant to their partner or any other personally connected person being arrested.</p> <p>In City of York there is a diverse community. Some residents have recently arrived in the UK and are not familiar with the legal protections afforded to victims of domestic abuse. Therefore, it is important to provide cultural awareness to staff of these communities and ensure that staff are trained about how domestic abuse, honour-based abuse, forced marriage and female genital mutilation may occur and how to respond. Training will include awareness raising of cultural issues and the importance of using independent translators when working with victims who do not speak English as well as improving our written translation services across the housing service. We anticipate that the service will improve for people in this category.</p>	<b>Positive (+)</b>	
<b>Sexual orientation</b>	<p>York has a higher-than-average LGBTQ+ population compared to the regional and national statistics (5.5% York, 3.0% region, 3.1% England &amp; Wales). Currently, there are not specific domestic abuse commissioned services for LGBTQIA people locally; however commissioned services are using innovative trauma-informed methods to meet the needs of this group. Training and this policy address the needs and importance of staff being able to signpost to national specialist services for support that meets their needs.</p>	<b>Positive (+)</b>	

<b>Other Socio-economic groups including :</b>	<b>Could other socio-economic groups be affected e.g. carers, ex-offenders, low incomes?</b>		
<b>Carer</b>	The policy covers all residents and tenants and there will be no detriment to carers.	<b>Positive (+)</b>	
<b>Low income groups</b>	The policy will apply to all residents and tenants including those on a low income, an element of domestic abuse can be economic abuse, and training will be provided to staff so that they have a better understanding of this. Economic abuse can have wide-reaching and long-lasting effects (such as bankruptcy) and can be a factor relating to homelessness and debts. By supporting people to obtain specialist support victims and survivors will be in a stronger position to move forward to rebuild their lives.	<b>Positive (+)</b>	
<b>Veterans, Armed Forces Community</b>	The policy covers all residents and tenants and there will be no detriment to veterans or members of the armed forces or their dependents.	<b>Positive (+)</b>	
<b>Other</b>	The policy covers all residents and tenants and there will be no detriment to any other socio-economic groups.	<b>Positive (+)</b>	
<b>Impact on human rights:</b>			
List any human rights impacted.	There are no human rights negatively impacted.	<b>Positive (+)</b>	

### **Use the following guidance to inform your responses:**

Indicate:

- Where you think that the proposal could have a POSITIVE impact on any of the equality groups like promoting equality and equal opportunities or improving relations within equality groups

- Where you think that the proposal could have a NEGATIVE impact on any of the equality groups, i.e. it could disadvantage them
- Where you think that this proposal has a NEUTRAL effect on any of the equality groups listed below i.e. it has no effect currently on equality groups.

It is important to remember that a proposal may be highly relevant to one aspect of equality and not relevant to another.

<b>High impact</b> (The proposal or process is very equality relevant)	There is significant potential for or evidence of adverse impact The proposal is institution wide or public facing The proposal has consequences for or affects significant numbers of people The proposal has the potential to make a significant contribution to promoting equality and the exercise of human rights.
<b>Medium impact</b> (The proposal or process is somewhat equality relevant)	There is some evidence to suggest potential for or evidence of adverse impact The proposal is institution wide or across services, but mainly internal The proposal has consequences for or affects some people The proposal has the potential to make a contribution to promoting equality and the exercise of human rights
<b>Low impact</b> (The proposal or process might be equality relevant)	There is little evidence to suggest that the proposal could result in adverse impact The proposal operates in a limited way The proposal has consequences for or affects few people The proposal may have the potential to contribute to promoting equality and the exercise of human rights

## Step 5 - Mitigating adverse impacts and maximising positive impacts

5.1	<p><b>Based on your findings, explain ways you plan to mitigate any unlawful prohibited conduct or unwanted adverse impact. Where positive impacts have been identified, what is been done to optimise opportunities to advance equality or foster good relations?</b></p>
<p>There is no unlawful or prohibited conduct predicted from this policy. This policy will improve services and should have no negative or unwanted adverse impact. Some of the positive impacts of this policy that have been identified are as follows:</p> <ul style="list-style-type: none"> <li>• Provides tenants/residents/service users with clear and succinct reassurance on what they can expect from our domestic abuse response.</li> <li>• Provides a commitment to a co-ordinated community response for domestic abuse victims/survivors. Setting out how we will work together with partner agencies to tackle domestic abuse as a multi-agency approach is paramount for victim/survivor safety.</li> <li>• Supporting the 2024 – 29 draft homeless strategy in which one of the key themes is ‘tackling domestic abuse’ within homelessness as well as legislation requirements within the homeless reduction act 2018.</li> <li>• Meeting requirements from the regulator. An expectation from the regulator is for social landlords to have a DA resident/tenant policy in place.</li> <li>• This policy will empower victims to feel confident, safe, and reassured to disclose domestic abuse and supports staff to feel confident and knowledgeable on signs/indicators of domestic abuse, which in turn they are able to provide early intervention and support. Being firm and clear on our zero-tolerance approach to abuse and holding perpetrators to account provides further reassurance to victims/survivors.</li> </ul>	

## Step 6 – Recommendations and conclusions of the assessment



6.1	<p><b>Having considered the potential or actual impacts you should be in a position to make an informed judgement on what should be done. In all cases, document your reasoning that justifies your decision. There are four main options you can take:</b></p>	
	<ul style="list-style-type: none"> <li>- <b>No major change to the proposal</b> – the EIA demonstrates the proposal is robust. There is no potential for unlawful discrimination or adverse impact and you have taken all opportunities to advance equality and foster good relations, subject to continuing monitor and review.</li> </ul>	
	<ul style="list-style-type: none"> <li>- <b>Adjust the proposal</b> – the EIA identifies potential problems or missed opportunities. This involves taking steps to remove any barriers, to better advance quality or to foster good relations.</li> <li>- <b>Continue with the proposal</b> (despite the potential for adverse impact) – you should clearly set out the justifications for doing this and how you believe the decision is compatible with our obligations under the duty</li> <li>- <b>Stop and remove the proposal</b> – if there are adverse effects that are not justified and cannot be mitigated, you should consider stopping the proposal altogether. If a proposal leads to unlawful discrimination it should be removed or changed.</li> </ul>	
	<p><b>Important:</b> If there are any adverse impacts you cannot mitigate, please provide a compelling reason in the justification column.</p>	
	<b>Option selected</b>	<b>Conclusions/justification</b>
	No major change to the proposal	<p>There is no unlawful discrimination, the policy supports and upholds accessibility, inclusion and intersectionality therefor improving quality and removing barriers for residents to access support. This policy communicates our organisation's culture, values, and philosophy, making it clear to employees, customers, and the community what they can expect from us as a council and housing provider.</p>

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## Step 7 – Summary of agreed actions resulting from the assessment

<b>7.1</b>	<b>What action, by whom, will be undertaken as a result of the impact assessment.</b>		
<b>Impact/issue</b>	<b>Action to be taken</b>	<b>Person responsible</b>	<b>Timescale</b>
Ensuring implementation across the whole of housing service to ensure the whole housing service is delivering the standards and best practices we have committed too.	Internal training, development of a domestic abuse procedure to support the policy, publication of the policy and management of performance via case review and KPI's.	DAHA co-ordinator in partnership with housing and communities, public health directorates and housing management of all levels.	6 months from policy being introduced – This is an estimated timeline and may be less or greater dependant on timescales to train housing colleagues

## Step 8 - Monitor, review and improve

8. 1	<p><b>How will the impact of your proposal be monitored and improved upon going forward?</b></p> <p>Consider how will you identify the impact of activities on protected characteristics and other marginalised groups going forward? How will any learning and enhancements be capitalised on and embedded?</p>
	<p>This Policy will be monitored by Housing Managers and case files audits will be undertaken as part of the Domestic Abuse Housing Alliance accreditation assessment. The Domestic Abuse Housing Alliance Strategic and operational Boards will monitor the introduction and embedding of the new policy. Progress will be reported to the York Domestic Abuse Local Partnership Board.</p> <p>We are planning to train our staff about intersectionality, and this new policy includes measures to improve the way that we work with customers who have more than one protected characteristic, or more complex needs and may need services to be delivered in a unique way to meet their individual needs. We will consider how staff may need to adapt service delivery to accommodate a person's neurodiversity.</p>

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