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Date: Friday, 04 October 2013

Overview and Scrutiny
Town Hall
Castle Circus
Torquay
TQ1 3DR

Dear Member

OVERVIEW AND SCRUTINY BOARD - WEDNESDAY, 9 OCTOBER 2013

I am now able to enclose, for consideration at the Overview and Scrutiny Board to be held on Wednesday, 9 October 2013, the following reports that were unavailable when the agenda was printed.

Agenda No	Item	Page
a)	Domestic Abuse Services in Torbay To consider the draft report of the Priorities and Resources Review Panel on Domestic Abuse Services in Torbay and to follow-up any outstanding issues.	(Pages 1 - 10)
b)	Re-modelling of accommodation services for victims of domestic abuse To consider the proposals in relation to the re-modelling of accommodation services for victims of domestic abuse including the results of the recent consultation exercise and the draft Equality Impact Assessment.	(Pages 11 - 29)

Yours sincerely

Kate Spencer
Overview and Scrutiny Lead



Domestic abuse services

*Information for Torbay Council's Overview and Scrutiny Board
9 October 2013*

What are the services Westward provides?

Westward has a validated track record of providing high quality outcomes-focused support services to a wide range of client groups across Torbay, Devon, Plymouth and Cornwall. These include people with mental health issues, alcohol or drug issues, a history of offending, people with learning, physical or sensory impairments and long term conditions, younger or older people with support needs, teenage parents and people at risk of domestic abuse or homelessness.

In addition to the 7,000 properties owned and managed by its subsidiaries Westcountry Housing and Tarka Housing, Westward provides preventative and early intervention services for 2,000 people. These include specialist, supported living and social enterprise projects, and sheltered housing schemes, agency-managed projects and a wide range of accommodation-based and floating support services, including client-commissioned services with personal budgets.

From our origins as a general needs local housing association in Torbay, we have diversified incrementally over the past 25 years to encompass work in reaching out to communities and individuals with complex and entrenched needs.

Since 1987 we have provided the accommodation that has housed the Torbay Refuge. In that period we have worked with a variety of agencies who have managed the support service. Since 2009, after competitive tender, we have provided both the support and management of the Refuge. Since 2009 we have also provided Torbay's Domestic Abuse Support Service (DASS).

The Torbay Refuge

a. What is the Torbay Refuge?

- Seven units of secure, shared, supported accommodation available to women and children fleeing domestic abuse, located at a confidential address in Torbay.
- Support and accommodation is offered for a maximum of twelve weeks for seven women and up to 21 children and babies at any one time.

b. Who is the Refuge for?

- The Refuge is for women and their children that are fleeing domestic abuse and who need housing and support.
- Placements at the Refuge include women with mental health support needs, alcohol and drug use, and families with complex needs. Staff are experienced in supporting families with these needs.

c. Where do Refuge clients come from?

- From April – September 2013, 16 clients have moved in to the Refuge.
- 25% of these have come from Torbay; 25% are from other Devon local authorities; 50% are from outside Devon.
- Women who have approached Torbay Housing Needs and Options directly (or who are placed in other emergency accommodation) are prioritised for the offer of places.

d. Where do Refuge clients move on to?

- From April – September 2013, 14 clients have moved on from the Refuge.
- 28% of these have gained accommodation in Torbay (private sector and registered providers); 72% have moved away from Torbay (private sector, registered providers, local authority, supported housing, friends)

e. Where else do Torbay victims of domestic abuse go for accommodation and support?

- In 2012/13 the Plymouth Refuge received 7 referrals from Torbay clients.
- In 2012/13 the Exeter Refuge received 2 referrals from Torbay clients (6 in 2011/12).
- The Refuge is part of national resource to enable women to move in and out of areas to reduce risks.
- We do not have data from the wider national network of Refuges about how many women and children from Torbay are accommodated in other parts of the country, or where they move on to.

f. How is the Refuge funded?

- The *accommodation-based services* are funded by rent and service charges made to residents.
- In 2013/14 the accommodation charge per unit per week is: £156.12
- This is made up of:
 - ~ Rent per week per unit: £60.50
 - ~ Eligible service charge per unit per week: £85.00
 - ~ Ineligible service charges per unit per week: £10.62
- In 2013/14 this represents an accommodation charge income of £56,000 per annum.
- The *support service* is funded by an annual contract income from Supporting People.
- In 2013/14 this Supporting People income is £105,000 per annum.

g. How much does the Refuge cost?

- In 2013/14 the total direct cost of providing accommodation-based *and* support services at the Refuge is budgeted at £142,000 per annum.
- The indirect costs of providing the services are budgeted at £19,000 per annum.

h. How is the Refuge staffed?

- The Refuge is staffed by experienced specialist domestic abuse staff, Monday – Friday 9am – 6 pm, Saturday 9am - 1pm.
- An emergency out of hours service is available every day for current residents and outreach clients, enabling immediate crisis intervention work, and quick response to current risks.

- The Refuge service is responsive to need and women in crisis have been able to access the Refuge within two hours of contact, once eligibility has been established.
- The staff team is made up of a Manager (supervising both the Refuge and DASS services), three Support Workers, one part time Children's Worker, relief staff and volunteer workers.

i. What do Refuge staff do?

- Carry out comprehensive risk assessments and safety plans at first point of contact.
- Provide individual needs-assessed and planned support sessions for women and children.
- Provide needs-led support including finding future safe accommodation, building networks and accessing community support, gaining education/work, gaining financial independence/stability, accessing health services etc, to encourage and support women and children to become free from future abuse, maintaining safety, and to secure an independent future.
- Deliver training courses for women and children, e.g. 'Helping Hands' (currently offered to children) 'You and Me Mum' and 'The Power to Change' (starting this Autumn and open to Refuge and DASS female clients) all of which support the understanding of domestic abuse, promote safety for both women and children, and aim to prevent future abusive relationships/risks to women and children.

j. What are the outcomes for clients of the Refuge service?

- In 2012/13, 30 clients made planned move ons on from the Refuge.
- Of those clients moving on in 2012/13, in all of the 21 indicators of the five domains of the national SP Outcomes Framework (Department for Communities and Local Government).
- for short-term services, clients of the Refuge clients achieved outcomes at more than 5% above the national benchmark (see the attached table).

k. How do we manage safety and risk?

- We complete the CAADA-DASH RIC (Co-ordinated Action Against Domestic Abuse - Domestic Abuse, Stalking and Harassment Risk Indicator Checklist) with all referrals.
- Risk assessments and safety planning are prioritised with every woman and child, to ensure reduced risk of current/future harm. These assessments and plans are continually reviewed.
- Through risk assessment, appropriate referrals are made to relevant agencies, including high risk victims referred to MARAC (Multi Agency Risk Assessment Conference).
- Westward staff attend monthly MARAC meetings as part of the local multi-agency approach to reduce domestic abuse, and risks of significant harm/homicide.
- Safeguarding children and adults is embedded and prioritised in the current Refuge service. The service has an appointed safeguarding lead officer and all staff are experienced and trained in identifying and reporting safeguarding issues.
- We provide confidential, secure accommodation.

l. How does the Refuge support partnership working?

- The Refuge works in partnership with Safer Communities (Torbay Council), Devon and Cornwall Police, Devon and Cornwall Probation, Children's Services (Torbay Council), Housing Services (Torbay Council), Torbay and South Devon Health and Care Trust,

other related voluntary, charitable and non-statutory domestic abuse support service provision, and the wider local community.

- The Refuge service supports the work of the IDVA service (Independent Domestic Violence Advocates) by providing support to women placed at the Refuge. This allows the IDVA provision to make best use of its resources.
- As a part of MARAC, Westward has hosted the monthly MARAC meeting at its Torquay offices free of charge.
- The Refuge service assists Torbay Council Housing Needs and Options service to meet its obligations under the 1996 Housing Act by gathering evidence of the circumstances of households claiming to be homeless, including domestic abuse, incorporating completion of the CAADA-DASH RIC and local connection before women are offered a place.

m. How does the Refuge support Torbay's strategic intentions?

- The Refuge service is an integral part of Torbay's Homelessness Strategy and assists the Council in meeting its vision, priorities and obligations.
- The Refuge service is a key priority in the current Torbay Council Homelessness Strategy (Priority 4).
- The Impact Assessment for the Strategy notes that 'The Strategy will have a positive impact on domestic abuse by commissioning services such as the women's refuge'
- The Refuge assists the Council to achieve the vision of the Strategy and its obligation under the Homelessness Act 2002 by ensuring sufficient specialist accommodation is and will be available for people who are or may become homeless. We do this by providing accommodation, appropriate support and robust safety planning for seven women and up to 21 children and babies at any one time.

Domestic Abuse Support Service (DASS)

n. What is DASS?

- The Domestic Abuse Support Service (DASS) is a resettlement and floating support service available to men and women victims of domestic abuse for up to nine months.
- DASS delivers a minimum of fifty units of floating support to enable clients to prioritise their safety, live independently and access specialist support as appropriate.
- DASS includes 30 units per annum of the Women's Safety Work service, giving support for the female victims of male perpetrators undertaking the IDAP programme (Integrated Domestic Abuse Programme) as a requirement of a court sentence. This is linked to the Probation 'Building Better Relationships' (BBR) programme.

o. Who is DASS for?

- DASS is a gender-neutral service, which works with both male, female and transgender victims of domestic abuse at flexible locations across Torbay, to support the attainment of their independent living.
- DASS is available to Torbay residents only.

p. How is DASS funded?

- The support service is funded by an annual contract income from Supporting People.
- In 2013/14 this Supporting People income is £120,000 per annum.

q. How much does DASS cost?

- In 2013/14 the total direct cost of providing DASS is budgeted at £120,000 per annum.
- The indirect costs of providing the services are budgeted at £16,000 per annum.

r. How is DASS staffed?

- DASS is staffed by experienced specialist domestic abuse staff.
- The staff team is made up of a Manager (supervising both the Refuge and DASS services) and four Support Workers (3.4 FTE).

s. What do the DASS staff do?

- Provide needs-led individual support and training (as i, above) to up to fifty clients at any one time, delivered flexibly across core/non-core hours and weekend hours as appropriate, taking into account domestic abuse incident reporting trends.
- Deliver thirty 30 units per annum of Women's Safety Work.

t. What are the outcomes for clients of the Refuge service?

- In 2012/13, 99 clients made planned move ons from DASS.
- Of those clients moving on in 2012/13, in all of the 21 indicators of the five domains of the national SP Outcomes Framework (Department for Communities and Local Government).
- for short-term services, clients of DASS achieved outcomes at more than 5% above the national benchmark (see the attached table).
- 97% of the clients moving on from DASS in 2012/13 achieved greater independence.

u. How do we manage safety and risk?

- All referrals to DASS are comprehensively assessed on the basis of needs and risk.
- Individual support and safety plans are established with all clients.
- DASS maintains all records and shares information and data with relevant stakeholders in a way that complies with local MARAC and Child Protection protocol and the Data Protection Act.
- As with the Refuge, safeguarding children and adults is embedded and prioritised in the DASS service. The service has an appointed safeguarding lead officer

v. How does DASS support partnership working?

- DASS works in partnership with Safer Communities (Torbay Council), Devon and Cornwall Police, Devon and Cornwall Probation, Children's Services (Torbay Council), Housing Services (Torbay Council), Torbay and South Devon Health and Care Trust, other related voluntary, charitable and non-statutory domestic abuse support service provision, and the wider local community.
- Staff have experience of multi-agency working work in partnership with relevant stakeholders to meet the needs of individual clients.

w. How does DASS support Torbay's strategic intentions?

- The work of DASS supports the objectives of the Council's Homelessness Strategy, which recognises domestic abuse and violent breakdown of relationships as significant causes of homelessness.
- The Strategy identifies the need to ensure early targeted intervention through family mediation and support services.
- The provision of DASS forms part of Torbay's strategic and co-ordinated community response to domestic abuse and its victims.

Westcountry Supported Housing Short Term Outcomes Monitoring

Torbay Refuge	30		Short Term Outcomes Monitoring Report 2012 - 2013					Status against National Average
	No. of Outcomes forms completed (YTD)	30	No. of people who had need	No. of people who had need met	% achieved positive outcome	% service target	% achieved nationally	
People who made a planned move on or planned end to the support service								
People whose move on or end to the support service resulted in greater independence								
1) Economic Wellbeing								
a) Did the client need support to maximise their income, including the receipt of the correct welfare benefits?			30	30	100%		91%	9%
b) Did the client need support to reduce overall debt?			16	14	88%		70%	18%
c) (i) Did the client need support to obtain paid work - is the client now in paid work?			5	5	100%		27%	73%
c) (ii) Did the client need support to obtain paid work - has participated in paid work?			5	5	100%		27%	73%
2) Enjoy and Achieve								
a) (i) Did the client need support to participate in training and education - participated?			12	12	100%		61%	39%
a) (ii) Did the client need support to participate in training and education - gained qualifications if appropriate?			3	3	100%		61%	39%
b) Did the client need support to participate in leisure/cultural/faith/informal learning?			18	17	94%		78%	16%
c) Did the client need support to participate in any work-like activities?			18	16	89%		58%	31%
d) (i) Did the client need support to establish contact with external groups / services?			29	29	100%		85%	15%
d) (ii) Did the client need support to establish contact with friends / family?			13	13	100%		85%	15%
3) Be Healthy								
a) Did the client need support to better manage their physical health?			29	29	100%		79%	21%
b) Did the client need support to better manage their mental health?			12	12	100%		74%	26%
c) Did the client need support to better manage their substance misuse issues?			6	5	83%		58%	25%
d) Is assistive technology/aids and adaptations helping the client maintain independence?			0	0	#DIV/0!		91%	#DIV/0!
4) Stay Safe								
a) (i) Did the client need support to maintain their accommodation and avoid eviction?			26	26	100%		71%	29%
a) (ii) Did the client need support to secure / obtain settled accommodation?			29	28	97%			97%
b) Did the client need support to comply with statutory orders?			1	1	100%		73%	27%
c) (i) Did the client need support to better manage self harm?			0	0	#DIV/0!		76%	#DIV/0!
c) (ii) Did the client need support to avoid causing harm to others?			17	17	100%		70%	30%
c) (iii) Did the client need support to minimise harm / risk of harm from others?			30	29	97%		81%	16%
5) Make a Positive Contribution								
a) Did the client need support in developing confidence and ability to have greater choice and / or control and / or involvement?			30	30	100%		84%	16%

Westcountry Supported Housing Short Term Outcomes Monitoring

Domestic Abuse Support Service (DASS)		Short Term Outcomes Monitoring Report 2012 - 2013						Status against National Average
No. of Outcomes forms completed (YTD)		No. of people who had need	No. of people who had need met	% achieved positive outcome	% service target	% achieved nationally		
99	People who made a planned move on or planned end to the support service People whose move on or end to the support service resulted in greater independence	85	83	98%		91%	7%	
85		61	100%			70%	30%	
96		46	46	100%			27%	73%
		46	46	100%		27%	73%	
1) Economic Wellbeing								
	a) Did the client need support to maximise their income, including the receipt of the correct welfare benefits?							
	b) Did the client need support to reduce overall debt?							
	c) (i) Did the client need support to obtain paid work - Is the client now in paid work?							
	c) (ii) Did the client need support to obtain paid work - has participated in paid work?							
2) Enjoy and Achieve								
	a) (i) Did the client need support to participate in training and education - participated?	47	46	98%		61%	37%	
	a) (ii) Did the client need support to participate in training and education - gained qualifications if appropriate?	16	15	94%		61%	33%	
	b) Did the client need support to participate in leisure/cultural/faith/informal learning?	68	67	99%		78%	21%	
	c) Did the client need support to participate in any work-like activities?	60	58	97%		58%	39%	
	d) (i) Did the client need support to establish contact with external groups / services?	91	91	100%		85%	15%	
	d) (ii) Did the client need support to establish contact with friends / family?	84	84	100%		85%	15%	
3) Be Healthy								
	a) Did the client need support to better manage their physical health?	55	55	100%		79%	21%	
	b) Did the client need support to better manage their mental health?	86	86	100%		74%	26%	
	c) Did the client need support to better manage their substance misuse issues?	18	18	100%		58%	42%	
	d) Is assistive technology/aids and adaptations helping the client maintain independence?	5	5	100%		91%	9%	
4) Stay Safe								
	a) (i) Did the client need support to maintain their accommodation and avoid eviction?	25	25	100%		71%	29%	
	a) (ii) Did the client need support to secure / obtain settled accommodation?	58	54	93%			93%	
	b) Did the client need support to comply with statutory orders?	4	4	100%		73%	27%	
	c) (i) Did the client need support to better manage self harm?	38	37	97%		76%	21%	
	c) (ii) Did the client need support to avoid causing harm to others?	19	18	95%		70%	25%	
	c) (iii) Did the client need support to minimise harm / risk of harm from others?	98	94	96%		81%	15%	
5) Make a Positive Contribution								
	a) Did the client need support in developing confidence and ability to have greater choice and / or control and / or involvement?	95	94	99%		84%	15%	



TORBAY REFUGE

PO Box 411,
Paignton, TQ4 9AQ
Tel: 01803 524594
Fax: 01803 559330

E-mail:

torbayrefuge@westwardhousing.org.uk
www.westwardhousing.org.uk

Application procedure






For further information on how to apply please contact the Refuge office on

01803 524594

Equal Opportunities

We have a firm commitment to ensure you are dealt with fairly and equally without discrimination or prejudice.

PROVIDING
WOMEN WITH CHOICE
AND CONTROL OVER
THEIR LIVES

If you or someone you know would like a Westcountry document on CD  or audio tape , in large print , in Braille , or translated into another language , please contact the Refuge:

01803 524594



Aim

The Torbay Refuge offers services for women (and their children) that are fleeing domestic abuse and need housing and support.

Our aim at the Refuge is to provide you with the opportunity to escape domestic abuse to a safe, confidential and comfortable environment.

We can give you time and support to help you to take control of your life, make decisions about your future and, to develop the skills to live in safety and independence in your own accommodation.

Accommodation

The Refuge consists of a safe house with 7 fully furnished rooms, most with en-suite facilities; sharing a large fully equipped kitchen with dining area.

There are excellent communal facilities including: a lounge, a well equipped children's play room, laundry facilities, a large back garden with a children's play area.

Staff are available Monday to Friday 9am - 6pm, and Saturday 9am – 1pm. An emergency telephone service is available during evenings, at weekends and other holidays.

Support

Our staff team will provide you with a support and advice service to meet your individual needs. With your allocated support worker, you will be able to identify areas of need and risk.

We will support you to develop risk management skills to keep you and your family safe and secure when you move on from the Refuge to live independently.

The goals you wish to achieve will be set out in your support plan and will be reviewed regularly to track your progress and agree the next steps. This process will also include any other agencies you may be linked with.

Our children's worker will meet with you and your children to assess how best to work with your family. This may include finding new schools, creative play sessions and bringing in specialist workers to work on specific issues to support children through this transition time.

We support most women at the Refuge for 12 weeks, although you may stay longer depending on your individual needs.

What you can expect from our support service

By engaging with our support service you can expect and be enabled to achieve the following outcomes:

- ✿ Develop the skills needed to keep yourself safe and secure, both in and outside of your home
- ✿ Access & know how to access a wide range of services and agencies
- ✿ Be independent but not isolated
- ✿ Look after your own health needs and wellbeing as well as that of your children
- ✿ Improve budgeting skills and acquire confidence in dealing with benefit claims and other officials
- ✿ Manage your own paperwork etc...
- ✿ Successfully find and move-on to independent accommodation
- ✿ Maintain good neighbourly relationships
- ✿ Establish a positive social network and gaining access to a wide range of other services
- ✿ Be able to access social/cultural activities & participate in the local community
- ✿ Develop new skills and grow in confidence
- ✿ Successfully attend college, apply for part-time employment, voluntary work experience or other meaningful occupation.



Agenda Item 5b



Title: **Remodelling Accommodation Services for Victims of Domestic Abuse**

Wards Affected: **All Wards in Torbay**

To: **Overview and Scrutiny Board** On: **9 October 2013**

Contact Officer: **Shelley Shaw / Frances Mason**

☎ Telephone: **208729**

✉ E.mail: **Shelley.shaw@torbay.gov.uk**

1. Key points and Summary

- 1.1 In July 2013 the Domestic Abuse Steering Group recommended a consultation on the delivery model of accommodation services for women and children fleeing domestic abuse.
- 1.2 The proposal was to change the delivery model from a refuge to a women and children only emergency accommodation service with outreach support.
- 1.3 A consultation was undertaken from 27 August to 25 September 2013 to establish views on the proposal with a variety of stakeholders, including current and past service users.
- 1.4 A decision on the proposal was due to be made at a meeting of the Council on 17th October 2013. This item has been deferred to allow more time for further consultation to be undertaken and a detailed specification to be developed in conjunction with our partners, including Westcountry Housing.
- 1.5 Feedback received to date as part of the consultation included views about the current model of service as well as the proposed model, the consultation report which outlines the preliminary findings is available as supporting documentation to this report in appendix 1.
- 1.6 A draft Equality Impact Assessment (EIA) has also been undertaken in relation to this proposal and has been updated to include the consultation responses received to date. A final EIA will be completed once the extended consultation period has closed. The draft EIA is attached in appendix 2.
- 1.7 The decision to be made by Council will be on the outline specification (commercially confidential), procurement timetable and indicative budget.

2. Introduction

- 2.1 Torbay Council currently commissions 7 refuge spaces and 50 domestic abuse

outreach places (this means 50 people are supported in the community at any one time as well as those in the refuge). The contract is held by Westcountry Housing and has been in place since April 2009. The contract was issued for 3 years with the option to extend for a further 3 years.

- 2.2. The Domestic Abuse Steering Group discussed commissioning plans in their meeting in July 2013. This included agreement that future services should include all three strands from the Domestic Abuse Strategy, i.e. interventions for perpetrators, support/recovery for victims and supported accommodation.
- 2.3. The Domestic Abuse Steering Group held a meeting in July 2013 on what the future supported accommodation model could look like. The meeting agreed a process of consultation was required on a proposal to alter the model from a refuge to emergency accommodation.

3. Consultation Process

- 3.1. Following the development of the proposal, consultation was undertaken with those people and key stakeholders who would be affected should the proposal be implemented. Consultation was carried out with the following groups:

- Current provider of the refuge, Westcountry Housing
- Women currently accommodated in the refuge and those who have previously stayed in refuge accommodation
- Local and national partner organisations
- Wider members of the public.

- 3.2. A summary of the feedback received to date can be found in both the attached consultation report and EIA. The key issues raised in relation to this proposal include the following:

- There will be a lack of an all inclusive accommodation service where women can access other services.
- Accommodation services need to be matched against the needs of the clients.
- The refuge is part of national, recognisable model of service provision.
- There is the potential for increased demand on other services.
- There is the potential for an increased risk to women's safety.
- The refuge currently provides services for children.
- Women need to be able to access accommodation outside of the areas in which they live.
- The proposed model may provide more flexibility and targeted support.

- 3.3. In response to feedback received the consultation period for this proposal has been extended and will now remain open until 30th October 2013. Consideration is being given to whether any further targeted consultation needs to take place in addition to the on-line questionnaire.

4. Planned Next stages

- 4.1. Co-production of an outline specification to include key partners, stakeholders, people who have used services, the current provider, and potential providers.

- 4.2. Council Members to make a decision on 5th December 2013 on the outline specification (commercially confidential), procurement timetable and indicative budget.

Name of Head of Business Unit	Frances Mason / Caroline Taylor
Title of Head of Business Unit	Head of Supporting People / Director of Adult Services

Appendices

Appendix 1 Consultation report

Appendix 2 Equality Impact Assessment

Documents available in members' rooms

Background Papers:

The following documents/files were used to compile this report:

Not applicable

Equality Impact Assessment (EIA): Remodelling of accommodation services for victims of domestic abuse

Name (Key Officer/Author):	Shelley Shaw / Fran Mason	Business Unit:	Supporting People
Position:	Service Development Officer / Supporting People Manager	Tel:	
Date started:	17.7.2013	Email:	
Date of Current Version:	1.10.2013		

Since the Equality Act 2010 came into force the council has continued to be committed to ensuring we provide services that meet the diverse needs of our community as well as ensure we are an organisation that is sensitive to the needs of individuals within our workforce. This Equality Impact Assessment (EIA) has been developed as a tool to enable business units to fully consider the impact of proposed decisions on the community.

This EIA will evidence that you have fully considered the impact of your proposal / strategy and carried out appropriate consultation with key stakeholders. The EIA will allow Councillors and Senior Officers to make informed decisions as part of the council's decision-making process.

Executive Lead / Head Sign off (*when final version*):

Executive Lead(s)	Executive Head:	Caroline Taylor – Director of Adult Services
Date:	Date:	

Relevance Test – ‘A Proportionate Approach’

Not all of the proposals or strategies we put forward will be ‘relevant’ in terms of the actual or potential impact on the community in relation to equality and vulnerable groups. For instance, a report on changing a supplier of copier paper may not require an EIA to be completed whereas a report outlining a proposal for a new community swimming pool or a report proposing a closure of a service would.

Therefore before completing the EIA please answer the following questions. If you answer ‘yes’ to any of the questions below you must complete a full EIA.

1)	Does this report relate to a key decision?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
2)	Will the decision have an impact (i.e. a positive or negative effect/change) on any of the following:		

	<ul style="list-style-type: none"> • The Community (including specific impacts upon the vulnerable or equality groups) • Our Partners • The Council (including our structure, 'knock-on' effects for other business units, our reputation, finances, legal obligations or service provision) 	Y Y Y	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
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DRAFT

Section 1: Purpose of the proposal/strategy/decision

No	Question	Details
1.	Clearly set out the proposal and what is the intended outcome?	<p>The development of this proposal was initiated by the Domestic Abuse Steering Group, of which key partners are Police, Torbay Council (through Safer Communities, Children's Services, Housing Services, and Public Health), the Clinical Commissioning Group and Probation. The Steering Group felt that a new model for accommodation services may be able to provide a more equitable service for women fleeing domestic abuse. The Steering Group have set out that they will ensure that there are clear alternative options for accommodation available if the decision is made to move from a refuge model to an emergency accommodation model so that there will continue to be emergency accommodation provision for women and children fleeing domestic abuse.</p> <p>The proposal is to change the accommodation provision offered to women and children fleeing domestic abuse from a refuge model to an emergency accommodation model.</p> <p>The reasons for the proposed change are:</p> <ul style="list-style-type: none"> • To provide equity of service to all women and children fleeing domestic abuse in terms of the initial advice they receive prior to placement, and the services they receive • To provide greater value for money for the Local Authority by delivering emergency accommodation linked to specialist outreach support <p>The objectives of the proposal are:</p> <ul style="list-style-type: none"> • Housing Options Service to provide a range of accommodation options to women and children fleeing domestic abuse; including a women only accommodation unit and accommodation that meets the needs of women with more complex needs such as drug and alcohol users. • Housing Options Service staff to be trained to undertake Domestic Abuse specific Risk Assessments prior to placement to ensure appropriate placements are made • Delivery of fast track outreach intervention to victims of domestic abuse placed into emergency accommodation provisions • Compliance with homelessness legislation. Currently when women and children are placed in the refuge their housing options interview is undertaken after placement, this means that Torbay Council has not had the opportunity to undertake an investigation into whether the person is eligible for assistance prior to this placement (s.184 of Housing Act 1996). Further this means that the range of homelessness prevention options have not been explored prior to placement, alternative options would include reconnecting to an area with support networks, alternate accommodation moves into the Private Rented Sector under Localism. • To ensure women and children using the service do not become homeless or lose their support.

No	Question	Details
		<p>The intended outcomes of this proposal are:</p> <ul style="list-style-type: none"> • A more equitable service people fleeing domestic abuse • Women and their children are supported to achieve independent living and sustainable accommodation. • Housing Services involvement in all pre-placement work as per s.184 Housing Act 1996 and to undertake CAADA DASH Risk Assessment (Domestic Abuse risk assessment tool) • Where it is appropriate and safe to do so, a focus on supporting women and children from Torbay. <p>Consultation on this proposal will inform the recommendation for decision and any further specifications which will be developed as a result of the decision.</p>
2.	<p>Who is intended to benefit / who will be affected?</p>	<p>The Supporting People (SP) programme funds and develops support services to help vulnerable people live independent lives. Support prevents homelessness and promotes independence through help with budgeting, accessing services, building social networks, resettling into a new home, maintaining tenancy and mortgage conditions and so on.</p> <p>The refuge service is for women and children fleeing domestic abuse and they will be most affected. Clients currently within the refuge model will need support in the transition to the new emergency accommodation model as well as continuing to have their own individual move on plan. Women and children requiring an emergency safe bed space in the future will have their needs met in a different way.</p> <p>Key stakeholders affected by this proposal are:</p> <ul style="list-style-type: none"> • Women and children fleeing domestic abuse • Current provider of the refuge service, Westcountry Housing • Health Services including drug and alcohol services, GPs, Torbay Hospital • Torbay Council services including Housing Options Service, Children's Services, Safer Communities • Devon and Cornwall Police.

Section 2: Equalities, consultation and engagement

Torbay Council has a moral obligation as well as a duty under the Equality Act 2010 to eliminate discrimination, promote good relations and advance equality of opportunity between people who share a protected characteristic and people who do not.

The **equalities, consultation and engagement** section ensures that, as a council, we take into account the Public Sector Equality Duty at an early stage and provide evidence to ensure that we fully consider the impact of our decisions / proposals on the Torbay community.

Evidence, consultation and engagement

No	Question	Details																																																																					
3.	Have you considered the available evidence?	<p>Supporting People currently commission Westcountry Housing to provide 7 units (beds / rooms) of refuge provision. The number of women and children placed in the refuge is outlined in the table below:</p> <table border="1"> <thead> <tr> <th></th> <th>2012/13</th> <th>2011/12</th> </tr> </thead> <tbody> <tr> <td>Number of commissioned Units</td> <td>7</td> <td>14</td> </tr> <tr> <td>Number of women placed</td> <td>28</td> <td>46</td> </tr> <tr> <td>Number of women with a local connection</td> <td>5</td> <td>18</td> </tr> <tr> <td>Number of children</td> <td>44</td> <td>40</td> </tr> </tbody> </table> <p>In 2011/12, 7 commissioned units were available at the refuge and a further 7 were dispersed units in the community. These dispersed units were de-commissioned in March 2012 in agreement with the provider.</p> <p>The length of stay for women in the refuge is shown in the table below:</p> <table border="1"> <thead> <tr> <th>Length of stay in the service for all clients who died or left the service in the quarter. Number of clients who used the service for:</th> <th>Q1</th> <th>Q2</th> <th>Q3</th> <th>Q4</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Up to 3 months</td> <td>4</td> <td>1</td> <td>3</td> <td>8</td> <td>16</td> </tr> <tr> <td>Between 3 and 6 months</td> <td>1</td> <td>1</td> <td>3</td> <td>2</td> <td>7</td> </tr> <tr> <td>Between 6 and 9 months</td> <td>3</td> <td>1</td> <td>1</td> <td>1</td> <td>6</td> </tr> <tr> <td>Between 9 and 12 months</td> <td>1</td> <td>0</td> <td>0</td> <td>0</td> <td>1</td> </tr> <tr> <td>Between 1 year and 18 months</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Between 18 months and 2 years</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Over 2 years</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>Total</td> <td>9</td> <td>3</td> <td>7</td> <td>11</td> <td>30</td> </tr> </tbody> </table>		2012/13	2011/12	Number of commissioned Units	7	14	Number of women placed	28	46	Number of women with a local connection	5	18	Number of children	44	40	Length of stay in the service for all clients who died or left the service in the quarter. Number of clients who used the service for:	Q1	Q2	Q3	Q4	Total	Up to 3 months	4	1	3	8	16	Between 3 and 6 months	1	1	3	2	7	Between 6 and 9 months	3	1	1	1	6	Between 9 and 12 months	1	0	0	0	1	Between 1 year and 18 months	0	0	0	0	0	Between 18 months and 2 years	0	0	0	0	0	Over 2 years	0	0	0	0	0	Total	9	3	7	11	30
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No	Question	Details
		<p>In 2012-13 the Housing Options Services accommodated 60 clients in emergency accommodation who were at risk of becoming homeless due to violent breakdown of relationship involving partner.</p> <p>In respect of future demand, it is not possible to determine the actual number of people who experience domestic abuse. Data from the draft Strategic Assessment 2013/14 reports:</p> <p>In 2011/12 there were 3,187 incidents recorded by the police of domestic abuse. Latest national data indicates that approximately 2 out of 5 domestic abuse incidents are reported to the police and 44% of victims are victimised more than once in a year. Repeat victimisation accounted for almost three quarters of domestic abuse incidents. If we apply these national findings to Torbay figures, there would have been an estimated 8,172 incidents of domestic abuse in 2011/12 with 3,940 victims, 1,734 of which would have been repeat victims.</p> <p>Safer Communities engaged with 138 victims (women and men) of domestic abuse, including repeat victims through the IDVA service (Independent Domestic Violence and Abuse Service)</p> <p>150 victims (women and men) entered the Domestic Abuse Support Service.</p> <p>In 2012/13 50% of women placed in the refuge were under Multi Agency Risk Assessment Conferences (MARAC) arrangements meaning they were assessed at medium or high risk of harm.</p> <p>In May 2013, there were 170 children in Torbay who were the subject of Child Protection Plans and domestic abuse was a factor in 100 of these cases (59%).</p>

No	Question	Details
4.	How have you consulted on the proposal?	<p>Following the development of the proposal, consultation was undertaken with those people and key stakeholders who would be affected should the proposal be implemented. Consultation was carried out with the following groups:</p> <p><u>Current provider of the refuge, Westcountry Housing:</u></p> <ul style="list-style-type: none"> • An initial meeting which took place on 27th August • Advised of the proposals and provided details along with a question and asked to respond by 18th September. • Westcountry Housing were advised of how further representations could be made in writing. <p><u>Women currently accommodated in the refuge and those who have previously stayed in refuge accommodation:</u></p> <ul style="list-style-type: none"> • 12 women took part in focus groups which took place on 23rd and 24th September 2013 • Advised of the proposal and took part in a facilitated discussion regarding the current service model and the proposal. <p><u>Local and national partner organisations including:</u></p> <ul style="list-style-type: none"> • Departments across Torbay Council which provide domestic abuse services, Devon and Cornwall Police, Drug and Alcohol services, Clinical Commissioning Group, Refuge, Women's Aid, Victim Support • Partners were sent information outlining the current model and the proposed model along with a question plan for them to return. • Partners were also advised they could make representations in writing via email and letter. • Information was issued to partners on 4th September with an initial response dates of 18th September which was then extended to the 25th September 2013. • Responses have been received from five organisations to date <p><u>Wider members of the public (non service users):</u></p> <ul style="list-style-type: none"> • Online survey was developed to allow any member of the public to have their say in relation to this proposal. • This survey was open between 6th September and 25th September 2013 and 252 responses have been received to date. <p>In response to feedback received the consultation period for this proposal has been extended and will now remain open until 30th October 2013. Consideration is being given to whether any further targeted consultation needs to take place in addition to the on-line questionnaire.</p>
5.	Outline the key findings	<p>Initial feedback from the Domestic Abuse Steering Group was that a new model for accommodation services may be able to provide a more equitable service for individuals fleeing domestic abuse. The Housing Option Services supported the development of an alternative proposal so they can effectively undertake their statutory responsibility. There was also</p>

No	Question	Details
		<p>support from Children's Services who stated that 59% of their child protection cases involved domestic abuse (including families who are accommodated at the refuge) and these families could be better supported to reconnect with areas where they have existing support networks available.</p> <p>A full report on the consultation feedback received to <u>date</u> is available and provided as supporting documentation to this EIA. A summary of the feedback from all methods of consultation received to date is outlined below:</p> <p>The current model:</p> <ul style="list-style-type: none"> • The refuge provides peer support for women, they make friends with others who are in similar situations and have this support network available. Friendships are maintained once women move into the community. • There is on-site specialist support for women and their children. • Children at the refuge are supported by access to support workers, play workers, but also get to build friendships with children in similar situations. • The refuge provides safe and secure accommodation for women. • Staff are always available at the refuge. • The refuge is part of a national network and they are a well know model of service provision. • The refuge does not meet current demand as it is and there is a waiting list for services. • There can sometimes be delays for women in getting the right type of room at the refuge while they wait for one to become available. • The current model does not match accommodation to need, there needs to be a variety of provision available and support needs to be client focussed. • Living in shared accommodation such as refuge can have a negative impact on some women with complex needs. • Refuge accommodation can be identifiable over time. • Dynamics of shared accommodation mean that there can be disagreements between women. <p>The Proposed model:</p> <ul style="list-style-type: none"> • The majority of respondents (91.3%) who completed the online consultation disagreed with the proposal. • The model needs further clarity on how temporary accommodation will be provided and procured. • The proposed model does not appear to consider support for domestic abuse victims holistically. • There will be a lack of independent specialist advice and support. • There will be a lack of provision for women who need to leave their homes urgently. • Risk that without a refuge women will choose to stay with their partners. • Concerns regarding the capacity of housing officers to undertake assessments. • Concerns that assessments will be carried out by less experienced staff. • There is the potential for increased demand on other services which may result in greater expenditure.

No	Question	Details
		<ul style="list-style-type: none"> • No information relating to how children will be supported and safeguarded. • It is considered too risky to place women in the private rented sector. • Women need the support of a refuge and without one will not develop the skills they need for successful independence. • There is a need for women to be able to move out of area and if priority is given to local people then some women from outside Torbay may be put at greater risk. • Lack of an out of hours service. • Greater isolation for women who will not receive the peer support they currently value in the refuge. • The proposed model may provide more flexibility and more targeted support. • Through the proposed model individuals will be matched more effectively against their needs. • The proposed model will offer opportunities for improved safeguarding with smoother processes for sharing information. • The proposed model provides a better change for successful move on. <p>Please note the above represents a summary of the consultation findings to date and this will be updated once the extended consultation period has closed.</p>
<p>6. Page 22</p>	<p>What amendments may be required as a result of the consultation?</p>	<p>TO BE UPDATED ONCE CONSULTATION UNDERTAKEN:</p> <p>The following considerations need to be taken into account in the development of any service specification for domestic abuse services including accommodation services (all of these issues were raised through the consultation activity):</p> <ul style="list-style-type: none"> • Staff levels, both in the Housing Options Services and Outreach Workers to ensure that demand for services can be met. Outreach workers should be accessible and respond to enquiries in a timely manner. • For women to discuss their situations can be difficult so consideration should be given to where interviews can take place, as well as whether childcare can be provided. • The process to be accommodated under a new model should be quicker than the current model. • Ensuring the confidentiality of emergency accommodation is critical, accommodation must be safe and secure. • Women who have experienced domestic abuse find a lot of peer support in being accommodated together and are able to share their experiences. • The standards of emergency accommodation. • Provision of services for children such as play sessions, assisting them to have more normality in their life and support for getting children back in to school. • Providing a variety of options for accommodation. <p>Please note the above represents a summary of the consultation findings to date and this will be updated once the extended consultation period has closed.</p>

Positive and negative equality impacts TO BE UPDATED ONCE CONSULTATION UNDERTAKEN

No	Question	Details		
7.	Identify the potential positive and negative impacts on specific groups	<p><i>It is not enough to state that a proposal will affect everyone equally. There should be more in-depth consideration of available evidence to see if particular groups are more likely to be affected than others – use the table below. You should also consider workforce issues. If you consider there to be no positive or negative impacts use the 'neutral' column to explain why. EVERY BOX MUST BE COMPLETED – if there is no impact please state either 'No Positive Impact' or 'No Negative Impact'.</i></p> <p>** Views presented are those presented in the consultation and further work will need to be undertaken to identify if there is an evidential basis for the concern / issue raised.</p>		
		Positive Impact	Negative Impact	Neutral Impact
	Older or younger people	<p>In May 2013, 59% of child protection cases involve domestic abuse and this includes families placed in the refuge from out of the area. **Some of these families could have been better supported to reconnect to areas where support networks are available.</p>	<p>Children who are placed in the refuge receive services such as play sessions and families are supported with getting children into school and getting back to normality. These services may not be available in a refuge is not provided.</p> <p>**Some emergency accommodation may not be appropriate for children and may be short term.</p>	<p>Highest proportion of clients in 2012/13 were aged between 30-39.</p> <p>At any one time the refuge can provide accommodation for 7 women and up to 21 children/babies. In 2012/13, 44 children were accommodated at the refuge with their families.</p> <p>Emergency accommodation for women with children fleeing domestic abuse will continue to be provided through the proposed model.</p> <p>Outreach service / floating support service will continue to be provided to clients placed in alternative housing options.</p>
	People with caring Responsibilities	<p>In May 2013, 59% of child protection cases involve domestic abuse and this includes families placed in the refuge from out of the area. **Some of these families could have been better supported to reconnect to areas where support networks are available.</p>	<p>Under this proposal there will be no provision of the 'traditional' all inclusive refuge accommodation and support service for women with caring responsibilities fleeing domestic abuse. **This may mean women choose not to flee domestic abuse and stay with their partners.</p>	<p>Emergency accommodation for women with children fleeing domestic abuse will continue to be provided through the proposed model.</p> <p>Outreach service / floating support service will continue to be provided to people with caring responsibilities.</p>

Details	
No	Question
	<p>Male and Female victims of domestic abuse placed in emergency accommodation will be fast-tracked to the domestic abuse outreach service.</p> <p>** Women who have older male children with them when they flee domestic abuse are not currently able to access refuge provision. Under these proposals, these women will be matched appropriately to accommodation according to their needs.</p>
	<p>Housing Options will commission a framework of emergency accommodation and the specification will include a requirement for a proportion of accessible units.</p> <p>**There is a concern that shared accommodation, such as a refuge, can have a negative impact on women with complex needs including mental health needs. Under these proposals these women will be matched appropriately according to their needs.</p>
	<p>**There is a potential for an increased risk to safety of service users by any delay in placement due to waiting time for housing appointment.</p> <p>**There is potential for an increased risk to safety of service users due to there being no 'traditional' confidential accommodation unit.</p> <p>**Under the proposals women with caring responsibilities may not have peer support networks available to them which could lead to feelings isolation and an increased risk they will return to their partners.</p> <p>**There are concerns that under the proposals there will be a lack of specialist support available.</p>
	<p>None identified at this stage</p>
	<p>In 2012/13, 3 out of the 28 clients using the refuge said they had a disability.</p>

No	Question	Details	
<p>Women or men</p>	<p>Both female and male victims of domestic abuse placed in emergency accommodation will be fast-tracked to the domestic abuse outreach service.</p> <p>Housing Options have experience of currently placing women and children fleeing domestic abuse due to no availability at the refuge</p> <p>Housing Options will support victims to re-connect to areas where they have support networks (where it is safe to do so) to support sustainable independence.</p> <p>The needs of men fleeing domestic abuse will continue to be met through emergency accommodation. Currently men fleeing domestic abuse are not able to enter refuge accommodation. Therefore the proposal would see an equitable provision of services for men and women, which does not currently occur.</p>	<p>Under this proposal there will be no provision of the 'traditional' all inclusive refuge accommodation and support service for women fleeing domestic abuse. This may mean women choose not to flee domestic abuse but stay with their partners.</p> <p>**There is the potential for an increased risk to safety of service users by any delay in placement due to waiting time for housing appointment.</p> <p>**There is the potential for an increased risk to safety of service users due to there being no 'traditional' confidential accommodation unit.</p> <p>**Under the proposals women may not have peer support networks available to them which could lead to feelings of isolation and an increased risk they will return to their partners.</p> <p>**There are concerns that under the proposals there will be a lack of specialist support available.</p> <p>** There is a need for women to be able to move out of area and if priority is given to local people then some women from outside Torbay may be put at greater risk.</p> <p>**There was a concern raised as part of the consultation that there is a risk that the proposed model would not provide</p>	<p>Emergency accommodation for women fleeing domestic abuse will continue to be provided through the proposed model.</p>
<p>People who are black or from a minority ethnic background (BME) (Please note Gypsies /</p>	<p>Under these proposals, women will be matched appropriately to accommodation according to their</p>		<p>The provision of a service is not affected by ethnicity.</p>

Details			
No	Question	Details	Details
	<i>Roma are within this community)</i>	needs.	adequate anonymity for women who are at risk from honour-based violence and forced marriages. In 2012/13, 25 out of 28 clients placed in described themselves as White. The remaining 3 clients described their ethnic origin as Mixed: White and Black Caribbean and White Other.
	Religion or belief (including lack of belief)	Under these proposals, women will be matched appropriately to accommodation according to their needs.	The provision of a service is not affected by religion or belief. In 2012/13 the breakdown of clients with regards to religion and belief were: Not Known: 8 None: 10 Christian: 7 Any Other Religion: 3
	People who are lesbian, gay or bisexual	None identified at this stage	The provision of a service is not affected by sexual orientation. The breakdown of clients placed in the refuge in 2012/13 was 100% heterosexual.
	People who are transgendered	None identified at this stage	The provision of a service is not affected by gender/transgender.
	People who are in a marriage or civil partnership	None identified at this stage	The provision of a service is not affected by marriage/civil partnership. The breakdown of clients placed in 2012/13 with regards to this group is unknown
	Women who are pregnant / on	None identified at this stage	The provision of a service is not

Question		Details	
No	maternity leave		affected by women who are pregnant/on maternity leave. The breakdown of clients placed in 2012/13 with regards to this group is unknown
	Socio-economic impacts (Including impact on child poverty issues and deprivation)	None identified at this stage	**There is the potential that women who are not able to access a refuge may become homeless.
	Public Health impacts (How will your proposal impact on the general health of the population of Torbay)	None identified at this stage	None identified at this stage
8.	Cumulative Impacts – Council wide (proposed changes elsewhere which might worsen the impacts identified above)	Potential impact on the housing options services, who may see an increased demand for emergency accommodation and be required to undertake CAADA DASH risk assessments.	
8b	Cumulative Impacts – Other public services (proposed changes elsewhere which might worsen the impacts identified above)	**Potential impact on other domestic abuse services such as IDVAs, which may see increased demand for the services if women are not accessing services through the refuge. **Potential impact on other public services such as the police and health services if women are not able to access the refuge and the services provided through the refuge.	

Section 3: Mitigating action **TO BE UPDATED ONCE CONSULTATION UNDERTAKEN**

No	Action	Details
9.	Summarise any negative impacts and how these will be managed?	<ul style="list-style-type: none"> There is the potential for an increased risk to safety whilst women wait for a housing appointment. There will be no all inclusive refuge accommodation and support service for women fleeing domestic abuse. There is the potential for increased risks as there will be no confidential accommodation unit. A lack of shared accommodation may lead to feelings of isolation among some women and there is a risk they may return to their partners. Children may not have access to the same support which is currently available at the refuge.

	<p>Mitigating actions</p> <p>The development of any specifications in relation to domestic abuse services must take into account the findings from the consultation and the considerations outlined in section 6 above to mitigate against any potential negative impacts. Other mitigating actions will include:</p> <ul style="list-style-type: none"> • Waiting times for clients fleeing domestic abuse will be monitored by the Housing Options Service. • All pre-placement work as per the s184 Duty and undertaking CAADA DASH Risk Assessment (Domestic Abuse risk assessment tool) will ensure Housing Services undertake all placements under a legislative framework. • Both male and female victims of domestic abuse placed in emergency accommodation will be fast-tracked to the domestic abuse outreach service • Proactive publicity will be undertaken of who to contact in Torbay if fleeing domestic abuse – signposting to most effective service. • Safer Communities will provide specialist CAADA DASH training to Housing Officers • Safer Communities will monitor risk assessments undertaken for quality. <p>Please note the above will be updated once the extended consultation period has closed.</p>
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Section 4: Monitoring TO BE UPDATED ONCE CONSULTATION UNDERTAKEN

No	Action	Details
1060	<p>Outline plans to monitor the actual impact of your proposals</p>	<p>The impacts of any decision made in relation to domestic abuse services will be monitored in the following ways:</p> <ul style="list-style-type: none"> • Monitoring number of referrals to Housing Options Service and outreach services. • Monitoring waiting times for clients. • Monitoring levels of recorded domestic abuse incidents reports to the police, including repeat incidents. • Continued contract monitoring with of domestic abuse services. <p>Please note the above will be updated once the extended consultation period has closed.</p>

Section 5: Recommended course of action **TO BE COMPLETED WHEN CONSULTATION COMPLETE AND EIA FINALISED**

No	Action	Outcome	Tick ✓	Reasons/justification for recommended action
11.	<p>State a recommended course of action Clearly identify an option and justify reasons for this decision. The following four outcomes are possible from an assessment (and more than one may apply to a single proposal). Please select from the 4 outcomes and justify the reasons for your decision</p>	<p>Outcome 1: No major change required - EIA has not identified any potential for adverse impact in relation to equalities and all opportunities to promote equality have been taken</p> <p>Outcome 2: Adjustments to remove barriers – Action to remove the barriers identified in relation to equalities have been taken or actions identified to better promote equality</p> <p>Outcome 3: Continue with proposal - Despite having identified some <u>potential</u> for adverse impact / missed opportunities in relation to equalities or to promote equality. Full justification required, especially in relation to equalities, in line with the duty to have 'due regard'.</p> <p>Outcome 4: Stop and rethink – EIA has identified actual or potential unlawful discrimination in relation to equalities or adverse impact has been identified</p>		