

# Equality Impact Analysis Template

## Section 1: Introduction

Name of proposal
For the purpose of this document, 'proposal' refers to a policy, function, strategy or project
VAWG and Women's Safety Strategy
Service area and Directorate responsible
Cross Council, including Community Safety, Children's Social Care, Adult Social Care, Public Realm, Public Health, Licensing and Leisure Services. The sponsor for this project is the Community Safety Director, supported by HASC SPI service.
Name of completing officer
Adam Price, Strategy and Policy Lead
Approved by (Corporate Director / Divisional Director/ Head of Service)
Divisional Director, Community Safety - Ann Corbett
Date of approval
29052024

**Where a proposal is being taken to a committee, please append the completed EIA(s) to the cover report.**

### Conclusion – To be completed at the end of the Equality Impact Analysis process

This summary will provide an update on the findings of the EIA and what the outcome is. *For example, based on the findings of the EIA, the proposal was rejected as the negative impact on a particular group was disproportionate and the appropriate actions cannot be undertaken to mitigate risk. Or, based on the EIA, the proposal was amended, and alternative steps taken.*

*The focus of this is to analyse the impacts of the proposal on residents, service users and the wider community that are likely to be affected by the proposal. If the proposed change also has an impact on staff, the committee covering report should provide an overview of the likely equality impact for staff, residents and service users and the range of mitigating measures proposed.*

Conclusion	Current decision rating (see Appendix A)
Proceed pending agreement of mitigating action	Amber 

**The Equality Act 2010 places a ‘General Duty’ on all public bodies to have ‘due regard’ to the need to:**

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between those with ‘protected characteristics’ and those without them
- Foster good relations between those with ‘protected characteristics’ and those without them

This Equality Impact Analysis provides evidence for meeting the Council’s commitment to equality and the responsibilities outlined above. For more information about the Council’s commitment to equality, please visit the Council’s [website](#).

## Section 2: General information about the proposal

Describe the proposal including the relevance of proposal to the general equality duties and protected characteristics under the Equality Act 2010

The Violence Against Women and Girls (VAWG) and Women’s Safety strategy 2024-2029 sets out our approach to tackling gender-based violence in the borough, from street harassment such as catcalling through to domestic abuse and the wide range of VAWG crimes that the council seeks to address in partnership through prevention, community education, support for victims and

survivors, and responding to perpetrators. It sets out the direction of the council's efforts in this area for the life of the strategy, highlights what's new about the environment in which we work and the approach we will be taking, and clarifies our understanding of the complex range of issues surrounding gender-based violence.

## Section 3: Evidence (consideration of data and information)

What evidence do we have which may help us think about the impacts or likely impacts on residents, service users and wider community?

The strategy is informed by a thorough needs assessment conducted by an analyst within the Public Health division. It includes detailed research and analysis of local data as well as qualitative research through surveys and focus groups. This consultation involved over 370 residents of Tower Hamlets and more than 120 professionals working in the borough in and around VAWG in 2023.

The 2021 census data also provides us with an estimate of the prevalence of some protected characteristics across Tower Hamlets.

Research and recommendations from the Tower Hamlets Gender Inclusive Design report from May 2024 has also been used to inform the strategy.

We have also referred to data from commissioned providers who support people with domestic abuse for the period 2023-24 which, as the largest commissioned VAWG service, can help us understand who uses our services.

This analysis was conducted with the help of residents representing a range of protected characteristics through the Cornerstone Project, supported by Tower Hamlets CVS, which aims to produce a best practice guide to equality impact assessment. This includes representatives from the Expanded Learning Opportunities Program, GALOP, Tower Hamlets Inter-faith forum, Praxis, and women's Groups such as Somali organisations and Women's Aid.

## Section 4: Assessing the impacts on different groups and service delivery

Groups	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
<b>Protected</b>				
Age (All age groups)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Young adults are among those most at risk of being victims of domestic abuse. According to our data for 2023-24, 85% of referrals to our commissioned domestic abuse service for domestic abuse were for people between the ages 16-45 years.</p> <p>Other forms of VAWG such as Female Genital Mutilation (FGM) and harassment disproportionately affect younger women and girls. Decisions taken about</p>

			<p>VAWG services within the scope of the strategy therefore have the potential to have a disproportionate impact on these groups.</p> <p>In addition to this, there are specific forms of abuse within VAWG that have a particular impact on older members of the population. For example, familial abuse involving elderly relatives or abuse of those with dementia.</p> <p>Broader issues of women's safety around access and use of public space affect different age groups differently – younger people surveyed as part of our gender inclusive design work were more likely to report that fear of victim blaming shaped their decisions about walking in the city.</p> <p>While specific projects will be accompanied by their</p>
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				<p>own equality impact analysis to consider the associated implications in more detail, it is intended that the work we undertake on this during the life of the strategy to provide appropriate services for specialist need and embedding gender-based design will improve the experiences of these groups in accessing support or in making use of public space in the borough.</p>
<p><b>Disability</b> (Physical, learning difficulties, mental health and medical conditions)</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Evidence shows that disabled women and girls have an increased risk of violence and abuse compared those who are not disabled and typically experience abuse for a longer time before accessing support (SafeLives, 2017).</p> <p>The percentage of disabled people reporting sexual offences is lower than we</p>

			<p>would expect – around 20% of residents report having a disability compared to 5.6% of those who reported sexual offences to police in Tower Hamlets between 2021-23.</p> <p>This lower than expected rate of reporting suggests the potential for increased accessibility of awareness, educational and outreach work to have a significant positive impact on disabled residents, which this strategy aims to do. While ~25% of those accessing our IDVA service reported having a disability, this is a service where we might expect to see a greater number of those with additional intersectional vulnerabilities and it is difficult to draw informed conclusions on whether we have sufficiently addressed barriers to access for different types of disabilities. This is particularly true given the</p>
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			<p>extremely wide range of access needs faced by different people with various disabilities – being wheelchair accessible does not make a premises more accessible to the deaf community, for example.</p> <p>It is therefore anticipated that work within the strategy that considers specific barriers to access for different groups and training for professionals to help address this will also have a positive impact on disabled people affected by the VAWG and Women’s Safety Strategy.</p> <p>Some forms of disability such as autism or learning disabilities may also be relevant to improving our approach to working with perpetrators where these disabilities have an impact on forms of VAWG or misogynistic behaviours and where effective</p>
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				intervention to prevent recurrence of these behaviours requires a different approach as a result.
<b>Sex</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Violence against women and girls is recognised as a highly gendered form of violence that is to a large extent committed by men against women. Women are at greater risk of these forms of violence and men are overwhelmingly the perpetrators. All of our services in this area will therefore disproportionately have an impact on women.</p> <p>One in three of reported cases of domestic abuse in Tower Hamlets involve a male victim. However, those accessing our commissioned domestic abuse service in 2023-24 are almost entirely female (95%). This suggests a high level of unmet need in</p>

				the male population of the borough and the need to address access for male victims and survivors as part of work to improve access within this strategy.
<b>Gender reassignment</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Domestic abuse services in the borough see extremely few transgenders and non-binary individuals. Since this population group is known to be at significantly greater risk of gender-based violence, there are concerns that the low reporting and access to services in the borough reflects distrust in public institutions rather than low prevalence.</p> <p>Understanding the particular needs of this group has been highlighted within the strategy as an area requiring additional work to understand and address boroughs and</p>

				<p>increase access to services.</p> <p>Data quality regarding gender reassignment tends to be poor across services and research; improvements to the quality and consistency of data will support better insight on this area. However, there is known good practice to apply in services regarding inclusion and access among trans and non-binary people, regardless of data quality.</p>
<b>Marriage and civil partnership</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>For those in an abusive relationship, marriage or civil partnership can be a complicating factor, throwing up additional barriers to leaving that relationship. This could be due to questions around finances, the ownership of the home, entitlement to housing support, child custody, legal migration</p>

				<p>status and no recourse to public funds among other things.</p> <p>Additionally, in conjunction with religious considerations (also referenced below), attitudes and beliefs about a person's responsibility to stay and accept abusive behaviours may be influenced by what religious cultural practices say about the duties of married people in particular. We recognise the role that faith leaders have in challenging misogyny and abuse.</p> <p>As part of work included within this strategy we intend to do more work with cultural and faith groups and religious representatives to ensure that the messages residents receive do not negatively impact on their situation, as well as ensuring that the advice</p>
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				and support that victims and survivors receive enables them to navigate financial and legal complexities thrown up by marriage or civil partnership.
<b>Religion or philosophical belief</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>According to people who access domestic abuse service (2023-24) around 55% are Muslim and 14% identify as Christians. Tower Hamlets has one of the largest Muslim populations in England. Religion or belief and how they are interpreted within certain cultures can play a significant role with respect to attitudes in relation to women, trans or non-binary individuals at risk of gender-based violence and misogyny. Some communities across a wide range of religions may hold views about the role of women and the subordination of their lives to those of men.</p>

			<p>Additionally, cultural practices involving violence against women and girls may be mistakenly considered or labelled by residents or professionals as religious practice, for example in the case of Female Genital Mutilation (FGM) or other forms of honour-based violence. Our Sister Circle FGM programme preliminary report suggests that those who are engaging with service are approx. 85% Muslim and 15% Christian.</p> <p>As set out in the section on marriage above, religious and cultural mores against divorce or on the role of women can be complicating factors that lead to additional barriers for those experiencing abuse.</p> <p>Victims or survivors may face accessibility barriers in relation to religion,</p>
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			<p>whether in terms of availability in relation to religious observance, the desire for gender-segregated services, or other needs.</p> <p>As mentioned above, work with cultural and faith groups and religious representatives is intended to address some of these elements and champion the positive actions that religious institutions can take to address male violence.</p> <p>It is also worth noting that we have seen from nationally reported cases of the grooming of young Asian women by extremists that the work of Prevent and similar initiatives can have significant implications with respect to violence against women and girls. Getting the council's partnership working right in relation to this sensitive area also has</p>
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				the potential to affect the experiences of young women in this respect.
Race	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>As an extremely diverse borough with significant Somali and Bangladeshi populations, any decision that affects Tower Hamlets residents is likely to have a significant impact in relation to this protected characteristic. In relation to VAWG, this can be in relation to cultural barriers that affect access, the mistrust of VAWG, legal and criminal justice services among some ethnic communities. It may also arise to a degree in relation to how a focus on larger communities might obscure the needs of smaller population groups.</p> <p>Over half of all those accessing our commissioned domestic abuse service are from</p>



			<p>Asian ethnicities (2023-24, 54%), of which the Bangladeshi community made up approx. 48%. White British made up 19% of those using the service. In keeping with our Tower Hamlets Partnership Plan's call to action, to be a fair, inclusive and an anti-racist borough, this strategy highlights the importance of addressing individuals' needs relating to race or associated cultural factors and not taking a one-size-fits-all approach. This aims to build on work such as the Haawa Project during the last strategy that provided tailored support to predominantly (~80%) Somali women as well as a selection of other ethnicities. The commissioned support service provider will work with a third sector organisation specialising in working with Black and Asian minority ethnic groups.</p>
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			<p>The domestic abuse service recognises language barriers and provided translation support to 30% of clients. These additional barriers if not addressed can make communities less likely to access service and more vulnerable to violence and abuse.</p> <p>Any approach that is affected by migration status is also likely to have a disproportionate impact on race, due to the demographic make-up of migrants. Where those suffering abuse have No Recourse to Public Funds (NRPF), this can be a significant factor in the services they receive or individuals may even have their migration status used against them as a threat by perpetrators.</p> <p>The VAWG service recognises the importance</p>
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				of managing these particular complexities and work planned during the life of this strategy aims to improve our offer and the experience of victims and survivors with NRPF.
<b>Sexual orientation</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>93% of domestic abuse service users in 2023-24 are recorded as heterosexual, while 7% of recorded users are unknown or declined to answer.</p> <p>However, the 2021 census data which showed Tower Hamlets has a higher percentage of those who identify as lesbian, gay or bisexual than England and Wales as a whole – 7.2% compared with 3.1%. As with other elements of the LGBTQ+ community, we see underreporting and a distrust of institutions in relation to VAWG crimes such as domestic abuse. Combined with a higher</p>

				<p>level of risk and no way to know whether those who chose not to declare their sexual orientation are from these groups, this presents as an area of significant unmet need.</p> <p>This strategy sets out to improve our understanding of the particular cultural needs faced by particular groups in relation to sexual orientation, such as those who are gay, lesbian and bisexual, the barriers they face, their service needs and the best way to engage with these communities.</p>
<p><b>Pregnancy and maternity</b></p>	<p><input checked="" type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p>It is recognised that abuse and coercion often starts or becomes worse when pregnancy becomes known. It can increase vulnerability to certain kinds of VAWG and maternity has a number of implications for access to services in terms of the</p>

			<p>ability to travel far with a baby as well as factors such as potential health complications. Similar to marriage, it can be associated with additional concerns around financial dependence that can be a barrier.</p> <p>Tower Hamlets does not commission specific services for women who are pregnant or recent mothers as part of our work on VAWG, but it is anticipated that their needs will be included within the work to identify barriers to access and ensure that specific access needs, including those in relation to intersectional vulnerabilities, are met. For example, Barts Health and GP Care Group train midwives to support women and identify FGM within midwifery Services.</p> <p>Our VAWG work will involve building stronger</p>
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				links with services that work with residents during pregnancy and maternity period such as antenatal services, infant feeding, or health visiting.
<b>Experience of Care</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The 2021 Domestic Abuse Act recognised abusive behaviour between 16-17 year olds as domestic abuse as well as recognising children who witness or experience domestic abuse as victims and survivors. Children under the age of 18 years old are considered victims of domestic abuse if they see, hear or experience the effects of domestic abuse and are related or under the care of either the victim or perpetrator of abuse. As those with experience of care are more likely to have experience of domestic abuse prior to being in care, and the power dynamics or lack of alternatives available to

				<p>those in case can be a barrier to addressing abuse, this has a particular impact on that population group.</p> <p>This expansion of the definition of domestic abuse is something that will be addressed during the strategy and the council intends to adjust its service offer for children in response to this change.</p>
<b>Other</b>				
<b>Socio-economic</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Socio-economic deprivation is strongly linked with homelessness, where we saw almost 10% of cases linked to domestic abuse between 2018-2023. Consideration of housing pathways within this strategy is intended to support those in this situation and improve joined-up working between VAWG services and services such as housing or our tackling poverty team.</p>

<p><b>Parents/Carers</b></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>VAWG training offer is available to parents and carers in Tower Hamlets. Many parents and carers have undergone VAWG champions training and are linked in with safeguarding processes including Multi Agency Support Teams (MAST) and Multi-Agency Risk Assessment Conference (MARAC).</p> <p>However, as discussed above under Pregnancy and Maternity, parents with small children may face additional barriers in relation to accessing services. Their needs will be included within the work to identify barriers to access and ensure that specific access needs, including those in relation to intersectional vulnerabilities, are met.</p>
<p>People with different <b>Gender Identities</b> e.g.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	



<p>Gender fluid, Non-Binary etc</p>				<p>We know that non-binary people, gender non-conforming people, and people with diverse sexualities can be targeted for forms of gender-based violence based on their sexuality, gender identity and/or gender expression.</p> <p>The exploration of barriers faced by LGBTQ+ communities as part of the strategy will require recognising the sometimes-particular needs that these individuals will have in relation to gender-based violence.</p>
<p><b>Any other groups</b></p>	<p><input checked="" type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p>Migrant survivors - Migrant victims and survivors of domestic abuse face some of the most significant barriers to accessing support simply because of their immigration status. 'Immigration abuse' is a tactic used by abusers as a form of coercive control.</p>

				<p>See the section on NRPF in relation to race, above.</p> <p>Intersectional groups - We recognise that whilst each protected characteristic has barriers, vulnerabilities can be compounded further for intersectional groups too i.e. someone who is not only Asian but also gay.</p>
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## Section 5: Impact analysis and action plan

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Update on progress
VAWG Steering Group to agree regular cycle of reporting on demographics of service use, that includes consideration any necessary response and incorporating these into their action plan/s, and to update their Terms of Reference accordingly.	Update ToR	By September 2024	Simon Smith	
Revision of data collection across partnership to capture information which would adequately inform equalities impact assessment and support service improvements and adaptations.	Review Data collection and establish key metrics for delivery of outcomes	Ongoing	Simon Smith	
VAWG services and commissioned providers to identify	Target interventions for specific under represented	By January 2025	Simon Smith	

<p>underrepresented groups and agree/implement mitigating actions to respond.</p>	<p>groups in terms of service take up (somali community, older victims/ male victims/ LGBT victims).</p>			
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## Section 6: Monitoring

What monitoring processes have been put in place to check the delivery of the above action plan and impact on equality groups?

Work is planned with the VAWG Steering Group to develop their action plan and the requirements above will be included within it.

## Appendix A

### EIA decision rating

Decision	Action	Risk
<p>As a result of performing the EIA, it is evident that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a Protected Characteristic under the Equality Act and appropriate mitigations cannot be put in place to mitigate against negative impact. It is recommended that this proposal be suspended until further work is undertaken.</p>	<p><b>Suspend – Further Work Required</b></p>	<p><b>Red</b></p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, there is a genuine determining reason that could legitimise or justify the use of this policy.</p>	<p><b>Further (specialist) advice should be taken</b></p>	<p><b>Red Amber</b></p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negatively impact (as described above) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, this risk may be removed or reduced by implementing the actions detailed within the <i>Impact analysis and action plan</i> section of this document.</p>	<p><b>Proceed pending agreement of mitigating action</b></p>	<p><b>Amber</b></p> 