

Impact Assessment



Assessment of: Commissioning services to address Domestic Abuse in Devon

Service: Communities Team

Head of Service: Simon Kitchen, Head of Communities

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1. Description of project / service under review

Devon County Council has a statutory duty under the Domestic Abuse Act 2021 to assess the need and have a strategy for domestic abuse support for all victims (and their children) who reside in relevant safe accommodation and to deliver support for them. The 'Strategy for delivering domestic abuse support in safe accommodation - Domestic and Sexual Violence and Abuse' defines our objectives in reference to this.

In addition to this, the Safer Lives & Communities Team have a convening function for the Interpersonal and Gender-based Violence and Abuse (IG-BVA) Local Partnership Board. The IG-BVA Local Partnership Board, part of Safer Devon Partnership, has recently refreshed its Strategic Needs assessment, to improve our understanding of communities and individuals affected by domestic abuse, in Devon. Following this work, Devon County Council is now wishing to remodel and recommission the provision of domestic abuse support services for the county, with an anticipated implementation date for the new services of 1st of April 2025.

For the purposes of clarity within this report, we use the term of interpersonal and gender-based violence and abuse (IG-BVA) to describe three categories of harm: Violence Against Women and Girls, Domestic Abuse and Sexual Violence and Abuse. This report is focused on our primary activity on Domestic Abuse; however, it is worth noting that these three elements are intrinsically linked and from a victim/survivor viewpoint, cannot be naturally separated out.

2. Proposal, aims and objectives, and reason for change or review

The proposed new Service will form an integrated model that covers improved Access, prevention and early Intervention, risk planning and advocacy, work with those that harm, support in safe accommodation and recovery. The ambition is to provide a trauma informed person-centred delivery that leads to a positive sustainable change for those supported and their families.

See PIN - <https://www.find-tender.service.gov.uk/Notice/002280-2024?>

The commissioning of services is required because the current delivery is likely not to meet the community need in the future and we have a statutory duty under the DA Act 2021, in reference to support in safe accommodation, which we need to fulfil.

The current DSVA service has been funded through Public Health grants since 2018. The contract has been extended early in 2023, for an additional two years to end in March 2025 with extensions beyond this timeframe not fit for purpose. The current service receives 6000 referrals yearly, with dramatically increased demand (4000 pre-covid), in and post Covid. For many socio-economic reasons, the profile of victims is changing with higher risk cases forming the majority of referrals. Current arrangements do not effectively allow to respond to the increased level and complexity of demand. Moreover, we need to improve, at pace, the delivery of 'support in safe accommodation' in response to our statutory duties under the Domestic Abuse Act 2021. The solution is to merge the work within community support and that under the Domestic Abuse Act 2021 to form one integrated service.

Our learning since the current contract was awarded has shown us that, to achieve sustained impact, we need to look at a different delivery model which follows the life journey of victims much more, supports children more effectively, considers intersectionality, engages communities and support networks and addresses harmful behaviours, in order to reduce risk, prevent reoccurring victimisation and break the intergenerational cycle of abuse.

Through the SNA, contract management of the current community service model and through all the prototyping projects we have been rolling out over the last 2 years, we have identified some significant gaps in what is currently being delivered against the needs of those affected by DA within Devon.

3. Risk assessment, limitations and options explored (summary)

The following key risks are considered for this procurement processes that show a summary of key risk, impact an action areas.

We have explored a variety of options on how to design and develop the new service specification, with the most effective being the development of an integrated service. As part of this work an options appraisal has been undertaken and has identified no other viable solutions that carry the level of impact, least amount of risk and maximum service level as the current plan.

What are the risks if the proposal is not progressed? - The current community delivery model is no longer fit for purpose; therefore, it would continue to not meet need and deteriorate further. Only a small proportion of those in need will receive support in safe accommodation and the majority will receive nil support. No significant increase in the provision of safe accommodation can be elicited, therefore, reducing benefit of access to appropriate safe accommodation to end user Those that harm would not receive any interventions as the community contract is exhausted so cannot accommodate this Not all grants would be sustained in 2025/26 as no additional funds available, so there is a risk that some groups will not receive a service (CYP, those that harm, those from ethnic diverse groups etc)

What are the risks if we go ahead with the procurement? - The most notable risk if the procurement process goes ahead would be around possible challenge from current grant funded projects. Many of these have received DCC grant funding for domestic abuse services for several years. During the last 18 months work has been ongoing to ensure all providers have been made aware that funding will end in March 2025 and efforts have been made to engage the providers to seek alternative funding sources and ways of working that would mitigate the impact of any funding cuts. It should be noted that this risk is also present should the procurement process not go ahead as any grant funding arrangements beyond March 2025 could be reduced.

How will impacts and actions be monitored? - A risk register has been created for this procurement process and is subject to regular scrutiny and test of concept, this promotes a live view of the ITT development phase and allows for risk monitoring and option considerations as and when required.

4. People affected, diversity profile and analysis of needs

Domestic abuse is endemic, and its effects can be felt across Devon families and communities. Domestic abuse in all forms is often a hidden crime, not reported to the police. The Crime Survey for England and Wales (CSEW) includes a long-standing survey on the experience of domestic abuse, which gives insight into experiences that are never otherwise reported. This data consistently shows that a much higher proportion of the population have experienced abuse in the past year than that reported to the police or presenting to specialist services.

Domestic abuse is a gendered crime. Most people experiencing abuse are women: in Devon, 84% of referrals to the domestic abuse support service are for women. Nationally, 74% of victims of domestic abuse-related crimes are women. This is true whether abuse is by a partner or another family member. Based on the CSEW, it is reasonable to estimate that at least: *note data excludes Violence Against Women and Girls (VAWG) and sexual violence profiles*

- 7 in 100 women in Devon (25,000) experienced abuse in the previous year and 3 in 100 men (10,000). 30 in 100 women (107,000) and 14 in 100 men (46,000) have

- experienced domestic abuse at some time since age 16.
- This is a total of up to 35,000 currently victimised in Devon yearly. Most perpetrators of abuse are men: a man was the perpetrator in 91% of VAWG crimes in private spaces in Devon.
 - Abusive behaviour can be intergenerational and its impact long-lasting. In Devon between 85% and 100% of (male) adults participating in programs to change harmful behaviours have themselves experienced domestic abuse as children.
 - According to the CSEW, most domestic abuse experienced is non-physical: emotional/psychological and financial. The CSEW probably under-records abuse by coercive control and the survey is being revised to address this. But domestic abuse crime data in Devon shows a high proportion of crimes with violence. One in five of all crimes recorded in Devon is linked to domestic abuse (over 22,000 crimes annually). This includes 17,000 involving violence which reinforces the conclusion that most abuse is never reported.
 - In a survey of Devon residents on their experiences of domestic abuse carried out by the Safer Lives and Communities team in July and August 2023 - 204 of 258 respondents answered yes to having experienced abuse, 88% of which identified 'emotional/psychological abuse' and 76% of which listed 'controlling or coercive behaviour'. 34% of respondents who had experienced domestic abuse listed 'physical abuse' only and the majority indicated experiencing 2 or more different types of abuse.
 - Based on national police data, Devon and Cornwall Police is not an outlier compared to similar police force areas for most domestic abuse crime (prevalence of crimes/incidents, criminal justice processes). While domestic abuse-related crimes were 21% of all recorded crimes in Devon in 2021-22, domestic abuse-related prosecutions were only 12% of all prosecutions. The percentage of domestic-abuse-related prosecutions that lead to convictions however is higher in Devon and Cornwall than in comparators (84% in 2021-22).
 - The number of people referred to Devon's domestic abuse support service delivered by FearFree has been rising steadily, with a significant jump during and following the Covid-19 lockdowns. In the year to March 2023 5,930 individual referrals were made to the service. This was a 12% increase on the previous year. Generally, around two thirds of people referred engage with support to some degree. This equates to around 11% of the Devon population affected by domestic abuse, based on the prevalence estimate from the CSEW.
 - In Devon and Cornwall in 2021-22, 407 "Right to Ask" requests under the Domestic Violence Disclosure Scheme "Clare's Law"ⁱ were received and 126 disclosures made. In 20/21 203 requests were made and 114 granted. In 19/20 323 requests resulted in 111 disclosures. The overall number of requests has increased but disclosures have remained at similar levels. In both years, there were also a smaller number of "Right to know" disclosures (where police make a disclosure on their own initiative). We have not compared the levels of applications and disclosures in Devon and Cornwall with other similar police areas.
 - Those that harm or display harmful behaviours are often overlooked across the system with emphasis placed on victims to reduce or remove risk, often resulting in systematic victim blaming. Only 5% of respondents to the Devon residents' survey felt that enough support was provided to those that harm to address their behaviours.

5. Stakeholders, their interest and potential impacts

Stakeholder engagement has been at the centre of the development work over the last two years. A number of forums and mechanisms are available to bring the system together around Interpersonal and Gender-Based Violence and abuse and allow for collaboration, integration and system stabilisation with this proposal.

Within Devon, we have an Interpersonal and Gender-based Violence and Abuse (IG-BVA) Local Partnership Board that meets bi-monthly and includes representation from: Cabinet Portfolio Holder, Children Social Care – Safeguarding/ Children’s services, Devon Safeguarding Children Partnership, Safer Lives and Communities, Public Health Nursing, Education, Public Health, Devon and Cornwall Police, HM Prison & Probation Service, NHS Devon Integrated Care Board, District Councils, Devon & Cornwall Housing Options Partnership, a number of Charities and voluntary organisations working with victims of interpersonal and gender-based violence, Devon Partnership Trust, Together Drug and Alcohol services, Office of the Police and Crime Commissioner and Victim Support. This has created opportunities for collaboration, connections and created successful partnerships.

The above also provides governance for the MARAC Steering Group, which oversees activity in Devon. This also provides a forum for system connecting and collaboration with all above organisations that has allowed for data gathering and collaboration across statutory services and respective partners.

The IG-BVA Local Partnership Board also provides governance for subgroups such as Staying Put, which focuses on keeping people exposed to domestic abuse safe within their own homes and the newly formed Criminal Justice Working Group, which considers support opportunities and reform within the civil and criminal justice system where domestic abuse is the focus.

At peninsula level, the EOS Board allows us to collaborate with the 3 other Local Authorities, the OPCC, Victim Support and the ICBs.

Locally within Devon people with lived experience of domestic abuse have been at the forefront of decision making in reference to developing details around the procurement of this service. There is indirect representation of the target group on the Domestic abuse Partnership Board with stakeholders providing direct delivery. We are also engaging people with lived experience directly through ‘Your voices count’ activities to allow some co-production of the specification and ensure this responds to their needs.

Impacts

The most significant impact of this work focuses around not going ahead with the planned procurement for the new service. This would lead to considerable uncertainty within the current providers due to the unpredictability of grant funding, which would create a system wide reduction in support and disengagement within the current networks. With a weakened infrastructure, DCC would not be able to respond effectively in supporting those affected by domestic abuse and could then, in turn, fail in

meeting its statutory duty. Such a position could then see the wider domestic abuse support community and key stakeholders such as Devon and Cornwall Police and Public Health having to fill any service gap, which will add additional cost burden onto an already stretched system.

However, it is recognised that should the procurement process be permitted then the impacts are more focused around the need for clarity in communication and provision of support for the current grant funded services. One or more local domestic abuse providers who are currently receiving DCC grants for domestic abuse services may become at risk of financial hardship due to the loss of a regular grant. Such a move could see the reduction in provider size or loss of provider all together with the subsequent loss of jobs and dedicated skills base. Close work with current grant funded services to ensure that a forward plan is under development that will ensure alternative sources of income can be determined, or an organisational restructuring can be achieved that will provide some protection to the provider.

Whilst there also remains a risk of challenge over any decision to reduce or cut any DCC grant, there has been significant work with the current providers to advise and support them around any changes and loss of funding.

In order to manage impacts, current partners have been kept up to date through the IG-BVA Local Partnership Board and where relevant, key statutory partners not involved in the bidding processes will be invited to be included within the tender evaluation. This will include agencies such as OPCC, Devon and Cornwall Police, Safer Devon Partnership, Devon Adult Social Services, Devon Mash, Public Health, District LA's, Housing Partners, NHS Devon ICB have been included in the specification drafting and will be included in the tender evaluation. The latter have been involved in consultations around service design for the new specification.

6. Additional relevant research used to inform this assessment

Devon County Council reviews the current services internally using contract meetings, service performance quarterly reporting, outcome data and thematic discussions with the current providers. These activities enabled us to better understand how the services have been performing in meeting the needs of Devon residents, meeting the targets set and developing the offer further. The findings from these discussions will be used to inform the new service specification and future thinking and have been a fundamental element in the strategic thinking behind this work.

7. Description of consultation process and outcomes

The modelling and development of the new service started almost two years ago and leads on from the launch of the [Safe Accommodation Strategy](#) and more recently the **Local Partnership Strategic Needs Assessment 2023** ([Interpersonal & Gender-based Violence & Abuse - Safer Devon](#)).

The modelling work has included significant consultation and evaluation work of the current provision and needs within Devon, the findings of which have led to the

development of the service design for potential services post April 2025. The consultation process has included:

- Countywide IG-BVA Needs assessment that accounts for population and subject data around domestic abuse within Devon which has been used to establish a baseline within the county.
- Countywide public survey engagement looking at what works, what does not, where are the gaps and what aspirations are there for future services.
- DCC departmental and directorate lead survey and consultation on what works, what does not, where are the gaps and what aspirations are there for future services.
- Key stakeholder survey and consultation reviewing what works, what does not, where are the gaps and what aspirations are there for future services.
- VCSE sector survey and consultation reviewing what works, what does not, where are the gaps and what aspirations are there for future services.
- The development of prototype projects and initiatives over the last two years that have tested concepts around improved services delivery and efficacy.
- The appointment of a learning partner to evaluate and develop key learning from the prototype projects.
- Significant networking, partnership approaches and collaborations looking at what the current provision is achieving and developing new service delivery models for the future, which meet the needs within Devon in a cost effective and sustainable way.
- Engaging at length through people with lived experience who have supported the development of the service specification and have advised on where the strengths, weaknesses and gaps are within the services and within future planes, enhancing the delivery specification.

The result of this work has led to the development of the services specification, which is a culmination of two years developmental and research work.

Background information

8. Equality analysis

Under the Equality Act 2010, the local authority must consider how people will be affected by a service, policy or practice. In so doing we must give due regard to the need to: eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity and foster good relations across protected characteristics of age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership (for work), sex, sexual orientation, race, and religion and belief. The Equality Act 2010 and other relevant legislation does not prevent the Council from taking difficult decisions which result in service reductions or closures for example, it does however require the Council to ensure that such decisions are: informed and properly considered with a rigorous, conscious approach and open mind, taking due regard of the effects on the protected characteristics and the general duty to eliminate discrimination, advance equality and foster good relations; proportionate (negative impacts are proportionate to the aims of the policy decision); fair, necessary, reasonable, and those affected have been adequately consulted.

Characteristics	Potential or actual issues for this group. [Please refer to the Diversity Guide and See RED]	How will the project / service / policy / activity: <ul style="list-style-type: none"> • eliminate or reduce the potential for direct or indirect discrimination, harassment or disadvantage, where necessary. • advance equality (meet needs / ensure access, encourage participation, make adjustments for disabled people, ‘close gaps’). • foster good relations between groups (tackled prejudice and promoted understanding), if relevant? <p>In what way do you consider any negative consequences to be reasonable and proportionate in order to achieve a legitimate aim?</p> <p>Are you complying with the DCC Equality Policy?</p>
All residents (include generic equality provisions)	<p>The service will align to the Equality Act and DCC’s Equality and Diversity Policies</p> <p>The specification for the service requires the service to give particular due consideration to parity of access to all and address barriers to access</p>	<p>The service will be delivered across Devon in person, through the phone and virtually and is required to apply flexibility to respond to individuals’ needs and to change over time in response to the changing needs of the system.</p> <p>Accessibility and choice have also been considered with Service required to operate outside of standard working hours and applying flexible solutions around digital access, transport and childcare/ employment issues, People are offered choice in how they access services, what support they would like, and where they would like to access it</p>
Age	As above	<p>The service is open to all victims (and their children) in line with the Domestic Abuse definition under the DA Act 2021 of victims being recognised as victims when 16 or over. The service will also consider specific age-related challenges as identified in the 2023 IG-BVA SNA</p>

Characteristics	Potential or actual issues for this group. [Please refer to the Diversity Guide and See RED]	How will the project / service / policy / activity: <ul style="list-style-type: none"> • eliminate or reduce the potential for direct or indirect discrimination, harassment or disadvantage, where necessary. • advance equality (meet needs / ensure access, encourage participation, make adjustments for disabled people, ‘close gaps’). • foster good relations between groups (tackled prejudice and promoted understanding), if relevant? <p>In what way do you consider any negative consequences to be reasonable and proportionate in order to achieve a legitimate aim?</p> <p>Are you complying with the DCC Equality Policy?</p>
Disability (incl. sensory, mobility, mental health, learning disability, neurodiversity, long term ill health) and carers of disabled people	As above	<p>Service will be delivered digitally, via telephone and in person. When in person the service will be required to be responsive to people’s individual needs as described above. There are no exclusions to access the service based on someone’s disability, including on the grounds of mental illness.</p> <p>The service is required to address barriers to accessing services which may include inability to pay for transport, childcare responsibilities, language, specific vulnerabilities and issues with reading/writing/digital literacy and are required to be flexible in their approaches to seek solutions to any other individual need that stops access.</p>
Culture and ethnicity: nationality/national origin, ethnic origin/race, skin colour, religion and belief	As above	<p>Service is required to be proactively addressing barriers to access such as language and cultural barriers and is required to be sensitive to intersectionality and tailored to be accessible to marginalised groups such as ethnically diverse groups, Lesbian, gay, bisexual and transgender (LGBT), older people and gypsy and travellers and will work with local specialist organisations in order to ensure this.</p> <p>And address barriers to accessing services which may include inability to pay for transport, childcare responsibilities, language, specific vulnerabilities and issues with reading/writing/digital literacy and are flexible in their approaches to seek solutions to any other individual need that stops access.</p>

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Sex, gender and gender identity (including men, women, non-binary and transgender people), and pregnancy and maternity (including women’s right to breastfeed)	As above	The service will be open to anyone that has experienced Domestic Abuse to a level that required safe accommodation regardless of sex, gender identity or pregnancy/ maternity status and is required to be sensitive to intersectionality and tailored to be accessible to marginalised groups such as Black and minority ethnic (BAME), Lesbian, gay, bisexual and transgender (LGBT), older people and gypsy and travellers and will work with local specialist organisations in order to ensure this
Sexual orientation and marriage/civil partnership	As above	The service will be open to anyone that has experienced Domestic Abuse to a level that required safe accommodation regardless of sexual orientation or relationship status and is required to be sensitive to intersectionality and tailored to be accessible to marginalised groups such as ethnically diverse groups, Lesbian, gay, bisexual and transgender (LGBT), older people and gypsy and travellers and will work with local specialist organisations in order to ensure this

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Other relevant socio-economic factors such as family size/single people/lone parents, income/deprivation, housing, education and skills, literacy, sub-cultures, 'digital exclusion', access to transport options, rural/urban	As above.	<p>The service will be open to anyone that has experienced Domestic Abuse to a level that required safe accommodation and is required to be sensitive to intersectionality and tailored to be accessible to marginalised groups such as ethnically diverse groups, Lesbian, gay, bisexual and transgender (LGBT), older people and gypsy and travellers and will work with local specialist organisations in order to ensure this.</p> <p>And address barriers to accessing services which may include inability to pay for transport, childcare responsibilities, language, specific vulnerabilities and issues with reading/writing/digital literacy and are flexible in their approaches to seek solutions to any other individual need that stops access.</p>

9. Human rights considerations:

We need to ensure that human rights are protected. In particular, that people have:

- A reasonable level of choice in where and how they live their life and interact with others (this is an aspect of the human right to 'private and family life').
- An appropriate level of care which results in dignity and respect (the protection to a private and family life, protection from torture and the freedom of thought, belief and religion within the Human Rights Act and elimination of discrimination and the promotion of good relations under the Equality Act 2010).

- A right to life (ensuring that nothing we do results in unlawful or unnecessary/avoidable death).

The service is required to comply with the Human Rights Act 1998 and have policies in place to support this.

10. Environmental analysis

An impact assessment should give due regard to the following activities in order to ensure we meet a range of environmental legal duties. The policy or practice does not require the identification of environmental impacts using this Impact Assessment process because it is subject to (please mark X in the relevant box below and proceed to the 11, otherwise complete the environmental analysis information below):

Devon County Council's Environmental Review Process	N/A
Planning Permission	N/A
Environmental Impact Assessment	N/A
Strategic Environmental Assessment	N/A

	Describe any actual or potential negative consequences. (Consider how to mitigate against these).	Describe any actual or potential neutral or positive outcomes. (Consider how to improve as far as possible).
Reduce, reuse, recycle and compost:	The service will consolidate a number of provisions which could reduce negative impact	Service can follow a green scheme. The service is not required to have fixed premises and is encouraged to co-locate or share spaces with other providers. This will increase the opportunities to reduce use of office furniture and equipment and encourage reuse and recycle
Conserve and enhance wildlife:	N/A	
Safeguard the distinctive characteristics, features and special qualities of Devon's landscape:	N/A	
Conserve and enhance Devon's cultural and historic heritage:	N/A	
Minimise greenhouse gas emissions:	Increased staff travel around the county	Online and group delivery reduces the need to travel. An integrated service will result in a larger number of staff that could be locality based, therefore, reducing need for travel across the county
Minimise pollution (including air, land, water, light and noise):	As above	As above
Contribute to reducing water consumption:		
Ensure resilience to the future effects of climate change (warmer, wetter winters; drier, hotter summers; more intense storms; and rising sea level):	Increased staff travel around the county	Online, phone and group delivery Co-location and shared spaces reduce the need for use of additional premises

11. Economic analysis

	Describe any actual or potential negative consequences. (Consider how to mitigate against these).	Describe any actual or potential neutral or positive outcomes. (Consider how to improve as far as possible).
Impact on knowledge and skills:	Nil	The service will support the wider system with expert knowledge around trauma and domestic abuse, therefore, improving the response. The service will have a workforce development plan and within this all staff will have personal development plans.
Impact on employment levels:	The service will require trained and qualified professionals to deliver the interventions. These are in high demand locally, regionally and nationally. This may put a strain on other area of the system around recruitment	The service will provide additional employment opportunities to trained and qualified therapists, IDVA's and other professionals with a special interest in the area of Domestic abuse and VAWG
Impact on local business:	Nil	Nil