



Harshbir Sangha  
Email: [specificduties@geo.gsi.gov.uk](mailto:specificduties@geo.gsi.gov.uk)  
Specific Duties – Policy review  
Government Equalities Office  
Zone J9, 9<sup>th</sup> Floor  
Eland House  
Bressenden Place  
London SW1E 5DU

21<sup>st</sup> April 2011

**EQUALITY ACT 2010: The public sector Equality Duty: reducing bureaucracy  
Policy review paper**

Women's Aid has been established since 1974 and is the national charity working to end domestic and sexual violence through:

- Protection - by influencing policy change and key decision makers
- Prevention - through raising awareness and education
- Provision of the services needed to help abused women and children

Women's Aid coordinates and supports a network of over 340 local specialist domestic and sexual violence organisations, providing over 500 refuges, helplines, outreach services and advice centres, as well as national help services. Last year, these services supported over 330,000 adults and children by providing advocacy, shelter, and safety and over one million people used our online help services.

Women's Aid welcomes the opportunity to respond to this consultation.

Women's Aid welcomes the Equalities Act 2010 and the general and specific duties, We believe that this legislation is very helpful and strengthened the past equalities legislation. Women's Aid also welcomes the government commitment to address violence against women.

Violence against women is causal and contributory to women's inequality and victims come from all parts of society and so also experience other forms of discrimination. This can add to their experiences of violence and abuse and also add barriers to help seeking to survive forms of violence against women, whether it is domestic violence, rape, forced marriage/honour based violence, trafficking, prostitution, female genital mutilation or sexual harassment.



**Women's Aid is very concerned that** the proposed changes to the regulations will weaken the effectiveness of the Specific Duties and so undermine the aims of the legislation, leaving members of the public at risk of all forms of discrimination covered by the Act.

**Women's Aid is concerned that:**

the removal of requirements on public bodies to publish details of the:

- engagement they have undertaken when determining their policies;
  - engagement they have undertaken when determining their equality objectives;
  - equality analysis they have undertaken in reaching their policy decisions;
- and
- information they considered when undertaking such analysis.

is likely to result in public bodies reducing their efforts to address discrimination and inequalities, and in the current economic climate this will allow them to reduce staffing capacity required to carry out this vital work. This will then impact on service delivery and the most vulnerable and marginalised members of society will be further excluded. In relation to violence against women we fear an increase in domestic homicides and increased use of emergency statutory services, such as the police and health, as smaller specialist violence against women services are cut and public bodies are no longer required to show how they have engaged and met the needs of different client groups, and communities. It is also likely to compound the difficulties that small voluntary sector services already face in accessing and influencing strategic planning bodies in local areas.

**Women's Aid is also concerned that:**

1. The new draft regulations: amend the requirement from “Public authorities must prepare and publish objectives” to “Public authorities must prepare and publish one or more objectives” and remove the requirement to set out how progress will be measured.

The Equalities Act addresses many different forms of discrimination and inequalities and it is highly unlikely that one objective or even two would permit the actions required to address inequalities facing women let alone deliver the comprehensive approach required to address all forms of discrimination experienced by people in local communities in England.

Women's Aid believes that the measurement process is important because unless the process is accessible and open to people who experience different forms of discrimination it is not possible to determine whether the objectives are achieved. Women's Aid services in the national network provide individual and institutional advocacy for women across England and this experience informs us that many women who experience domestic violence are excluded or do not receive satisfactory statutory services provision. Although there have been improvements in recent years there is much unmet need and an average of 2 women are still killed every week by current or former partners and the specific duties provide a useful tool for securing appropriate safety and support from statutory services.



**Women's Aid recommends that:** the government re-considers these proposals and makes appropriate changes to the regulations to ensure that:

- Engagement with local people/communities/services is transparent and accessible to all
- Public bodies have objectives that cover all forms of discrimination
- There are clear mechanisms for measuring progress and achievement of the objectives and that this process is accessible to everyone – even the most vulnerable and/or socially excluded people and that public bodies demonstrate how they do this.

---

Deborah Mcilveen  
Policy and Services Manager  
[d.mcilveen@womensaid.org.uk](mailto:d.mcilveen@womensaid.org.uk)  
0207 549 0587