

## Charnwood Borough Council

### Equality Impact Assessment 'Knowing the needs of your customers and employees'

#### Background

An Equality Impact Assessment is an improvement tool. It will assist you in ensuring that you have thought about the needs and impacts of your service/policy/function in relation to the protected characteristics. It enables a systematic approach to identifying and recording gaps and actions.

#### Legislation- Equality Duty

As a local authority that provides services to the public, Charnwood Borough Council has a legal responsibility to ensure that we can demonstrate having paid due regard to the need to:

- ✓ Eliminate discrimination, harassment and victimisation
- ✓ Advance Equality of Opportunity
- ✓ Foster good relations

For the following protected characteristics:

1. Age
2. Disability
3. Gender reassignment
4. Marriage and civil partnership
5. Pregnancy and maternity
6. Race
7. Religion and belief
8. Sex (Gender)
9. Sexual orientation

What is prohibited?

1. Direct Discrimination
2. Indirect Discrimination
3. Harassment
4. Victimisation
5. Discrimination by association
6. Discrimination by perception
7. Pregnancy and maternity discrimination
8. Discrimination arising from disability
9. Failing to make reasonable adjustments

**Note: Complete the action plan as you go through the questions**

**Step 1 – Introductory Information**

Title of the policy	Private Sector Housing Grants Policy 2017
Name of lead officer and others undertaking this assessment	Rebecca Short
Date EIA started	July 2017
Date EIA completed	July 2017

**Step 2 – Overview of policy/function being assessed:**

<p>Outline: What is the purpose of this policy? (Specify aims and objectives)</p> <p>This Policy sets out our approach when considering private sector housing grant applications, including Disabled Facilities Grants, Home Repair Grants, Home Safety Grants, ECO Top Up Grants and Partnership Grants.</p> <p>The Policy aims to;</p> <ul style="list-style-type: none"> <li>• Increase the number of vulnerable people who are able to live independently at home.</li> <li>• Reduce the number of vulnerable households living in homes that pose an imminent risk to their health and safety.</li> <li>• Increase the number of empty homes that are brought into use, particularly accommodation that can be used to reduce homelessness.</li> </ul> <p>It is the Councils aim to ensure the approach taken is inclusive across the range of protected characteristics, as outlined in the Equality Act 2010.</p>
<p>What specific group/s is the policy designed to affect/impact and what is the intended change or outcome for them?</p> <p>The Policy is designed to assist the most vulnerable people living in the private sector. It is widely accepted that there are strong links between poor housing conditions and poor health and that poor housing disproportionately affects vulnerable people who do not have the necessary resources to keep their homes in good repair.</p> <p>Although homeowners have the primary responsibility for ensuring their homes are properly maintained, Home Repair Grants will be awarded on a discretionary basis to help vulnerable households where there is an imminent risk to the health or safety of the occupant(s).</p> <p>The Policy also aims to assist those who require adaptations or alterations to allow them to continue living at home, through the award of both Mandatory and Discretionary Disabled Facilities Grants and Home Safety Grants.</p> <p>In addition, and in conjunction with the Empty Homes Strategy, the Partnership Grant is aimed at encouraging the owners of empty homes to bring their properties back into use and increase the availability of housing for homeless families and those at risk of becoming homeless.</p>

The award of a Partnership Grant is designed to impact positively on communities and individuals who are affected by the presence of a long term empty home in their neighbourhood. Improvements in property condition and occupation of the property will enhance the appearance of the home and remove the risk of crime and ASB associated with vacant homes.

The Grants will also impact positively on the owners of long term empty homes, encouraging and enabling them to return the home back into use, generating rental income (or sale value) and minimising Council Tax (including 150% premium charged for homes empty for 2 years or more).

Finally, those in housing need will benefit from the Partnership Grants through the increased availability of housing.

Which groups have been consulted as part of the creation or review of the policy?

Whilst preparing the Policy, Stakeholders including the Community Safety Policy Officer, the Citizens Advice Bureau, the Hospital Discharge Senior Housing Enabler and Renewal Officers were consulted and their views and comments helped to shape the final document.

### **Step 3 – What we already know and where there are gaps**

List any existing information/data do you have/monitor about different diverse groups in relation to this policy? Such as in relation to age, disability, gender reassignment, marriage and civil partnership, pregnancy & maternity, race, religion or belief, sex, sexual orientation etc.

Data/information such as:

- Consultation
- Previous Equality Impact Assessments
- Demographic information
- Anecdotal and other evidence

Mandatory Disabled Facilities Grants are awarded in accordance with legislation (Housing Grants, Construction and Regeneration Act 1996 as amended by the Regulatory Reform (Housing Assistance)(England and Wales) Order 2002 and guidance issued by Government which determines, amongst other things, the type of work that can be funded, the maximum amount of grant and the test of financial resources that must be made.

The Housing Act 2004 contains the Housing Health and Safety Rating System (HHSRS), which is an approach to evaluating the potential risks to health and safety from any deficiencies identified within a dwelling. The hazards assessed, of which there are 29, include; excess cold, damp and mould growth, falls, fire and structural collapse. For some hazards, a 'vulnerable group' (a range of people for whom the risks arising from the hazard is greater than for any other age group in the population) is identified e.g. children, the elderly. The vulnerable groups have been taken into consideration in respect of the qualifying criteria for the Home Repair Grant.

Empty Homes Strategy Stakeholder Consultation Event (May 2017).

The Strategic Housing Market Assessment (SHMA) for Leicester and Leicestershire (2014) – used to inform the Housing Strategy on how Charnwood will increase the supply of suitable housing within the Borough.

What does this information / data tell you about diverse groups? If you do not hold or have access to any data/information on diverse groups, what do you need to begin collating / monitoring? (Please list)

The underlying principle of the HHSRS is that any residential premises should provide a safe and healthy environment for any potential occupier or visitor. The vulnerable groups (those over 60 and children) identified for certain hazards, for example excess cold and damp and mould verifies that the qualifying criteria for the Home Repair Grant correctly targets the most vulnerable groups.

The SHMA identifies an overall housing requirement for Charnwood of 20,202 new homes over the 25 years from 2011-2036, to meet current and future need. Affordable housing needs equates to 21.5% of all the new housing planned over the period. Data modelling identifies that 46% of the overall housing need is for 1 bedroom units and that 72% of the 1 bedroom need is for older people.

Future demand is likely to come from single person households and child free couples although the greatest immediate need is for 2 bedroom houses and 2 bedroom bungalows. This information has been fed into the enforcement matrix, used to prioritise empty homes considered for enforcement action and it is also considered when determining discretionary Partnership Grant applications. Partnership Grant approvals include a nomination rights agreement, which contain a condition that the rental level for the property is set at no more than the Housing Allowance rate, making the property affordable. In addition, the tenants are nominated by the Homelessness Prevention Team – prioritising those families who are most in need.

#### **Step 4 – Do we need to seek the views of others? If so, who?**

In light of the answers you have given in Step 2, do you need to consult with specific groups to identify needs / issues? If not please explain why.

Unfortunately, our existing Customer Satisfaction and Equalities Monitoring data, obtained from previous grant recipients, which contains equalities monitoring information, is not statistically significant.

Although Customer Satisfaction and Equalities Monitoring return rates for grants is the highest within the service at 44% in 2015/16 and 48% in 2016/17, to be reliable and 'statistically significant' the return rate would need to be in the region 78% based on the number of surveys issued each year.

Further equalities monitoring may be required, to determine any barriers to the grant application process. A review of customer feedback rates has been undertaken across the Strategic and Private Sector Housing Service to further consider this issue.

#### **Step 5 – Assessing the impact**

In light of any data/consultation/information and your own knowledge and awareness, please identify whether the policy has a positive or negative impact on the individuals or community groups (including

what barriers these individuals or groups may face) who identify with any 'protected characteristics' and provide an explanation for your decision (please refer to the general duties on the front page).

	<b>Comments</b>
<b>Age</b>	<p>Mandatory and Discretionary Disabled Facilities Grants are not age specific.</p> <p>Limited discretionary Home Repair Grant funding has been targeted at those identified as the most vulnerable groups, defined by age (children and those over the age of 60), to assist them in maintaining healthy homes in a safe condition.</p> <p>By returning accessible homes e.g. bungalows, into use through Partnership Grants, residents with age related mobility issues will benefit from a general increase in the availability of this type of accommodation.</p>
<b>Disability (Physical, visual, hearing, learning disabilities, mental health)</b>	<p>Mandatory and Discretionary Disabled Facilities Grants are specifically aimed at assisting disabled residents to remain living at home through the provision of adaptations and alterations deemed necessary and appropriate with the guidance of Adult and Child Social Care Services.</p> <p>Limited discretionary Home Repair Grant funding has been targeted at those living with a chronic or severe illness, frailty or disability, to assist them in maintaining healthy homes in a safe condition.</p> <p>By returning accessible homes e.g. bungalows, into use, residents with a physical disability leading to mobility issues will benefit from a general increase in the availability of this type of accommodation.</p>
<b>Gender Reassignment (Transgender)</b>	No Impact
<b>Race</b>	Potential barrier for any grant applicants that do not speak a sufficient level of English to understand the process and/ or what is being asked of them. Written and verbal communication may need to be translated or interpreted, as an equalities consideration, in order to mitigate any adverse impact.
<b>Religion or Belief (Includes no belief)</b>	Neutral impact. However it is acknowledged that some faiths/ religions require worship on particular days and therefore may not be able to attend meetings/ appointments due to this. Due consideration will be given to this and flexibility will be applied, if required, in order to mitigate any adverse impact.
<b>Sex</b>	No Impact

<b>(Gender)</b>	
<b>Sexual Orientation</b>	No Impact
<b>Other protected groups (Pregnancy &amp; maternity, marriage &amp; civil partnership)</b>	No Impact
<b>Other socially excluded groups (carers, low literacy, priority neighbourhoods, health inequalities, rural isolation, asylum seeker and refugee communities etc.)</b>	<p>Availability of assistance is focused on low income households (identified through the receipt of certain income related benefits and through means testing), the elderly, infirm and those with children.</p> <p>General increase in availability of affordable accommodation, including affordable housing for people experiencing financial hardship.</p>

<p>Where there are potential barriers, negative impacts identified and/ or barriers or impacts are unknown, please outline how you propose to minimise all negative impact or discrimination.</p> <p>Please note:</p> <ul style="list-style-type: none"> <li>a) If you have identified adverse impact or discrimination that is illegal, you are required to take action to remedy this immediately.</li> <li>b) Additionally, if you have identified adverse impact that is justifiable or legitimate, you will need to consider what actions can be taken to mitigate its effect on those groups of people.</li> </ul>
<p>Race: Make interpretation and translation available in different languages, as and when required, so all applicants are able to understand the process and what is being asked of them.</p> <p>Religion or Belief: As individuals of some faiths/ religions require worship on particular days they therefore may not be able to attend meetings/ appointments due to this. Due consideration will be given to this and flexibility will be applied, if required, in these circumstances.</p>
<p>Summarise your findings and give an overview as to whether the policy will meet Charnwood Borough Council's responsibilities in relation to equality and diversity (please refer to the general duties on the front page).</p>
<p>By removing any potential barriers that may occur with regards to race &amp; religion or belief, and therefore mitigating adverse impact, the Private Sector Housing Grants Policy fully meets Charnwood's responsibilities in relation to equality and diversity. More so, the Policy has the potential to create a greater positive impact across a range of community groups through improvements in housing standards and the suitability of homes via adaptations designed to meet the needs of the occupants and the general increase in availability of affordable accommodation, including affordable housing for people experiencing financial hardship.</p>

**Step 6- Monitoring, evaluation and review**

<p>Are there processes in place to review the findings of this Assessment and make appropriate changes? In particular, how will you monitor potential barriers and any positive/ negative impact?</p>
<p>The outcomes of this EIA will be monitored and reviewed alongside the Policy.</p>
<p>How will the recommendations of this assessment be built into wider planning and review processes?</p>

e.g. policy reviews, annual plans and use of performance management systems.

Recommendations will be built into service planning, as appropriate. Additionally, there will be the consideration of improvements to Customer Satisfaction and Equalities Monitoring to increase return rates and enable the isolation and monitoring of statistically significant equalities information.

### Step 7- Action Plan

**Please include any identified concerns/actions/issues in this action plan:**

The issues identified should inform your Service Plan and, if appropriate, your Consultation Plan

Reference Number	Action	Responsible Officer	Target Date
001	Consideration of improvements to Customer Satisfaction and Equalities Monitoring to increase return rates and enable the isolation and monitoring of statistically significant equalities information.	Strategic and Private Sector Housing Management Team	1 <sup>st</sup> August 2018
003	Provide written and verbal communication in an appropriate language, if and when required.	Strategic and Private Sector Housing Management Team.	1 <sup>st</sup> August 2017

### Step 8- Who needs to know about the outcomes of this assessment and how will they be informed?

	Who needs to know (Please tick)	How they will be informed (we have a legal duty to publish EIA's)
<b>Employees</b>	Yes	Private Sector Housing Manager – for dissemination to team – in particular the Housing Standards and Renewal Officers
<b>Service users</b>	Yes	Publication of the Policy online and referral to the Policy of all grant applicants
<b>Partners and stakeholders</b>	Yes	Links to the online Policy to be sent to CAB
<b>Others</b>		
<b>To ensure ease of access, what other communication needs/concerns are there?</b>		

**Step 9- Conclusion (to be completed and signed by the Service Head)**

<b>Please delete as appropriate</b>
<b>I agree / disagree with this assessment / action plan</b>
<b>If <i>disagree</i>, state action/s required, reasons and details of who is to carry them out with timescales:</b>
<b>Signed (Service Head):</b>
<b>Date:</b>

Please send completed & signed assessment to Suzanne Kinder for publishing.