

Equality Impact Assessment (EqIA) for Policies, Procedures and Services

Proposal name	Housing Renewal Assistance Policy		
Directorate	Children's Services		
Service	Housing Standards and Improvement		
Responsible Officer	David Lockwood and Olga Cenkute		
Proposal planning start	14/04/22	Proposal start date (due or actual date)	1 July 2022
1	What is the purpose of the proposal?	Yes / No	New / revision
	Policy	Yes	Revision
2	What is the business case for this proposal? Please provide the main purpose of the service, intended outcomes and reasons for change?		
	<p>The Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 gave local authorities a discretionary power to provide assistance for housing renewal in a number of ways through a Housing Renewal Assistance Policy. The Council is required to produce and publish a policy and this report describes and seeks approval for the new Housing Renewal Assistance Policy ('the Policy') for 2022 to 31 December 2025</p> <p>The current policy with an end date of 2018 has been changed over time in line with approved delegated powers. The changes that have taken place have been consolidated within the new proposed Policy for 2022 to 2025 that is due for consideration / approval by cabinet in June 2022.</p> <p>The intended outcome is to have a new up to date Policy which sets the parameters for all grant funding related to physical works to dwellings in the borough.</p> <p>The services that the Policy details are principally those delivered by the Housing Standards and Improvement Services.</p> <p>Specific reference to DFGs and related adaptations: Disabled Facilities Grants (DFG) is provided to people with a physical disability who need to pay for adaptations to their homes to enable them to continue living safely and independently. These are mandatory grants the Council is required to provide under the provisions of the Housing Grants Construction and Regeneration Act 1996 (HGCR 1996). The Council receives most of its funding for these grants from government but the level of funding is insufficient to meet the current demand. This has historically always been the case and local authorities have over the years directly provided funding to help meet the demand for grants.</p> <p>The Policy uses available capital resources to assist residents. No funding will be approved without the council first having the relevant funds available.</p> <p>The policy will have limited impact on council owned dwellings - The council owns a very limited number of dwellings. The housing standards and Improvement service will continue to seek to support and attract external funds to improve this portfolio.</p>		



3	Who is the proposal likely to affect?	
	People in Walsall	Detail
	All	Yes
	Specific group/s	Yes
	<p>A significant proportion of the funding and assistance described in the policy relates to support for disabled residents. This includes but is not limited to Disabled Facility Grants (DFGs) which are available for all ages of disabled people.</p> <p>Other funding schemes are directed at tackling fuel poverty which whilst impacting on major sections of the Walsall population has a predominant impact on those with low incomes. Assistance is also prioritised towards specific groups and individuals for example those whose health is specifically made worse by cold and damp homes and currently have a risk from such properties such as elderly, very young children and those with COPD as an example.</p>	
4	Please provide service data relating to this proposal on your customer's protected characteristics.	
	<p>For the majority of grants key is the need to improve the residents dwelling. This is the initial over-riding criteria for example where a home needs no improvement or adaptation funding will not be considered. Specific schemes will have specific target groups or resident beneficiaries for example:</p> <p>Disability - DFGs and related adaptations – 100% of these are provided for disabled residents and their wider household. Within these schemes specific additional support and assistance is provided for:</p> <ul style="list-style-type: none"> • Palliative applicants • Those with motor neurone disease • Those with visual impairment – referred by partners Walsall Society for the Blind • Those residents who are covered by the Councils Armed Forces <p>The DFG service is an important Council contribution to the range of preventative services which directly impact positively on the health and wellbeing of residents and potentially avoid more expensive health and social care interventions that can also be more disruptive for residents and their wider family and support network.</p> <p>Also see reference overleaf to impact of race on disability needs.</p> <p>Age</p> <p>The majority of assistance supports residents over pensionable age as they are particularly vulnerable to issues related to poor housing conditions including for example excess winter deaths. Another key category is support for families with very young children (those under age of 5). Page 4 of Chapter 6 of the published Joint Strategic Needs Assistance https://www.walsallintelligence.org.uk/jsna/ highlights for example the level of DFGs that are awarded to the very young and very old: for example 48 DFGs approved in 2021 for children and 342 for those 60 years of age or older.</p> <p>Other assistance within the Policy seeks to support the very young and or the older members of Walsall. The reasons for this is that they are particularly vulnerable to specific risks defined within the Housing Health and Safety Rating System (HHSRS). For example excess winter deaths impacts on older residents more than those of middle age.</p>	

Gender

There is no anticipated detrimental impact. There may be more of a positive impact for women especially for the assistance that relates to older residents for example but not limited to DFG as we know that a significant proportion of DFG applicants are older people and the life expectancy of women is generally greater than that of men nationally and also within Walsall. <https://www.walsallintelligence.org.uk/jsna/> (Chapter 4 Ageing well – data on mortality).

As children under 5 are noted as a vulnerable group likely to be positively affected by this Policy, and primary caregivers of children under 5 remain women, it may positively, though disproportionately, affect women, and specifically single mothers who may face increased need due to low income relative to their partnered counterparts, and may therefore live with excess cold or damp in their homes.

Race / ethnicity - link with disability

“Researchers found that those from a South Asian background, at every stage of adulthood, were more likely to experience poor physical functioning and had an increased risk of developing a physical disability than their White counterparts. This ethnic difference was most pronounced in women, with older South Asian women (over the age of 60) being four times more likely to report having a physical disability compared with older White British women of the same age. The increased risk among South Asians could not be attributed to socioeconomic status or existing major health conditions such as diabetes, which is particularly prevalent among UK South Asian people.

Researchers also found that African Caribbean women had elevated odds of poor physical functioning compared with White British women from middle age onwards, for example, in the older group, with 75% of African Caribbean women reporting poor physical functioning compared with 57% of White British women. The research indicated that socioeconomic status and chronic conditions, in particular obesity and hypertension, may help explain some but not all of the increased risks reported by African Caribbean females.” [Ethnic minority groups have higher risk of developing a physical disability than their White British counterparts | University of Surrey](#)

Thus the policy may positively, though disproportionately, affect those of minority ethnicity due to the prevalence of physical disability and mobility issues within minority ethnic communities at all stages of adult life, but particularly so in older populations, who may therefore require assistance and home adjustments.

Race – link with Poverty

Also, the Social Metrics Commission recently published data to show that while “data shows that the largest proportion of those in poverty (75%, equating to 10.7 million people) are in families with a head of household who is White...”, “... we find that the rate of poverty is much higher for Black and Minority Ethnic families. Nearly half (46%, equating to 900 000 people) of all people living in families where the household head is Black/African/Caribbean/Black British are in poverty, compared to just under one in five (19%) of those living in families where the head of household is White. People in Black and Minority Ethnic families are also between two and three times more likely to be in persistent poverty than people in White families” [Measuring-Poverty-2020-Web.pdf \(socialmetricscommission.org.uk\)](#)

As some schemes mentioned in the Policy are means tested and therefore more likely to affect those on lower incomes/living in poverty, it may positively, though disproportionately, affect those from minority ethnic backgrounds.

5 Please provide details of all engagement and consultation undertaken for this proposal. (Please use a separate box for each engagement/consultation).

The existing Policy has been online and available for residents and organisations to review and comment upon since 2014. Comments that have been made during the intervening years have helped shape the current proposal and have for example led to already agreed changes (approved under delegated powers):

Palliative Support – feedback from impacted households and specialist Palliative Occupational Therapists has been positive and supported the introduction and expansion of a streamlined grant process that has been highly successful in delivering prompt action when households need it most;

Those with visual impairment – A new service and system of adaptation help has been developed with the direct support of Walsall Society of the Blind. Further engagement with this organisation has been undertaken to market and promote other grant opportunities for residents.

Support for households covered by the Armed Forces Covenant – The council through its services already supported veterans and its families and helps organisations such as the charity SAFFA to retain their funding and ensure eligible residents access funds from other sources.

Other Policy changes

The Policy has been developed following detailed input from a range of stakeholders and partners including Occupational Therapists (OTs), the national charity for Housing Improvement Agencies (Foundations), West Midlands Fire Service and colleagues in a range of departments.

One new area of support has been specifically identified through examination of national best practice and involvement of senior OTs and that is for extra support for those residents with Motor Neurone Disease (MND) diagnosis.

Home Energy / Insulation and Micro-generation assistance

As indicated elsewhere there are significant funds available for households from a range of government and energy company sources. These change often and their availability is usually predicated on the specifics of an individual dwelling as a first key criteria i.e. does it lack a gas connection etc.

Many funding sources have very strict criteria for the specific works and also the household qualifying criteria. The majority of this is outside the direct control of the council and is often set by the funder themselves. The two key areas the council can influence is:

- Use of the health through warmth budget and
- Energy Company Obligation – Flex (ECO Flex)

With both of these the Policy is shaped on maximising external investment for households in the borough and seeking to prioritise dwellings in areas with the highest levels of recorded fuel poverty. The council regularly publishes an updated Home Energy Conservation Act Action Plan that is developed based on local and national statistics in line with government guidance. The council HECA action Plan is available at: https://go.walsall.gov.uk/heca_report_improving_home_energy_efficiency_together

The current plan is dated July 2021 and will be updated during 2022 when the government releases new data on fuel poverty at a local level. This will enable the council to ensure that it continues to focus assistance at those areas of the borough most in need.

Complaints and concerns relating to previous policy

The service since 2014 has also had a number of complaints / concerns raised by residents about parts of the Policy and especially related to DFGs. These have been addressed and responded to at the time through the official complaints procedure and where relevant the Local Government Ombudsman (LGO). The council continues to monitor LGO decisions to ensure that its own Policy reflects national best practice.

A key area of concern raised by applicants for DFGs is on the test of resources / means test. This is a nationally applied test and the council has no discretion in terms of the factors that contribute to this specific test. The council has however as indicated in the Policy agreed that certain types of cases will fall outside the scope of the Test of Resources and these include for example minor works (previously works up to £1,500 now up to £3,000), Palliative support and support for residents with MND.

The service has also responded to the currently frequently stated concerns of residents in terms of the impact of price inflation on contractors prices and the current Policy includes new discretionary Inflationary Top Up assistance. This is the first time the council has provided this form of help and it will help those with more expensive adaptations fund these until the statutory limit of £30,000 has been increased.

National Guidance

The Policy has been shaped based on current national guidance for example:

- [DFG national Guidance March 2022](#)
- [Eco 4-2022-2026 Guidance](#)

This guidance has itself been subject to extensive consultation and EQIAs.

Consultation Activity

As stated above.

6 Concise overview of all evidence, engagement and consultation

The Policy is directed at using strictly limited resources available to the council to target assistance at priority works and themes. For example, key is to ensure that the council's statutory duty to provide DFGs is met. This duty overrides all others – as the remaining assistance is provided on a discretionary basis to seek to improve housing conditions.

Other priorities are based on tackling other key issues of removing where possible risks to life from dangerous homes including but not limited to tackling excess cold and fuel poverty. The 29 risks that are tackled are those listed within the Housing Health and Safety Rating System (HHSRS). This specifically identifies risks that can occur within a dwelling and for each risk it also identifies if there are specific groups at harm from that risk. These harm groups are usually age related.

Many of the funds described in the Policy are to tackle specific issues and must be used for clearly defined purposes. These funds are often from national government sources or from energy companies and have been provided based on detailed consultation by the

	<p>grant partners including but not limited to organisations such as OFGEM relating to the criteria for ECO.</p> <p>The Policy is designed to enable funds to be used appropriately and to not fund works that households can / should pay for themselves. For example, the Policy clearly states that the duty to repair and maintain a home rests with the owner.</p>		
7	<p>How may the proposal affect each protected characteristic or group? The effect may be positive, negative, neutral or not known. Give reasons and if action is needed.</p>		
	Characteristic	Affect	Reason Action needed Yes / No
	Age	<p>As highlighted previously specific grants are aimed at assisting older (60 years and older) and very young (usually under 5 years of age) residents as these are the key at risk groups for a range of HHSRS risks. For example eradicating falls associated with baths particularly benefits those over the age of 60 whilst those most at risk from electrical hazards are those aged under 5 years.</p> <p>The Policy is specifically written to target assistance at the relevant vulnerable age group.</p> <p>As highlighted above age is a key factor in DFGs for example in 2020/21 a total of 532 adaptations were completed:</p> <ul style="list-style-type: none"> • 296 (56%) were for residents over the age of 65 of which 199 were for residents aged 75 or older. • 21 (4%) were for children (below the age of 18). 	
	Disability	<p>As highlighted above a key part of the Policy is delivery of assistance for the disabled. The Policy supports a range of streamlining process to make access to this help easier and faster for applicants. Over the last 10 years significant work has been undertaken to reduce the average cost of a DFG so that the strictly limited funds can help even more disabled people (and their broader households and support networks). For example in 2010 the average DFG was over £12,000 whilst by 2021 it was less than £5,000.</p>	
	Pregnancy and maternity	<p>Schemes such as Health Through Warmth will support where possible those who are pregnant and those with very young children including supporting those with children who were low weight at birth. Excess cold and damp in a home can have a significant impact on those who are pregnant and new born babies.</p>	
	Gender	<p>There is no anticipated detrimental impact. There may be more of a positive impact for women especially for the assistance that relates to older residents for example but not limited to DFG as we know that a significant proportion of DFG applicants are older people and the life expectancy of women is generally greater than that of men nationally and also within Walsall. https://www.walsallintelligence.org.uk/jsna/ (Chapter 4 Ageing well – data on mortality).</p> <p>As noted above there is likely to be positive impact for women</p>	

		from the Policy as a result of women continue to be pre-dominant care givers for young children including single parents.		
	Gender reassignment Marriage and civil partnership Race Religion or belief Sex Sexual orientation	<p>Applicants with other Protected Characteristics will be all equally able to apply for funding provided they meet other specific criteria for example:</p> <ul style="list-style-type: none"> • Their dwelling requires the relevant works • Their household income is below a certain threshold (depending on the grant source) <p>The service undertakes a wide range of publicity about new grant initiatives including targeted marketing that includes where the funding is geographically focussed updates to local elected members and community organisations.</p> <p>The service has had particular success at promoting grant and assistance schemes to residents from eastern European communities via an organisation known as NASHDOM CIC. This direct liaison has helped remove barrier to access that may have otherwise existed due to language.</p> <p>Many new residents to the borough especially from overseas will be in private rented accommodation. The council has a proactive relationship with landlords (and a range of community organisations) and ensures that they are aware of available funds and their duties to ensure their properties are in good condition.</p>		
8	Does your proposal link with other proposals to have a cumulative effect on particular equality groups? If yes, give details.			NO
9	Which justifiable action does the evidence, engagement and consultation feedback suggest you take?			
	A	No major change required No potential for discrimination or adverse impact has been identified and all opportunities to promote equality have been taken.		
Action and monitoring plan				
Action Date	Action	Responsibility	Outcome Date	Outcome
Update to EqIA				
Date	Detail			

Contact us

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