

# REPORT TO CABINET

**REPORT OF:** Portfolio Holder, Housing and Organisational Development

**REPORT NO:** HST25

**DATE:** April 2009

<b>TITLE:</b>	<b>South Kesteven District Council – Private Sector Financial Assistance Policy 2009-11</b>	
<b>KEY DECISION OR POLICY FRAMEWORK PROPOSAL:</b>	Key Decision	
<b>PORTFOLIO HOLDER: NAME AND DESIGNATION:</b>	Councillor Paul Carpenter Housing & Organisational Development Portfolio	
<b>CONTACT OFFICER:</b>	Teena Twelves 01476 406063 Email: <a href="mailto:t.twelves@southkesteven.gov.uk">t.twelves@southkesteven.gov.uk</a>	
<b>INITIAL IMPACT ASSESSMENT:</b>	Carried out and Referred to in paragraph (7) below:	Full impact assessment Required: No
<b>Equality and Diversity</b>		
<b>FREEDOM OF INFORMATION ACT:</b>	This report is publicly available via the Local Democracy link on the Council's website: <a href="http://www.southkesteven.gov.uk">www.southkesteven.gov.uk</a>	
<b>BACKGROUND PAPERS</b>	HST 12 Private Sector Financial Assistance Policy 2007/09 February 07 HST 17 Empty Homes Policy January 08 HST 21 Property Charges on Disabled Facilities Grants September 08	

## 1. RECOMMENDATIONS

- (a) It is recommended that the attached is adopted as the Council's private sector housing renewal assistance policy for 2009/10 and 2010/11 subject to available funding;
- (b) It is recommended that decisions on the application of discretionary policy should be delegated to the Portfolio Holder for Housing.

## 2. PURPOSE OF THE REPORT/DECISION REQUIRED

The Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 empowers local authorities to give financial assistance to improve living conditions in the private sector in order to meet local people's housing needs. The attached policy, being an update of the Council's existing policy for 2007/2009, proposes the continuation of a number of

schemes that fit with a range of both national and local priorities. Changes and updates made to the 2007/09 policy are:

- The introduction of a discretionary element for disabled facilities grant awards in accordance with Section 23 (2) of the Housing & Regeneration Act 1996
- Additional conditions relating to the award of empty property grants covering the need to consider that the property to be available for letting to someone off the Council's Housing Register for a period of up to 3 years
- The inclusion of other conditions as introduced by legislation e.g. mandatory DFG awards increasing to £30k and the imposition of property charges for certain DFG awards as agreed in September 2008 as part of report number HST12.

### **3. DETAILS OF REPORT (SUMMARY – USE APPENDICES FOR DETAILED INFORMATION)**

The Council is required to have a suitable policy in place to regulate its spending under the Act mentioned above. The attached policy targets the financial assistance available from the Council to the areas where priorities are best met. These include affordable housing, homelessness and decent homes. The policy covers mandatory areas such as disabled facilities grants, refers to other national schemes such as Warmfront and outlines a number of discretionary areas for council funding subject to availability. A range of conditions such as eligibility, repayments and charges to properties are detailed within the policy document. All the above accords with the Council's Quality Living priority theme.

The addition of a discretionary grant award element for DFGs is to provide greater flexibility in achieving outcomes for applicants. Recent cases and applications have shown that in cases where the proposed solution is likely to exceed the maximum mandatory amount, this is usually by an amount of less than £10,000.

### **4. OTHER OPTIONS CONSIDERED**

The Council is required to have an appropriate policy in place in accordance with legislation; following the last private sector stock condition survey across the district the Council has had a commitment to improve poor quality housing where and when resources allow. Areas such as mandatory Disabled Facility Grants (DFGs) require by their very nature a financial commitment from the council. Government commitment is to reduce the number of non decent homes occupied by vulnerable households in accordance with PSA 7; similarly there is a drive to bring more empty homes back into use as there is an increased need for housing. Funding

from regional and national government is readily available to support programmes of assistance and the Council has been successful in levering in over £750k in the past 2 years.

Whilst there is no specific requirement for the Council to provide financial assistance in certain areas covered by this policy the Council recognises it would be failing in its role as a housing enabler if it were not to use its wide ranging powers for housing renewal to benefit the health and well being of its residents and to improve the district as a whole.

## **5. RESOURCE IMPLICATIONS**

The Council's currently provides £500k per annum within its General Fund capital budget for disabled facilities grants which is underpinned by specific grant funding from Government of £254k in 2009/10. Any awards made as a discretionary DFG are subject to budget availability.

The Council has been awarded £506k by the East Midlands Regional Assembly for 2009/10 as an allocation for private sector renewal. In addition to this the Council has provided £100k from its own capital resources to provide funds for work around empty homes and energy efficiency.

Some of the funding from regional government is able to be used for the staffing resources to deliver the grants.

## **6. RISK AND MITIGATION (INCLUDING HEALTH AND SAFETY AND DATA QUALITY)**

The Council is clear that some of its private sector renewal financial assistance is subject the availability of resources. The main risk is therefore managing the expectations of applicants as regards the availability of grants. This is mitigated by active and on-going management of the resources on a month by month basis and reporting to and consideration by the Council's Capital Asset Management Group.

## **7. ISSUES ARISING FROM EQUALITY IMPACT ASSESSMENT**

This policy addresses the needs of vulnerable households and those with disabilities. Mandatory grants are provided in line with statutory conditions, and in including within the policy the facility to provide discretionary grants, consideration has been given to ensuring that funding is targeted at those most in need of assistance by determining their financial circumstances and only by offering grants where the relevant criteria are met.

## **8. CRIME AND DISORDER IMPLICATIONS**

There are no significant crime and disorder implications

## **9. COMMENTS OF SECTION 151 OFFICER**

The Council has approved a capital budget of £500K for the financial year 2009/10 and has received a grant of £254K from Government in respect of the statutory awards of £30,000 (per case). It is important that any discretionary 'top up' above the statutory amount is clearly demonstrable and follows the local policy. I would recommend that where a discretionary top up is awarded then either this is delegated to the Corporate Head for Sustainable Communities or the relevant Portfolio Holder.

## **10. COMMENTS OF MONITORING OFFICER**

If the council is to introduce a discretionary element for disabled facilities grants, criteria must be established for the use of that discretion. Members should make the recommendation to enable the necessary change to be made to the Constitution via the Constitution Committee for approval of the change in the constitution by Council.

## **11. COMMENTS OF OTHER RELEVANT SERVICE MANAGER**

*None.*

## **12. APPENDICES:**

**Document entitled Private Sector Financial Assistance Policy 2009/11**

## **South Kesteven District Council**

### **Private Sector Housing Financial Assistance Policy 2009/2011**

#### **Introduction**

The Private Sector Housing Financial Assistance Policy is made in accordance with the Regulatory Reform (Housing Assistance) (England and Wales) Order 2002.

The purpose of the Policy is to direct the Council's power to give financial assistance to improve living conditions in the private sector in order to meet the housing needs of local people.

The Council's Housing Strategy 2004 - 2009 identified three key priorities for the district –

- Affordable housing
- Homelessness and housing choice
- Decent homes

This Policy provides for a number of schemes in accordance with these priorities through regulating the grant-giving power of the Council in the private housing sector.

The Policy promotes owners' and landlords' responsibility to repair and improve housing conditions by offering loans/ grants and referring people for other available assistance.

#### **Objectives**

The Policy aims to give financial assistance to local residents to improve housing conditions to meet the following objectives.

1. Bring 260 non decent homes to decent homes standard every year;
2. Ensure 70 households with people with mobility problems or special needs can continue to live in their own homes;
3. Work to eliminate fuel poverty within vulnerable households;
4. Bring 15 empty homes back into occupation every year.

## Grants detail

### Mandatory Disabilities Facilities Grant (DFG)

Purpose of assistance	Section 23(1) of the Housing & Regeneration Act 1996 states that the Housing Authority must approve a grant for eligible works. These include facilitating access to and from the dwelling, facilitating access to a room used as or usable as the principal family room; facilitating access to a room used or usable for sleeping, or providing a room for the disabled person; facilitating access to toileting and bathing facilities, or providing such facilities, and facilities for the preparation and cooking of food. This section sets out to provide assistance for those circumstances and to provide specialist adaptations to enable disabled persons to live safely in their own home.
Main objective	2
Eligible persons	Any disabled person, owner occupier or tenant, with a qualifying referral from the Lincolnshire County Council Occupational Therapy service.
Eligible properties	A permanent or legal residence including dwellings, mobile homes, caravans and houseboats which is the primary or sole residence of the applicant.
Eligible works	<p>Eligible work specified according to the referral from the Lincolnshire County Council Occupational Therapy service, subject to the Council's assessment of its reasonableness and practicality.</p> <p>The referral will cover essential work to provide access or facilities for personal care, including bedroom and kitchen facilities, and works to improve safety.</p> <p>The work must be necessary and appropriate to meet the needs of the disabled person as detailed by Occupational Therapy services.</p> <p>The works must be reasonable and practical having regard to the age and condition of the dwelling or building.</p>
Priority system	<ol style="list-style-type: none"><li>1. access to the home</li><li>2. access to toileting</li><li>3. access to bathing facilities</li><li>4. kitchen adaptation</li></ol>

	<p>5. access to garden</p> <p>(Consideration will be given to individual cases when applying the priority system)</p>
Maximum grant	£30,000
Means test	All applications are subject to a test of financial resources of eligible persons, apart from applications made on behalf of children under 19 as these are exempt from means testing.
Conditions	<p>Responsible parties must notify the Council if the person who received the grant no longer resides in the property or ceases to use any portable equipment which is provided through grant aid assistance within 10 years of completion of the works funded by grant aid.</p> <p>The Council will carry out an assessment to see if it is practically possible to recycle any portable equipment for another disabled facilities grant application.</p> <p>For the grants with a value greater than or equal to £10,000, and where additional floor space is created within the property, a Local Land Charge will be placed on the property for 10 years from the date the grant-aided work is completed.</p>
Repayment condition	<p>If the property is sold within 10 years of completion, a sum may be repayable upon disposal.</p> <p>The criteria for repayment are set out within paragraph 3 (2) of the Disabled Facilities Grant (Conditions relating to approval or payment of grant) General Conditions 2008. These criteria will be applied to determine whether or not a grant should be repaid on disposal of a property.</p>

## Discretionary Disabilities Facilities Grant (DFG)

Purpose of assistance	<p>Section 23(2) of the Housing &amp; Regeneration Act 1996 states that the Housing Authority may approve a grant for 'making the dwelling or building suitable for the accommodation, welfare or employment of the disabled occupant in any other respect'. This section sets out to provide assistance for those circumstances.</p> <p>The areas where the Council may award a discretionary grant include:</p> <ul style="list-style-type: none"> <li>(a) To provide for small scale adaptations to either fulfil needs not covered by mandatory DFGs or in exceptional circumstances to avoid the procedural complexities associated with mandatory DFGs to deliver a speedy remedy for very urgent adaptations.</li> <li>(b) To provide a top up to a mandatory grant award where: <ul style="list-style-type: none"> <li>(i) the works exceed the mandatory limit, or where for whatever reason the applicant cannot afford their required contribution to a mandatory grant;</li> <li>(ii) works are recommended that are not eligible for a mandatory grant under Section 23(1) of the Housing and Regeneration Act 1996 but which may include areas such works to provide more satisfactory living arrangements for a disabled applicant having regard for other members of the household or possibly providing extra space to provide a complete solution to the needs of the disabled person.</li> </ul> </li> <li>(c) To offer payment to assist people to move to more suitable accommodation</li> </ul>
Main objective	2
Eligible persons	The eligibility criteria are as for the Mandatory DFG
Eligible properties	The eligibility criteria are as for the Mandatory DFG.
Eligible payment	The cost of adaptation to meet the requirement specified in the OT specification, in accordance with the Council's standard specification and standard costs.
Maximum grant	Awards will normally be limited to a maximum of £10,000 for discretionary grants although the Council

amount	has the discretion to determine a reasonable amount in excess of this in exceptional circumstances.
Conditions	A Local Land Charge will be placed on the property for 10 years from the completion of the property purchase (in the event of relocation) or the completion of the grant aided work.
Repayment condition	<p>The grant must be repaid upon the disposal of the property within 10 years from the completion date of the grant-aided work.</p> <p>The Council reserves the right to determine whether or not it will require any discretionary grant to be repaid.</p>
Other information	<p>Each application is approved on a strict case by case basis.</p> <p>The Council has the discretion to determine the amount of any grant payment taking into account the reasonableness of each case.</p> <p>Discretionary grants are subject to the availability of funding.</p>

## Warmfront top up grant

Background	<p>The Warmfront Programme is a national scheme to install grant-aided energy efficiency measures in owner occupied or privately rented homes.</p> <p>The programme has its criteria of eligible persons, and is administrated independently from the Council.</p> <p>Warmfront Grant has a maximum of £2700, or £4000 for oil central heating. The Council funds a Warmfront Top-up Grant, where the Warmfront grant does not cover all the costs of the works.</p>
Main objective	1, 3
Purpose of assistance	<p>To install grant-aided energy efficiency measures to people's homes</p> <p>To improve thermal comfort of vulnerable people.</p>
Eligible persons	Households who have received Warmfront Grant confirmation, which identifies a client contribution to be paid.
Eligible work	Strictly in accordance with the Warmfront Programme, related to and evidenced by the Warmfront grant confirmation letter.
Grant	<p>Strictly in accordance with the client excess amount specified in the Warmfront Grant Confirmation letter, up to £2,000 maximum.</p> <p>For example, the grant is £200 if the client excess is £200; the grant is £2,000 if the client excess is £3,000.</p>
Condition	There are no conditions attached by the Council to the Warmfront top up grant.
Other information	See the Warmfront scheme leaflet.

## Better Homes Grants for vulnerable households

Purpose of assistance	To reduce the number of non decent homes  To increase the number of vulnerable people living in decent homes
Main objective	1
Eligible persons	<p>Owner occupiers or private tenants, who are in receipt of one or more of the principal income related or disability benefits –</p> <ul style="list-style-type: none"> <li>• Income support (Employment and Support Allowance)</li> <li>• Working tax credit</li> <li>• Housing benefit</li> <li>• Council tax benefit</li> <li>• Child Tax benefit (annual income no more than £15,460, subject to change every April)</li> <li>• Pension credit</li> <li>• Income based job seekers allowance</li> <li>• Attendance allowance</li> <li>• Disability living allowance</li> <li>• Industrial injuries disablement benefit</li> <li>• War disablement pension</li> <li>• Incapacity benefits (including Employment and Support Allowance)</li> </ul> <p>People who have not received a previous Better Homes Grant, or Decent Homes Grant, within 3 years prior to application.</p>
Eligible property	<p>Private properties are eligible to receive a Better Homes Survey, if they have not received one within 3 years prior to the survey date, and if they were built before 1990.</p> <p>Properties are eligible if the Better Homes Survey identifies elements failing decent homes standards, and could not be rectified by the Warmfront Grant.</p> <p>Properties are not eligible to receive more than one</p>

	<p>Better Homes Survey within 3 years.</p> <p>A permanent, legal and sole residence of the applicant, including dwellings, mobile homes, caravans and houseboats.</p> <p>The applicant should have lived in the property for more than 3 years.</p>
Eligible work	<p>Essential work to bring properties up to and above decent homes standards. Common examples are -</p> <ul style="list-style-type: none"> <li>• Electrical rewires,</li> <li>• Window replacement,</li> <li>• Door replacement.</li> </ul> <p>Eligible work does not include heating improvement or repairs. If the property needs heating improvement or repairs, a referral will be made to Warmfront for grant aided work to be carried out. The Warmfront grant is a separate grant from Council's Better Homes Grants.</p> <p>Reasonable and practical works having regard to the age and condition of the dwelling, mobile homes, caravans and houseboats.</p>
Grant	<p>Up to 100% of eligible cost or £5000 maximum per property. No more than one grant for the same property will be considered within a 3-year period.</p> <p>The Council retains the discretion to apply means testing to determine the maximum amount a household is eligible to apply for.</p>
Condition	<p>The property is the sole residence of the applicant. The applicant has lived in the property for at least 3 years prior to the application.</p> <p>A Local Land Charge will be placed on the property and will last for 5 years. The 5 year repayment condition applies.</p> <p>The landlord's consent is required if the property is privately rented.</p>
Repayment condition	<p>The 5 year repayment condition requires the grant to be repaid upon the disposal of the property within 5 years from the completion date of the grant-aided work. The amount is repaid on a sliding scale.</p>

	<ul style="list-style-type: none"> <li>• If sold within one year of completion, the full amount is repayable;</li> <li>• If sold after one year, but within two years of completion, 80% of the full amount is repayable;</li> <li>• If sold after two years, but within three years of completion, 60% of the full amount is repayable;</li> <li>• If sold after three year, but within four years of completion, 40% of the full amount is repayable;</li> <li>• If sold after four years, but within five years of completion, 20% of the full amount is repayable;</li> <li>• If sold after five years, the condition does not apply.</li> </ul>
Other information	The grant is subject to Council's funding availability.

## Better Homes Loans

Purpose of assistance	To reduce the number of non decent homes
Main objective	1
Eligible person	Home owners not eligible for the Better Homes Grant.
Eligible properties	Same as the Better Homes Grant.
Amount	Up to £5000 maximum per property, subject to any upper limit placed by the Credit Union.
Condition	<p>Same as the Better Homes Grant.</p> <p>If the applicant is a private tenant –</p> <ul style="list-style-type: none"> <li>• Landlord consent is required if the property is privately rented</li> <li>• The loan is granted provided that the landlord is fulfilling the repair obligation to meet statutory minimum requirement</li> <li>• Landlords and tenants are to decide between themselves as to who are responsible for the repayment of the loan</li> <li>• This must be decided before the loan is granted</li> </ul> <p>In all cases, the repayment plan will run no longer than 3 years, in accordance with the Credit Union policy.</p> <p>A Local Land Charge will be placed on the property for 3 years from the completion of the work, and any remaining balance must be repaid upon disposal of the property.</p>
Repayment condition	The loan needs to be fully repaid upon the sale of the property.
Other information	The Loan is operated in partnership with Lincoln Credit Union.

## Empty homes fund

Purpose of assistance	To bring empty homes back into occupation
Main objective	4
Eligible persons	Eligible applicants must be owners of the empty property or people representing the owners' interest.
Eligible properties	Properties within South Kesteven District.  Properties that have been empty for more than 6 months at the time of application, supported by appropriate evidence.
Eligible costs	Eligible costs the Fund could pay for –  Capital repair cost to the property. For example: <ul style="list-style-type: none"><li>• Material costs</li><li>• Contractor's labour costs</li></ul> Costs not eligible be paid for by the Fund –  Professional fees not related to the labour or materials of the improvement work. For example: <ul style="list-style-type: none"><li>• Estate agent fees</li><li>• Insurance costs</li><li>• Surveyor fees</li><li>• Architect fees</li></ul>
Amount	Up to £3,000 per property
Conditions	The council will carry out a survey at the property following an application.  Commitment to carry out the work must be evidenced at the time of application.  The property must be brought back into use within 12 months of the fund payment.  The Council will require that the property is available for letting purposes and the tenant placed in the property shall normally be nominated from the Council's Housing Register for a period of 3 years at a rent not exceeding the local housing allowance level for the type of property in the relevant area at the time of the grant award.

	A Local Land Charge will be applied to the property.
Repayment condition	The fund is to be fully repaid if the property is not occupied within 12 months of the fund payment.
Other information	Please refer to the Empty Homes Fund application form for more details.

## **General Conditions of financial assistance**

### Legal and financial advice

Applicants should seek their own legal advice regarding the Local Land Charge which will be placed on the property and their own financial advice regarding the loan.

### Ineligible work

The following works are not eligible for assistance –

- Where the owners have a statutory duty to carry out the necessary works and it is reasonable in the circumstances for them to do so.
- Repair to any shed, outbuilding, or appurtenances.
- Where the works have started or have completed at the time of enquiry.
- Works expected to be covered by standard housing insurance.
- Works of land drainage.

The Council retains the discretion to assess the eligibility of certain work in complex cases.

### **Summary**

The Policy gives financial assistance to private landlords, tenants and owner occupiers to improve housing conditions within the district.

The Policy promotes owners' and landlords' responsibility to repair and improve housing conditions by offering loans/ grants and referring people for other available assistance.

SKDC

April 2009

## Initial Equality Impact Assessment Template

Section: <b>Housing Solutions</b>		Officers undertaking assessment: <b>Kevin Martin</b> <b>Teena Twelves</b>
Name of policy, procedure etc:  Private Sector Financial Assistance Policy 2009/11	Date of Assessment:  24 <sup>th</sup> March 2009	Is this a new or existing policy?  Existing Policy updated with additional discretionary provision for disabled facilities grants
<p><b>Policy Aims</b></p> <p>Briefly outline the policy/procedure/service by putting it into context and describe its aims, objectives and purpose</p> <p>The policy is published for the Council to be able to exercise its powers to improve housing and living conditions in the private sector using grant assistance under the Regulatory Reform Act (2002)</p>		
<p>Who is intended to benefit from the policy?</p> <p>Residents in the private sector requesting assistance to improve the living conditions in their homes.</p>		
<p>Who implements the policy, and who is responsible for the policy?</p> <p>Kevin Martin, Service Manager for Housing Solutions implements the policy. The Council as a whole is responsible for the policy.</p>		
<p>Who are the main stakeholders in relation to the policy?</p> <p>Residents (excluding those who are tenants of SKDC) Lincolnshire Adult &amp; Childrens Services Warmfront Partnership Voluntary agencies South Kesteven District Council</p>		
<p>Are there any other organisations or partners involved in the delivery of the service?</p> <p>Who is the lead or accountable body?</p> <p>South Kesteven District Council is the lead body; other partners include Lincolnshire Adult &amp; Children's Services, Lincolnshire Home Improvement Agency, private contractors and the Warmfront Partnership</p>		

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Does the policy contribute to the achievement of the Council's Equality and Diversity Policy? Can any aspects of the policy contribute to inequality? Please explain your answer.

The policy is in the main targeted towards private sector residents who are classed as vulnerable within the context of legislation. All the assistance identified within the policy is subject to specific eligibility criteria e.g. disability, financial. Means testing is required by legislation.

Some of the assistance is available to U19s, some to 60+, some to all age groups.

The policy will be delivered equally to all community groups based on needs assessment and thus any potential differential impact is expected to be minimal.

## **Evidence**

What are the existing sources of evidence and mechanisms for gathering data?

Needs assessments for such things as disabled facilities grants, warmfront top-up grants and better homes grants are carried by partners outside of SKDC.

This information is collected by SKDC and used to facilitate the award of grant assistance.

The metadata from this information enables us to carry out equalities monitoring as regards the communities accessing the services under this policy.

What monitoring data is available on the number of people who use the service or are affected by the policy? Who holds this information?

As part of our record keeping the Housing Solutions Team keep the relevant information required and allowed under Data Protection as regards those that use the service.

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If no monitoring has been undertaken, will this be done in the future? If so, specify what arrangements you intend to make. If you do not intend to do any monitoring, please provide your reason for this decision.

Not applicable

What are the key performance indicators and targets attributed to the policy?

<p>Ni187 Affordable Warmth &amp; increased numbers of households benefitting from warm homes</p> <p>Increased numbers of households living in decent homes</p> <p>No of empty homes brought back into use</p>
<p>What consultation has been carried out with stakeholders and service users previously about the policy?</p> <p>The policy builds on a similar financial assistance policy which ran from 2007/09. Partners from Lincolnshire Adult &amp; Childrens services have contributed to policies around disabled facilities grants, similarly the Warmfront Partnership have been consulted on the policies towards affordable warmth.</p> <p>As this is a financial assistance policy much of it relates to meeting Government aspirations relating to the private sector. The Government carries out wide ranging consultation before defining its expectations through legislation.</p>
<p>Is there any evidence that different groups have different needs, experiences, issues and priorities in relation to the particular policy or function? Please explain your answer.</p> <p>The policy specifically targets vulnerable households. The Occupational Therapy services provide all referrals for adaptation works for the disabled client groups. The Warmfront partnership provide referrals relating to affordable warmth and decent homes.</p> <p>.</p>
<p>Is there any informal feedback from managers, staff or voluntary organisations?</p> <p>There are regular meetings with the Occupational Therapy service at which specific cases are discussed in relation to the Disabled Facilities Grants element of this policy. Similar quarterly meetings are held with the Warmfront service provider. This information has influenced the development of this policy.</p>
<p>Is there a complaints system? If yes, are complaints monitored by race, gender , and disability as a minimum?</p> <p>Yes. Lincolnshire Home Improvement Agency handle complaints relating to disabled facilities cases that they provide advocacy services for. The Warmfront Partnership also have a formal complaints procedure.</p> <p>South Kesteven District Council have a formal complaints system which is used within the Housing Solutions service.</p>

What further evidence is needed to understand the impact upon equality?

On-going monitoring will be carried out. This policy outlines grant assistance which is both demand led and subject to a number of eligibility criteria.

Details of all grant awards are kept as a matter of course.

More information could be sought from the main partners that are the first point of contact with the majority of customers accessing the financial assistance available

## Impact

Does the data show different impact upon different groups? What existing evidence is there for this?

Race: None that we are aware of

Gender: As the average lifespan for women is longer than men it is likely that more females than men are using this service in the long run.

Age: Age is not a specific criteria to assess eligibility to the various grant schemes

Religion: None that we are aware of

Disability: Some of the policy relates specifically to disabled facilities grants. The Council is obliged to award certain types of grants under the Housing Act 1996.

Sexual Orientation: None that we are aware of.

Do these differences amount to an adverse impact?

Not in the opinion of those carrying out the assessment

Are there concerns that the policy could have a differential impact on any other groups of people e.g. those with dependants/caring responsibilities, those with an offending past, those with learning difficulties, transgender or transsexual people.

What existing evidence (either presumed or otherwise) do you have for this? Please explain your answer.

No. The financial assistance policy is aimed at those classed as vulnerable. Other professionals such as OTs and Decent Homes assessors visit these customers in their home to assess need in the first instance.

Are there any factors that might account for differential impacts or non-achievement of the policies outcomes, such as barriers that prevent people from fully accessing the service? For example, communication difficulties, physical access, information not being accessible, use of language, childcare responsibilities?

Where there are potential barriers to accessing the service, for example learning disabilities, the end service user is supported in accessing the service by external agencies, such as the Adult Social Care and Occupational Therapy teams.

## Future Actions

Should the policy or function proceed to a Full Impact Assessment? (Please explain your reasoning)

Yes. Whilst the policy is aimed at vulnerable households; further analysis and monitoring could be undertaken to understand whether equality and diversity aspects are being met. This would involve asking partners organisations for more information from the customers they come into contact with on our behalf.

## ACTION PLAN

Action	Completion Date	Responsibility	
Analyse details around DFG applicants	December 09	Kevin Martin	
Analyse details around Warmfront Top up applicants	December 09	Kevin Martin	
Analyse details around decent homes applicants	December 09	Kevin Martin	
Date Full Impact Assessment should commence April 2009			
Review Date: December 2009			
Review Date			
Review Date			
Signed: Teena Twelves	Date: 24.03.09		