

Full Equality Impact Analysis



Title of review	PROPOSED ADOPTION OF A HOUSING ASSISTANCE AND DISABLED ADAPTATIONS POLICY
Service	Housing Services
Date of review	15 th December 2014
Date of next review	N/A
Lead officer, Job Title and Service	Tanya Wenham, Head of Housing Services
Review team	Tanya Wenham, Steve King, Dave Farmer, Steven Boyle
Scope of the analysis	<p>As a Local Housing Authority ("LHA"), Thanet District Council is required to have a Housing Assistance Policy to enable it to offer discretionary funding towards the improvement of homes in the private sector.</p> <p>The existing policy was last reviewed in 2009. The amount and type of funding available has changed, as have the councils priorities and therefore the policy needed to be updated.</p> <p>The policy not only covers the discretionary funding available but also covers the mandatory disabled facilities grant programme and provides clarification on the councils policies surrounding this grant.</p> <p>The purpose of this review is to consider the equality implications of the policy.</p>
Beneficiaries	<p>The vast majority of residents in Thanet live in private sector housing. The policy mainly covers services for vulnerable and disabled residents. The empty property loans are available to all residents wishing to buy an empty property in the designated area.</p> <p>All Protected Characteristics will be represented within the beneficiaries.</p>
Stakeholders	<p>Stakeholders include:</p> <ul style="list-style-type: none"> • Residents; • Owners/landlords of private residential premises; • Council Members; • Council staff; • Public services, such as the Police, Kent County Council, NHS, and the Kent Fire & Rescue Service; • Community and voluntary organisations.

Relevant data and research	N/A
Access complaints	None recorded.
Consultation	<p>The document was subject to a full consultation that ran from 11th August 2014 to 24th October 2014. Copies of the document were circulated electronically to interested parties, including:</p> <ul style="list-style-type: none"> • All councillors; • Senior Management Team; • Managers and officers in related services within the council; • Agencies and services with an interest in the subject • Online public consultation
Results of consultation	The consultation did not highlight any concerns relating to the Protected Characteristics or the aims of the Public Sector Equality Duty.
Relevance to the Duty:	
Do your proposals contribute towards or impact on any of the aims of the duty?	
<p>1. Eliminate unlawful discrimination – harassment, victimisation and any other conduct prohibited by the Act;</p> <p>The proposed Policy restricts the funding that is available to mainly benefit vulnerable and disabled residents. The policy will be equally and fairly applied to all those who are eligible to apply for assistance under the policy. The empty homes loan is available to all residents. No potential for unlawful discrimination has been identified.</p>	
<p>2. Advance equality of opportunity – between people who share a protected characteristic and people who do not share it by;</p> <ul style="list-style-type: none"> • removing or minimising disadvantages suffered by people due to their protected characteristics; • meeting the needs of people with protected characteristics; and • encouraging people with protected characteristics to participate in public life or in other activities where their participation is low. <p>Persons from vulnerable groups can sometimes have limited housing choices. In particular, families with young children, older persons and those with a disability can find themselves in poor quality accommodation. The policy aims to safeguard the health, safety and welfare of these Protected Characteristics (Age and Disability). By doing so the funding available is restricted and there may be some households on low income who do not meet the qualification criteria who are unable to access the funding but are still in need. This is a necessary restriction due to the small amount of funding available which must be targeted on a priority basis.</p>	
<p>3. Foster good relations – between people who share a protected characteristic and people who do not share it, by; tackling prejudice and promoting understanding between people with a protected characteristic and others.</p> <p>Having regard to this aim, the proposed Policy may have a negative impact as the policy favours those with a protected characteristic. As detailed above this may disadvantage households that</p>	

are in need but do not meet the specified criteria.

Equality impacts raised or identified:

The proposed Policy document shall be equally and fairly applied to everyone who meets the eligibility criteria. As such, no adverse equality impacts have been identified. However, certain beneficial impacts have been identified in respect of some of the Protected Characteristics. These are shown in the table below.

Protected Characteristic	Commentary	
Age	Impact	<p>Yes.</p> <p>Poor housing conditions can negatively affect the health, safety and well-being of all residents, irrespective of age. However, certain housing deficiencies can have a more serious and harmful impact on individuals of particular ages. For example, older persons will suffer more in cold homes.</p> <p>The application process for a grant/loan is often complicated and this could be a disadvantage if an individual is unable to make the application. The policy takes this into account by ensuring that agency costs are covered in the grant/loan so that the individual can benefit from assistance from a suitable agency.</p>
	Mitigation	Not required, as the impact is positive.
Gender	Impact	<p>No.</p> <p>The means of assessing eligibility does not take gender into account.</p>
	Mitigation	Not required as no impact has been identified, negative or positive.
Race	Impact	<p>No.</p> <p>The means of assessing eligibility does not take race into account.</p>
	Mitigation	Not required as no impact has been identified, negative or positive.
Disability	Impact	<p>Yes.</p> <p>The policy specifically identifies disabled residents as a beneficiary of assistance. The policy also aims to safeguard disabled residents by making their homes safer for them to live in.</p> <p>The application process for a grant/loan is often complicated and this could be a disadvantage if an individual is unable to make the application. The policy takes this into account by ensuring that agency costs are covered in the grant/loan so that the individual can benefit from assistance from a suitable agency.</p>

	Mitigation	Not required, as the impact is positive.
Religion or belief	Impact	No. A person's religion or belief has no bearing on how the policy is applied.
	Mitigation	Not required as no adverse impact has been identified.
Gender reassignment	Impact	No. The means of assessing eligibility does not take gender reassignment into account.
	Mitigation	Not required as no impact has been identified, negative or positive.
Sexual Orientation	Impact	No. The means of assessing eligibility does not take sexual orientation into account.
	Mitigation	Not required as no impact has been identified, negative or positive.
Marriage & Civil Partnership (Aim 1 only)	Impact	No. The means of assessing eligibility under the policy does not take marriage or civil partnership into account.
	Mitigation	Not required as no impact has been identified, negative or positive.
Pregnancy & Maternity (Aim 1 only)	Impact	No. The policy does not take pregnancy and maternity into account. But this may be relevant when considering eligibility under certain benefit criteria
	Mitigation	Not required as no adverse impacts have been identified.
<p>Overall conclusions and options to be put before decision maker (if contributing towards a report) or to take forward to develop your service (if reviewing a service)</p> <p>The Housing Assistance and Disabled Adaptations Policy specifically identifies some of the protected characteristics as direct beneficiaries of the policy.</p> <p>The policy is aimed at targeting resources at those households most in need of assistance.</p>		
Actions arising from analysis:		
Action	Responsible Officer	Deadline
None.		

Acceptance

Name and signature of assessing officer and date of assessment.

Name: Tanya Wenham **Position:** Head of Housing Services

Tanya Wenham

Signed:

Date: 8th January 2015