

Thanet District Council (TDC) Equality Impact Assessment

Step one: test for relevance

1 Person responsible for this assessment

Name:	Julia Gavriel		
Job title:	Service Improvement Officer		
Phone:	07757118574		
Service area:	Tenant & Leaseholder Services	Date of assessment:	13.02.24

2 Others involved in carrying out the analysis

Name:	Julia Gavriel (Service Improvement Officer)
Name:	Tobin May (Repairs Coordinator)
Name:	Ben summers (ASB Caseworker)

3. Description of strategy, policy, service, project, activity or decision

Title:	Aids & Adaptations Policy
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Is it new?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
A review of existing?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

3.1 Aims and objectives

Consider: **what** you are doing? **why** you are doing it? **who** will benefit?

To provide clarity over the aids and adaptations that can be carried out for tenants. To provide guidance for officers and OT professionals
 To enable tenants with disabilities to live independently within their home by providing a range of adaptations.
 To support the timely discharge from hospital of tenants, who require adaptations to enable them to return home.
 To enable new tenants with disabilities to move into their new home.

3.2 What outcomes are expected? Who is expected to benefit?

Tenants with disabilities are able to stay in their homes for longer if they are specially adapted to meet their current and future needs. There is less need to transfer to alternative accommodation.

Tenants will be helped to live independently.

Officers will be able to refer to the policy to advise tenants.

To advise the KCC Occupational Therapy department.

Who is expected to benefit:

- Residents with physical disabilities.
- Officers
- KCC Occupational Therapy department
- Any other relevant agencies

4 Who is affected?

4.1 Which groups or individuals does the strategy, policy, service, project, activity or decision affect?

For example, the Council, employees (including temporary workers), other public authorities, contractors, partner organisations, wider community, others.

Tenants with mobility issues, physical disabilities and their families.

Contractors will have a clear remit.

Partner agencies including Social Services and Occupational Therapy services.

TDC officers who will have clarity about the responsibilities of TDC.

4.2 Does the strategy, policy, service, project, activity or decision relate to a service area with known inequalities? (Give a brief description).

Yes - the policy provides support for tenants with mobility issues and disabilities.

5 Equality Act 2010

How does the strategy, policy, service, project, activity or decision actively meet the public sector equality duties to:

Eliminate unlawful discrimination (including harassment, victimisation and other prohibited conduct)

Linked to other housing legislation and the [TDC Equality and Diversity Policy](#), also with reference to the Equality Act 2010.

Adaptation is provided on the instruction of the KCC Occupational Therapy department. TLS does not make a judgement with reference to the person, only to the property (in terms of suitability for the adaptations).

Advance equality of opportunity (between people who share a protected characteristic and people who do not share it)

Increasing independence, within their homes for tenants with physical disabilities. Allowing people to stay in their current homes whenever possible.

Improving the relationship between tenant and TDC.

Foster good relations (between people who share a protected characteristic and people who do not share it). Could it have an adverse impact on relations between different diverse groups?

Tenants will be treated with respect and empathy based upon their identified needs

6 Priority

The following questions will help you to identify whether this 'service' is a high priority. Please answer all questions with particular reference to the protected characteristics; race, gender, gender reassignment, disability, religion or belief, sexual orientation, age, marriage and civil marriage/partnership and pregnancy and maternity.

Please provide a comment for each answer, providing evidence for your answer, regardless whether you have answered yes or no.

Questions	Yes	No
1. Are there any particular groups who may have trouble accessing the 'service'?		x
<p>Comments: TDC officers may refer to KCC OTs. TDC is also advised by KCC and multi-agencies including Social Services and NHS . We carry out tenancy audits that can identify the need for aids and adaptations. In which case the tenant will be referred to KCC OT service. Tenants that cannot access the service are assisted by our officers</p>		
2. Does your information suggest that some groups of people are less satisfied than others with this 'service'?		x
<p>Comments: All referrals come via KCC (assessment is undertaken by a third party). Where there are complaints about the recommendations we would refer back to KCC. There is evidence of complaints where adaptations/aids are requested without going through the proper process of requesting an OT assessment. Or disagreeing with the assessment. There are sometimes complaints about the contractor we have not received complaints about the service.</p>		
3. Will this service have a significant impact on any of our residents?	x	
<p>Comments: There will be a significant positive impact in the quality of life of the resident. The policy changes are all positive. The revisions are:</p> <ul style="list-style-type: none"> ● to remove rent arrears as a reason to not carry out an adaptation ● to simplify the dispute process by guiding tenants to the complaints process ● removing the timescales for completion of various adaptations ● add our methodology for prioritisation of cases 		
4. Do you have any evidence that discrimination, harassment and/or victimisation could occur as part of this service?		x
Comments:		

A third party assessment is carried out by KKC OT service. Only the property is assessed by our officers for the suitability of recommended aids and adaptations.		
5. Do you think the service will hinder communication and negatively impact relations between the organisation and its employees, residents, contractors or anyone else?		x
Comments: Third party assessment - working towards a positive outcome. The policy is in place to aid communication. OT assessment is in the name of the person. Subsequently the documentation refers to the property not the person and is recorded against the address.		
6. Does this service need to improve the way in which it is communicated to people who have literacy, numeracy or any other access needs?		x
Comments: The multi agency approach means that there are multiple communication channels. The policy will be provided on the TDC website alongside FAQs. Also where it will be accessible for screen readers. The language in the policy has been screened for readability. Officers will be able to explain the policy in person or on the telephone. Customer Transaction team have a copy of the process map as well as the policy to aid with any telephone enquiries. They can also access FAQs on the website.		
7. Does consultation need to be carried out?		x
Comments: The policy is to provide revisions for a process already in place. Feedback has been provided by Thanet Tenant and Leaseholder Group (TTLG)		

In order to assess the priority of your 'service' please complete the table below by adding up how many questions you answered yes to and following the appropriate action.

Priority	Number of questions answered 'yes'	Rating	Action
High	3 or more		Continue to section 2
Medium	1 to 2	x	Please provide evidence to any questions you answered 'yes' to in section 1. Test for relevance complete (sometimes a full assessment may be required).
Low	0		Test for relevance complete.

If, following the completion of the test for relevance, a full assessment is not required, go straight to the declaration. If a full assessment is required, go to Step two: full equality impact assessment.

Step two: full equality impact assessment

1 Could the strategy, policy, service, project, activity or decision have a **negative, positive or neutral** effect on groups or individuals?

Consider:

What you are doing?

Why are you doing it?

How you are doing it?

Who can access the service easily and who may not be able to access the service and **why**?

The full analysis explores ways to reduce or eliminate barriers and/or negative impacts.

Protected characteristics	N e g a t i v e	P o s i t i v e	N e u t r a l	Evidence/Reasoning (Consider any barriers which will have negative impact and/or good practices giving positive impact)
<p>Age</p> <p>Consider:</p> <ul style="list-style-type: none"> • The way younger and older people access services may be different • Use of technology • Child care/care of other dependant • Timings/flexibility, such as work patterns • Transport arrangements • Venue location 				<p>Recommendations:</p>
<p>Disability (Includes: physical, learning, sensory (deaf/blind), mental health)</p> <p>Consider:</p> <ul style="list-style-type: none"> • Communication methods • Accessibility – venue, location, transport • Range of support needed to participate • Hearing Loops/Interpreters • Disability awareness training for employees 				<p>Recommendations:</p>
<p>Race (Includes; gypsy, travelling, refugee and migrant communities)</p> <p>Consider:</p>				<p>Recommendations:</p>

<ul style="list-style-type: none"> • The size of the BME communities that your service/project affects. • Language(s) spoken/understood. • Culture, such as hygiene, clothing, physical activities, mixed gender activities. • What access support can you offer? 			
<p>Religion, faith or belief</p> <p>Consider:</p> <ul style="list-style-type: none"> • The diversity within the communities that your service/project affect • Prayer times, meal times, food (some religions do not eat meat), cultural habit or belief, religious holidays such as Ramadan • Awareness training for employees 			<p>Recommendations:</p>
<p>Pregnancy and maternity</p> <p>Consider:</p> <ul style="list-style-type: none"> • Flexible hours of the service/project • Is there access to a private area for breastfeeding mothers? 			<p>Recommendations:</p>
<p>Gender</p> <p>Consider:</p> <ul style="list-style-type: none"> • The impact on men and women • Child care/care of other dependant • Mixed/single gender groups/activities • Timing of services/projects 			<p>Recommendations:</p>
<p>Sexual orientation (Includes: lesbian, gay, bisexual)</p> <p>Consider:</p> <ul style="list-style-type: none"> • LGB people should feel safe to disclose their sexual orientation without fear of prejudice • Make it clear you recognised civil 			<p>Recommendations:</p>

marriage and partnerships <ul style="list-style-type: none"> • Awareness training for employees 				
Transgender Consider: <ul style="list-style-type: none"> • Trans people should be able to disclose their gender identity without fear of prejudice • Making it clear you have a Trans policy and process • Awareness training for employees 				Recommendations:
Marriage and civil marriage/partnership Consider: <ul style="list-style-type: none"> • All couples or partners, regardless of gender, should be able to access services 				Recommendations:

Outsourced services	
If your policy/process is partly or wholly provided by external organisations/agencies (such as Civica or Capita), please list any arrangements you plan to ensure that they promote equality and diversity. Include this in your improvement plan	
Relations between different equality groups	
Does your assessment show that a strategy, policy or process may amount to potential adverse impact between different equality groups? If yes please explain how the improvement plan is going to tackle this issue	
Consultation responses	
Summary of replies from individuals and stakeholders consulted including any previous complaints on equality and diversity issues about the strategy, policy or process	

Summary of recommendations		
Actions	By Who	By When

Declaration

I am satisfied that a Test for Relevance has been carried out on the matter named in this Analysis and conclude that a full Equality Impact Assessment **is not required**.

Yes No

If you do not think that a full Equality Impact Assessment is required – please give your reasons:

In section 6 there was only one response of yes. However this was stating that the policy revisions are all positive and to the benefit of residents with physical disabilities.

I confirm that a full Equality Impact Assessment has been completed.

Yes No

Signature of Head of Service:	Date:

Recommendations agreed:	Yes <input type="checkbox"/> No <input type="checkbox"/>
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Signed: (Director):	EIA date: 13.02.24
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