

## Equality Impact Assessment

<b>Title of review</b>	Housing Assistance Policy 2022-2025
<b>Service</b>	Public Health and Housing Options
<b>Date of review</b>	19/12/2022
<b>Date of next review</b>	TBC
<b>Lead officer, Job Title and Service</b>	Tanya Wenham Operations Manager for Public Health and Housing Options
<b>Review team</b>	Tanya Wenham
<b>Scope of the analysis</b>	<p>As a Local Housing Authority (“LHA”), Mid Devon District Council is required to deliver the Better Care Fund (BCF) allocation locally to provide adaptations to assist disabled residents. The aims of the BCF are wider than just the delivery of the disabled facilities grant programme and therefore part one of the revised policy details assistance that can help to meet the wider objectives of the BCF, and local councils. Part two of the policy aims to reduce homelessness by providing options to help tenants remain in their current homes. The purpose of this review is to consider the equality implications of the proposed policy.</p>
<b>Beneficiaries</b>	The majority of residents in Mid Devon live in housing within the private sector. The policy focuses on services for the elderly, vulnerable, disabled and residents that are owed a housing duty. All protected characteristics are represented within the beneficiaries.
<b>Stakeholders</b>	<p>Stakeholders include:</p> <ul style="list-style-type: none"> <li>• Residents;</li> <li>• Owners/landlords of private residential premises;</li> <li>• Council Members;</li> <li>• Council staff;</li> </ul>

	<ul style="list-style-type: none"> <li>• Public services, such as the Police, Devon County Council, NHS, and the Devon and Somerset Fire &amp; Rescue Service;</li> <li>• Community and voluntary organisations.</li> </ul>
<b>Relevant data and research</b>	Foundations guidance on disabled facilities grants
<b>Access complaints</b>	None recorded
<b>Consultation</b>	Not applicable
<b>Results of consultation</b>	Not applicable
<p><b>Relevance to the duty</b> - Do your proposals contribute towards or impact on any of the aims of the duty?</p> <p>There is a potential impact that requires further exploration within this assessment.</p>	
<p><b>1. Eliminate unlawful discrimination</b> – harassment, victimisation and any other conduct prohibited by the Act;</p> <p>Availability of the assistance contained within the policy scheme is restricted to mainly benefit elderly, vulnerable and disabled residents. It has been extended to include those that are owed a housing duty. The policy will be equally and fairly applied to all those who are eligible for assistance under the policy. No potential for unlawful discrimination has been identified.</p>	
<p><b>2. Advance equality of opportunity</b> – between people who share a protected characteristic and people who do not share it by;</p> <ul style="list-style-type: none"> <li>• removing or minimising disadvantages suffered by people due to their protected characteristics;</li> <li>• meeting the needs of people with protected characteristics; and</li> <li>• encouraging people with protected characteristics to participate in public life or in other activities where their participation is low.</li> </ul> <p>Residents 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 the following protected characteristics; Age and Disability. By doing so the policy restricts funding and services available and there may be some households on low income who do not meet the qualification criteria and therefore are unable to access the funding despite still being in need. The option of a Home Improvement Loan is available to such households. This is a necessary restriction due to the amount of funding available which must be targeted on a priority basis and the funding criteria imposed by the BCF and other funding streams.</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.

Having regard to this aim, the proposed policy may have a negative impact as it favours those with a protected characteristic. As detailed above this may disadvantage households that are in need but do not meet the specified criteria.

**Equality impacts raised or identified:**

The proposed policy 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.

Protected Characteristic	Commentary	
<b>Age</b>	<b>Impact</b>	<p>Yes.</p> <p>Poor housing conditions can negatively affect the health, safety and wellbeing 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 access to assistance within in the policy can be complicated and this could be a disadvantage if an individual is unable to make contact with the relevant person.</p>
	<b>Mitigation</b>	<p>Ensure that access to the assistance is as easy as possible for the elderly.</p> <p>Provision of advice and signposting for those age groups not eligible for the scheme.</p>
<b>Gender</b>	<b>Impact</b>	<p>No.</p> <p>The means of assessing eligibility does not discriminate against gender.</p>
	<b>Mitigation</b>	<p>Not required as no impact has been identified, negative or positive.</p>
<b>Race</b>	<b>Impact</b>	<p>No.</p>

		The means of assessing eligibility does not discriminate against race.
	<b>Mitigation</b>	Not required as no impact has been identified, negative or positive.
<b>Disability</b>	<b>Impact</b>	Yes. 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.
	<b>Mitigation</b>	The impact is positive. No mitigation is required.
<b>Religion or belief</b>	<b>Impact</b>	No.  The means of assessing eligibility does not discriminate against religion or belief.
	<b>Mitigation</b>	Not required as no impact has been identified, negative or positive.
<b>Gender reassignment</b>	<b>Impact</b>	No.  The means of assessing eligibility does not discriminate against gender reassignment.
	<b>Mitigation</b>	Not required
<b>Sexual orientation</b>	<b>Impact</b>	No.  The means of assessing eligibility does not discriminate against sexual orientation.
	<b>Mitigation</b>	Not required
<b>Marriage and civil partnership (Aim 1 only)</b>	<b>Impact</b>	No.  The means of assessing eligibility does not discriminate against marriage and/or civil partnership.
	<b>Mitigation</b>	Not required
<b>Pregnancy and maternity (Aim 1 only)</b>	<b>Impact</b>	Yes.  The means of assessing eligibility does not discriminate against pregnancy or maternity. However, they may not meet the eligibility

		criteria for other reasons. In some circumstances this characteristic may be relevant when considering eligibility under certain benefit criteria
	<b>Mitigation</b>	This characteristic should be kept under review in terms of accessing the scheme and eligibility.
<b>Overall conclusions and options to be put before decision maker or to take forward to develop your service:</b>		
The policy specifically identifies some of the protected characteristics as beneficiaries of the scheme. The scheme is aimed at targeting resources as those households most in need of assistance.		
<b>Actions arising from analysis:</b>		
<b>Action</b>	<b>Officer Responsible</b>	<b>Deadline</b>
Ensure assistance can be accessed easily by elderly and disabled people.	Tanya Wenham	Ongoing
Keep the equality impact under review. In particular in relation to pregnancy and maternity.	Tanya Wenham	Ongoing

## Acceptance

Name and signature of assessing officer and date of assessment

**Name:** Simon Newcombe

**Position:** Corporate Manager, Public Health, Housing & Regulation

**Signed:**

**Date:**