

**Central  
Bedfordshire  
Council  
Priory House  
Monks Walk  
Chicksands,  
Shefford SG17 5TQ**



26 July 2016

**EXECUTIVE - Tuesday 2 August 2016**

Further to the Agenda and papers for the above meeting, previously circulated, please find attached the background paper for:-

**12. Central Bedfordshire Housing Assistance Policy**

Should you have any queries regarding the above please contact Sandra Hobbs, Committee Services Officer on Tel: 0300 300 5257.

Yours sincerely

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Central Bedfordshire Equality Impact Assessment

**The Public Sector Equality Duty**

The Equality Duty requires public bodies to have **due regard** to the need to:

- Eliminate unlawful discrimination harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it
- Foster good relations between people who share a protected characteristic and people who do not share it

**Protected Characteristics:**

- Age
- Disability
- Gender Reassignment
- Pregnancy and Maternity
- Marriage and Civil Partnership (elimination of discrimination only)
- Race
- Religion or Belief
- Sex
- Sexual Orientation

**Due Regard** means consciously thinking about the three aims of the Duty as part of the process of decision-making. For example:

- How they act as employers
- How they develop, evaluate and review policy
- How they design, deliver and evaluate services
- How they commission and procure from others

**Advancing equality of opportunity** involves considering the need to:

- Remove or minimise disadvantages suffered by people because of their protected characteristics
- Meet the needs of people with protected characteristics
- Encourage people with protected characteristics to participate in public life or in other activities where their participation is low

**Fostering good relations** involves tackling prejudice and promoting understanding between people who share a protected characteristic and others.

**Complying with the Equality Duty may involve treating some people better** than others, as far as this is allowed in discrimination law. This could mean making use of an exception or positive action provisions in order to provide a service in a way that is appropriate for people who share a protected characteristic.

**Officers should:**

**Keep an adequate record showing** that the equality duties and relevant questions have been actively considered.

**Be rigorous in both inquiring and** reporting to members the outcome of the assessment and the legal duties.

**Final approval of a proposal, can only happen after the completion of an equality impact assessment. It is unlawful to adopt a proposal contingent on an equality impact assessment**



Central Bedfordshire Equality Impact Assessment

<b>Title of the Assessment:</b>	<b>Private Sector Housing Assistance Policy</b>	<b>Date of Assessment:</b>	May 2016
<b>Responsible Officer</b>	<b>Name:</b> Nick Costin	<b>Extension Number:</b>	75219
	<b>Title:</b> Head of Housing Solutions		
	<b>Email:</b> Nick.costin@centralbedfordshire.gov.uk		

**Stage 1 - Setting out the nature of the proposal and potential outcomes.**

<b>Stage 1 – Aims and Objectives</b>	
<b>1.1</b>	<p><b>What are the objectives of the proposal under consideration?</b></p> <p>The aim of the Private Sector Housing Assistance Policy (PSHAP) is to support residents to improve their health and wellbeing by addressing problems with substandard and/or unsuitable homes that do not meet individual needs. The Housing Assistance function has a role in supporting the wider adult social care prevention agenda; specifically those aims of the Care Act 2014 to promote wellbeing, independence and prevent or delay care and support needs.</p> <p>This policy also supports the priorities of the Better Care Fund Plan for Central Bedfordshire. A key part of the plan is to promote independence, enabling people to remain in their own homes for as long as possible as well as helping to return people to their homes following a spell in hospital by providing the necessary and timely adaptations which help to reduce length of stay in hospital. This policy also provides assistance to remedy fall hazards in the home and to provide adaptations to allow safe access in and around the home.</p>
<b>1.2</b>	<p><b>Why is this being done?</b></p> <p>The Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 requires local authorities to develop a policy for providing households with financial assistance to improve their homes. Every local authority is required to adopt and publish such a policy.</p>
<b>1.3</b>	<p><b>What will be the impact on staff or customers?</b></p> <p>The policy aims to provide loans and grants to those eligible households to achieve the following priorities to improve residents' health and wellbeing:</p> <ul style="list-style-type: none"> <li>A – The safety and security of older persons and other vulnerable groups, living in their home,</li> <li>B - Reducing cases of fuel poverty,</li> <li>C - Reduction of category 1 hazards, (with associated health related benefits) &amp; major adaptations for people with disabilities (see below)</li> <li>D - Reducing the number of non decent homes, primarily with loan assistance that can be recycled</li> <li>E - Reduction of empty homes,</li> <li>F - The improvement in the thermal efficiency of the housing stock,</li> <li>G - The maximising of opportunities for external funding of all types for the benefit of meeting the above priorities.</li> </ul> <p>There is no anticipated impact on staff.</p>
<b>1.4</b>	<p><b>How does this proposal contribute or relate to other Council initiatives?</b></p> <ul style="list-style-type: none"> <li>- This policy supports the council's Medium Term vision to be 'A great place to live and work' and chiefly supports the Medium Term Plan priority; Promote health and well being and protect the vulnerable.</li> </ul>



**Central Bedfordshire Equality Impact Assessment**

- The Empty Homes Strategy aims to bring long term empty homes back into occupation. This policy intends to support the Empty Homes Strategy through the provision of loan assistance.
- Adult Social Care functions – this policy supports the aims of a number of existing functions and initiatives including:
  - Urgent Homecare and Falls Response Services (UHFRS)
  - Minor aids and adaptations
  - Better Care Fund Plan

**1.5 In which ways does the proposal support Central Bedfordshire’s legal duty to:**

- Eliminate unlawful discrimination harassment and victimisation and other conduct prohibited by the Act
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it
- Foster good relations between people who share a protected characteristic and people who do not share it

The policy explicitly states that “Central Bedfordshire Council is committed to equality and diversity and both embraces and promotes the Equality Duty. [...] This policy will contribute to ensuring that all users and potential users of services and employees are treated fairly and respectfully with regard to the protected characteristics of age, disability, gender, reassignment, marriage or civil partnership, pregnancy and maternity, race, religion, sex and sexual orientation.

The assistance set out in the policy is targeted at those made most vulnerable by poor quality or unsuitable housing. This includes people with disabilities that struggle to live independently in their home because of the physical barriers, Park Home owners that are most commonly older people that are at an increased risk of fuel poverty and older, frail people that are at most risk of falls in the home.

Poor housing conditions have a disproportionate impact on vulnerable households as they may have poorer health and access to financial resources to remedy the situation may be limited. The range of assistance advances equality of opportunity by giving those at most risk of poor/unsuitable housing financial assistance to improve their housing situation and thereby their health and wellbeing.

**1.6 Is it possible that this proposal could damage relations amongst groups of people with different protected characteristics or contribute to inequality by treating some members of the community less favourably such as people of different ages, men or women, people from black and minority ethnic communities, disabled people, carers, people with different religions or beliefs, new and expectant mothers, lesbian, gay, bisexual and transgender communities?**

No evidence that this policy could damage relations or contribute to inequality has been identified.



Central Bedfordshire Equality Impact Assessment

**Stage 2 - Consideration of national and local research, data and consultation findings in order to understand the potential impacts of the proposal.**

**Stage 2 - Consideration of Relevant Data and Consultation**

In completing this section it will be helpful to consider:

- **Publicity** – Do people know that the service exists?
- **Access** – Who is using the service? / Who should be using the service? Why aren't they?
- **Appropriateness** – Does the service meet people's needs and improve outcomes?
- **Service support needs** – Is further training and development required for employees?
- **Partnership working** – Are partners aware of and implementing equality requirements?
- **Contracts & monitoring** – Is equality built into the contract and are outcomes monitored?

2.1. Examples of relevant evidence sources are listed below. Please tick which evidence sources are being used in this assessment and provide a summary for each protected characteristic in sections 2.2 and 2.3.

**Internal desktop research**

x	Place survey / Customer satisfaction data		Demographic Profiles – Census & ONS
x	Local Needs Analysis	x	Service Monitoring / Performance Information
	Other local research		

**Third party guidance and examples**

x	National / Regional Research		Analysis of service outcomes for different groups
	Best Practice / Guidance		Benchmarking with other organisations
	Inspection Reports		

**Public consultation related activities**

x	Consultation with Service Users		Consultation with Community / Voluntary Sector
x	Consultation with Staff	x	Customer Feedback / Complaints
x	Data about the physical environment e.g. housing market, employment, education and training provision, transport, spatial planning and public spaces		

**Consulting Members, stakeholders and specialists**

	Elected Members		Expert views of stakeholders representing diverse groups
	Specialist staff / service expertise		

*Please bear in mind that whilst sections of the community will have common interests and concerns, views and issues vary within groups. E.g. women have differing needs and concerns depending on age, ethnic origin, disability etc*

**Lack of local knowledge or data is not a justification for assuming there is not a negative impact on some groups of people. Further research may be required.**

**2.2. Summary of Existing Data and Consultation Findings: - Service Delivery Considering the impact on Customers/Residents**



**Central Bedfordshire Equality Impact Assessment**

- **Age:** e.g. Under 16 yrs / 16-19 yrs / 20-29 yrs / 30-44 yrs / 45-59 yrs / 60-64 yrs / 65-74 yrs / 75+

**Older people**

Nationally, older people are disproportionately more likely to be living in poverty and suffering the associated effects of low quality and inappropriate housing. There is often a shortage of sheltered and specialised accommodation for older people and many have to wait months for an occupational therapist assessment for necessary home adaptations. Older people can live in some of the worst housing in the country, often inappropriate to their changing needs. There may be large numbers of older people living alone and in isolation. The ageing population is also having an impact on the availability of appropriate housing for older people.

The total population of Central Bedfordshire is set to increase by 22.6% between 2014 and 2031. In line with national trends the biggest rate of increase is expected in older people, with the greatest proportional growth projected for older people (Central Bedfordshire JSNA, 2016).

The vast majority of older and disabled people live in mainstream housing, with only a small percentage (c.6%) living in properties that have been specially built for older or disabled people. [\(Disabled Facilities Grant Funding via Better Care Funds – An Opportunity to Improve Outcomes, Care and Repair\)](#)

Whilst older age does not inevitably result in disability, difficulties with mobility and the activities of daily living do increase significantly with age. Older people are the main recipients of help with adaptations and therefore population ageing is the major social trend impacting on the rising demand for adaptations assistance. [\(Disabled Facilities Grant Funding via Better Care Funds – An Opportunity to Improve Outcomes, Care and Repair\)](#)

Seven million people are estimated to be under-saving for retirement which means they may find themselves living in poverty in retirement and 2.1 million Pensioners live in poverty after housing costs are taken into account, while the figure rises to 2.5 million before housing costs (DWP).

Over 65s are estimated to spend 80% of their time in the home (90% for over 85 year olds) (Help the Aged) and one million people over 65 report feeling trapped in their homes (DWP).

90% of older people live in ‘mainstream housing (Department of the Environment, Transport and the Regions) and 2.1 million households with at least one person aged over 60 (28% of this age group) are living in a non-decent home. This includes 900,000 households with someone over 75 (31% of the age group) (DCLG).

Around a quarter of a million people aged 65 and over need specially adapted accommodation because of a medical condition or disability and 130,000 of them report living in homes that do not meet their needs (DCLG).

In 2006, 63% of people aged 65 to 74 reported having a longstanding illness and 38% said a longstanding illness limited their ability to carry out daily activities. (ONS)

**Fuel poverty**

Public Health England has investigated the national pattern of excess winter deaths week-to-week over the winter months. Their analysis demonstrates that weekly peaks in excess deaths coincide with cold snaps and high circulating levels of respiratory viruses, i.e. influenza and respiratory syncytial virus.



**Central Bedfordshire Equality Impact Assessment**

The effects of cold temperatures are not felt exclusively by people living in cold homes, but most of the people in the vulnerable groups (over 65s, those living with long-term conditions or disabilities) will spend the majority of their time at home. The Marmot review 'Fair Society Healthy Lives' and the King's Fund report into health inequalities both identify warm homes as crucial to reducing the risk of death from cold temperatures, and specifically to reducing the social inequality in risk of death from the cold.

The most recent statistics available at ward level are from 2011. Overall, 9616 households or 9.2% of all households in Central Bedfordshire were estimated to be in fuel poverty. Provisional figures for 2012 suggest a drop to 7422 households (7.2%). The proportion varies substantially between areas, from over a quarter of households in Aspley and Woburn and Northill wards to less than 5% of households in more urban areas.

The second most common hazard in homes in Central Bedfordshire is Excess Cold, which is found in 7% of the private sector stock and 6% of all stock. The private rented stock, however, has a higher proportion of Excess cold hazard at 11%. Only 4% of social housing stock contains this hazard.

Excess cold has previously been the most common hazard both locally and nationally. It is likely that the various energy efficiency programmes across all sectors has reduced some category 1 Excess Cold hazards. In 2009/10 the proportion of private sector homes with category 1 Excess cold hazard was 11%, so the national improvement is reflected locally. (2013 Central Bedfordshire Council Private Sector Stock Modelling data summary report).

Park homes

At the last census (2011), almost 160,000 people were living in approximately 84,000 park homes across 2,000 sites in the UK.

<b>Census 2011</b>		
	<b>Total Number of Mobile Homes in the UK</b>	<b>Mobile Homes as a Percentage of all UK</b>
Total number of people	160,000	0.3%
Total number of households	90,000	0.3%
Total number of dwellings	112,000	0.4%

  

<b>Berkeley Hanover Consulting (2002) Study for the Office of the Deputy Prime Minister</b>		
	<b>Park Homes</b>	<b>All of the UK</b>
Proportion of households that are elderly	48%	33%
Proportion of households with children	4%	29%
Average Monthly Incomes	£600	£1,800
Proportion of households with savings	81%	65%
Households with savings less than £1,500	45%	58%

The Economics of the Park Homes Industry (2002) study estimated that there were some 69,000 households residing in park homes in England and Wales, representing a population of approximately 114,000 adults and 2,400 children. The social profile of park home households is quite distinct. Sixty-eight percent are elderly (48% elderly couples), compared with 33% of households in the UK. Only 4% of park home households have children living with them compared to 29% in the population. The dominance of the elderly has increased significantly since 1990 when it stood at 55%.

Locally, a key characteristic of park homes is the age profile of its residents, with the majority of park homes occupied by older people. 80.2% of residents in park homes who responded to a Central Bedfordshire needs analysis survey in 2014 were over 65 years old. The age breakdown of the survey respondents are provided below:



**Central Bedfordshire Equality Impact Assessment**

Age	
Under 16	-
16-19	-
20-29	-
30-44	0.7%
45-59	9.5%
60-64	9.5%
65-74	43%
75+	37.2%

Delayed discharge from hospital

Delayed hospital discharge is where patients are well enough to leave hospital but are not able to because alternative care arrangements or transport are not available or easily accessible.

Barriers to achieving timely discharge from hospital are mainly associated with patients over the age of 65, not least because they are more likely to have complex medical needs, including more after-care needs. The longstanding separation between health and social care services in the UK, and limited capacity to deal with some (or many) older patients' multiple and complex needs, has contributed to this problem.

Staying in hospital for unnecessary amounts of time increases the risk of infection, depression and loss of independence.

[Hospital discharge: the patient, carer and doctor perspective, BMA Patient Liaison Group, 2014](#)

Falls

Falls are the second leading cause of accidental or unintentional injury deaths worldwide. Adults older than 65 suffer the greatest number of fatal falls (World Health Organisation).

The most common hazard found in Central Bedfordshire private sector stock are fall hazards (all types), with 8% of the private housing stock and 7% of all housing stock containing a category 1 fall hazard (2013 Central Bedfordshire Council Private Sector Stock Modelling data summary report).

**Children and young people**

The relationship between poor housing conditions and bad health is well documented. Poor conditions such as overcrowding, damp, indoor pollutants and cold have all been shown to be associated with physical illnesses including eczema, hypothermia and heart disease. Physical features of housing can also affect mental health, as families struggle to cope with the stress of living in poor conditions. Studies have shown that coping with damp, problems with keeping the house warm, noise and a poor state of repair are associated with higher levels of anxiety and depression. Given the disproportionate increase in families living in the private rented sector, the impact of poor conditions on children is particularly concerning. Children living in bad housing are more likely to have wheezing problems and poorer general health (Shelter).

Shelter research also suggests that children living in overcrowded and insecure housing, where conditions are poor, are more likely to have mental health problems such as anxiety and depression, are more likely to contract meningitis and to have respiratory problems. Poor conditions can also affect children's physical, educational and social development because of the lack of safe, comfortable space to play and study; the effects of poor conditions on sleep; illness



**Central Bedfordshire Equality Impact Assessment**

leading to absence from school; and the embarrassment of inviting friends home to play (Shelter).

There is a growing number of disabled children and younger adults whose health and lives are significantly improved through home adaptations. Home adaptations can make or break the capacity of parents to look after disabled children at home. ([Disabled Facilities Grant Funding via Better Care Funds – An Opportunity to Improve Outcomes, Care and Repair](#))

Consultation responses

Question - The council considers the following to be the key private sector housing issues that need to be addressed in Central Bedfordshire. In times of budget pressure grant/loan assistance will be prioritised taking into account the date of application but also the following priorities:

- A - The safety and security of older persons and other vulnerable groups, living in their home.
- B - Reducing cases of fuel poverty,
- C - Reduction of category 1 hazards and major adaptations for people with disabilities,
- D - Reduction of empty homes,
- F - Improvement in the thermal efficiency of the housing stock,
- G - Maximising opportunities for external funding of all types for the benefit of meeting the above priorities

Do you agree with the priorities and approach?

	30 - 44 yrs	45 - 59 yrs	60 - 64 yrs	65 - 74 yrs	75 +
Agree	71.43%	73.33%	100.00%	81.82%	100.00%
Disagree	28.57%	20.00%	0.00%	18.18%	0.00%
Don't know	0.00%	6.67%	0.00%	0.00%	0.00%

Those aged 59 and under were least in agreement with the priorities.

Those aged 59 and under made the following comments:

1. B & F are effectively the same thing. If you apply F then B will follow. There is no mention in here of those living with long term chronic conditions or those with social care needs as well as health care needs
2. but, this Executive Summary is missing a bullet point "E" and fails to mention the "Reducing Non-Decent homes" category mentioned in 4.2.1
3. I think priorities C, D, and E are the highest priority issues
4. Need to update council housing not private
5. Reduction of empty homes seems very low on the list.
6. Under C. If the adaption means that disabled people will not receive their full benefits, then I'm questioning this point as it more 'disabling' in the long run and might be 'cheaper' for the person to carry out the repairs than losing benefits.

Those aged 60 and over made the following comments:

1. F should be second item. Particularly for Park Homes where the energy companies will do nothing and supply nothing. They will only deal with brick built properties whereas the insulation in Park Homes is totally inadequate and needs to be a Council Priority.
2. In order to bring properties up to a reasonable standard & make them thermally efficient, this can often only be carried out while they are empty. If this is the case & a landlord is prepared to modernise & upgrade, then the property should be exempt fro
3. Landlords should not have to pay Council Tax on empty properties which are undergoing modernisation & improvements.
4. Priority order should be: C, D, B, A, F, G.



**Central Bedfordshire Equality Impact Assessment**

Question: How confident do you feel the policy deals with the poor housing conditions that affect the most vulnerable households in Central Bedfordshire?

	30 - 44 yrs	45 - 59 yrs	60 - 64 yrs	65 - 74 yrs	75 +
Confident	57%	47%	33%	71%	100%
Neither	29%	20%	33%	10%	0%
Not Confident	14%	33%	33%	19%	0%

Comments made by 30-64 year olds were:

1. Are the public aware that this assistance is available?
2. Can't see how people are going to be assessed and how do they find out that there is assistance? Is this going to be means tested? Does this mean their benefits will be cut? So much trust has been lost with the government's reassessment of disability benefits. People are struggling more than ever. If there is funding, why is it not going to the ones that need it and can't actually exist and are evicted from their homes?
3. I am aware of some social housing occupied by people who could afford to pay market rent. Hence, I am not convinced that CBC is doing the best possible job it can.
4. I do not think I know enough about the issues to comment
5. Not enough information to answer with certainty.
6. Think the Council say one thing and further down the line say another
7. Who knows about your policy's and how complex is it to apply
8. Why should people who can afford private property have access to grants.
9. Would need to know more

Comments made by 65-74 year olds were:

1. Have no information on which to base an opinion.
2. Insufficient new-build social/affordable housing & older housing stock in poor condition. Inadequate & out-of-date "Local Plan" - with consequential failure on housing land allocations.
3. Park Homes are occupied by people over age 50, normally much over this age, so they need priority for insulation grants or funding.
4. Park Homes are very poorly insulated and Energy Companies will not provide cavity wall insulation OR improve loft insulation as they do, free of charge, for conventional houses. The council needs to provide adequate Grants to replace this omission.
5. Policy is passive. Vulnerable households are particularly apathetic.
6. Private Landlords not incentivised, particularly given national changes from April 2016.

Question: Following the Park Home Offer which was adopted by Executive in March 2015, a recommendation for the review is to enhance the level of assistance to £5000 made available with a commitment that the owner will repay the Council if the property is sold within 5 years Do you agree with the recommendation to enhance the level of assistance to Park Homes (or Houseboats) with the commitment that the owner will repay the Council if the property is sold within 5 years?

	30 - 44 yrs	45 - 59 yrs	60 - 64 yrs	65 - 74 yrs	75 +
Yes	100.00%	71.43%	33.33%	95.00%	100.00%
No	0.00%	28.57%	66.67%	5.00%	0.00%

Question: Where empty home owners form an agreement with the council in terms of nomination rights and rents at affordable levels, funding will be assessed on a case by case basis, depending upon the extent that local housing needs are met.



**Central Bedfordshire Equality Impact Assessment**

Do you agree with the offer to enhance Empty Home Loan Assistance for private empty home owners who are willing to support the Council in meeting affordable housing needs?

	30 - 44 yrs	45 - 59 yrs	60 - 64 yrs	65 - 74 yrs	75 +
Yes	100%	86.67%	66.67%	77.27%	100%
No	0%	13.33%	33.33%	22.73%	0%

Those aged under 65 commented:

1. just tax them more for leaving it empty, they will soon get it occupied
2. Privately owned can self fund, arrange there own loan and pay back from rental income. Council can agree to rent on completion of work
3. This needs to be continuously monitored as private landlords don't maintain their properties on a regular basis and will put the rent up on a whim.
4. This will mean can rent and stay in an affordable houses.

Those aged 65+ commented:

1. Affordable rents do NOT meet the costs of private Landlords renovation & modernising older properties.
2. Once a property has been modernised & upgraded, after that level of expenditure, a landlord will expect a rental increase!

Question: Overall how satisfied are you with the Draft Central Bedfordshire Council Private Sector Housing Assistance Policy?

	Female	Male
Satisfied	60%	65.52%
Undecided	26.67%	27.59%
Unsatisfied	13.33%	6.90%

Female respondents gave the following comments to this question:

1. Government directive can interfere with this policy and make it very dangerous for the end user or receiver. There are so many factors that have not been taken into consideration. Also, if money has spent to make a house saver for a disabled person and the house will be sold, who will get the money back when all the adaptations will be removed?
2. Many people own their own homes but are not in a position to maintain them, it seems fair that rather than force them from these homes, in particular the elderly and severely disabled that the Council attempts to assist them. Putting such people into Council accommodation is not possible or practical.
3. There is no indication that where funding is provided to private landlords that the property will remain affordable for the duration of the loan. There is also no mention of those living with chronic long term health problems who may technically be classed as disabled but whose living conditions have a detrimental affect on their health.
4. Think the Council have not thought about all walks of life on all of the options.

Male respondents gave the following comments to this question:

1. Again it must be fairly administered, with safeguards in place to prevent unscrupulous profiteering
2. good example of a poorly prepared policy, again money down the drain
3. In addition to my comments in Q2 around the priorities. I have the following comments to make: 4.4.5 - Is it practicable to review fees annually with all other competing pressures on time. I would imagine that circumstances do not change annually to require review. Would it be more appropriate to replace this annual review with "reviewed periodically"?



**Central Bedfordshire Equality Impact Assessment**

4.6.2 - states "or reduced with funding returned to the Council". Does "the funding returned to the Council" mean that the Council will reduce funding in this area for some reason or does it instead relate to previous clients repaying grants/loans in which case it would be increased rather than decreased. 4.10.3 - I don't understand the example of the exception given in the 2nd bullet point. Appendix B - SSER, Eligibility & Conditions Summary - In the bracket containing "including Pension Credit" could you please add "and Council Tax Support" Appendix B - Discretionary DFG Loan Assistance, Eligibility & Conditions Summary - Can you please add to the end of the final sentence "and may be used to fund a proportion of the contribution determined for a Mandatory DFG".

4. Radical reform necessary. Tinkering at the edges will not deliver reform, nor remove "subsidy" - which ultimately has to be met by those paying full Council Tax.
5. too much 'council talk', and waffle jargon!!!
6. We found the Park Home Forum very informative and have attended both meetings.

Measures in draft policy to assist those disproportionately impacted by poor/unsuitable housing

The draft PSHA Policy recognises that older people are disproportionately impacted by poor quality or unsuitable housing and as a result has a range of assistance options aimed at older people such as:

**Safety, Security and Emergency Repair Grant** - A grant of up to £500 for emergency works, which can be administered quickly to remedy an urgent situation. This provides a limited safety net for those people most in need with the most immediate problems and clearly urgent/distressing circumstances. This includes older/disabled people whose homes have been broken into and left insecure.

**Home Improvement Loan Assistance** - Loan Assistance of up to £8,000 (with 10 year condition), or Loan Assistance for between £8,000 and £15 with 30 year repayment condition. This is assistance to remedy Cat 1 hazards, non decent homes (disrepair, inadequate facilities etc) and includes some provision of grant assistance of up to £5,000 to eligible clients on Park Home sites or Houseboats for repairs to the home itself.

**Affordable Warmth Assistance** - This is loan assistance that is intended to remedy fuel poverty and/or poor thermally efficient homes.

**Prevention Assistance** - Discretionary Assistance to prevent admission to a hospital or care home where such assistance is recommended by health or social care professionals as urgent. Assistance will be considered for customers at risk of being admitted to hospital or residential care where provision of an adaptation or home improvement will help prevent that admission.

**- Disability:** *e.g. Physical impairment / Sensory impairment / Mental health condition / Learning disability or difficulty / Long-standing illness or health condition / Severe disfigurement*

Disabled people are twice as likely to experience worklessness as non-disabled people and they are more likely to live in unsuitable or inaccessible housing without essential amenities. Many more homes are likely to require adaptation to make them appropriate and disabled people report delays, cost and poor quality of adaptations to housing as well as ongoing problems with maintenance.

Two thirds of people with dementia live in the community. The provision of adaptations and equipment is a key component in enabling people with dementia to live independently for longer,



**Central Bedfordshire Equality Impact Assessment**

and also to support carers.

As described above in the age section, similar to older people, disabled people are also at higher risk of fuel poverty, delayed discharge from hospital and poverty.

The vast majority of existing housing has poor access standards: government research shows that 91.5 per cent of homes are not even fully 'visitable' by disabled people (including wheelchair users) as they don't have four very basic key features that would allow adequate access.

[Briefing: Disabled Facilities Grants 2015, Habinteq.](#)

Government statistics show that there are currently more than 11 million disabled people in Great Britain. Our ageing society means that there will be an increase in the number of older disabled people as time goes on, rising from 2.3 million in 2002 to 4.6 million by 2041. The vast majority of disabled people and older people live in mainstream housing — only a very small percentage live in specialised accommodation. Some people have to live in care homes because of the lack of accessible properties. [Briefing: Disabled Facilities Grants 2015, Habinteq.](#)

Adaptations to disabled people's homes supports independent living, improves mental health and makes daily life safer.

Research by Foundations, the national body for home improvement agencies, has revealed that people who do need to move into residential care having previously adapted their home with the help of a DFG have delayed the move by four years on average compared with those who haven't had a DFG. [Measuring the benefits of home adaptations, Localgov, 2015.](#)

Consultation responses

Question: The council has agreed the following as the key private sector housing issues that need to be addressed in Central Bedfordshire. In times of budget pressure grant/loan assistance will be prioritised taking into account the date of application but also the following priorities:

A - The safety and security of older persons and other vulnerable groups, living in their home.

This

is the highest priority,

B - Reducing cases of fuel poverty,

C - Reduction of category 1 hazards and major adaptations for people with disabilities,

D - Reduction of empty homes,

F - Improvement in the thermal efficiency of the housing stock,

G - Maximising opportunities for external funding of all types for the benefit of meeting the above priorities

Do you agree with the priorities and approach?

	<b>No disability</b>	<b>Yes -disability</b>
Agree	80.00%	80.00%
Disagree	17.14%	20.00%
Don't know	2.86%	0.00%
<b>Grand Total</b>	<b>100.00%</b>	<b>100.00%</b>

Those with a disability made the following comments:

1. F should be second item. Particularly for Park Homes where the energy companies will do nothing and supply nothing. They will only deal with brick built properties whereas the insulation in Park Homes is totally inadequate and needs to be a Council Priority.



**Central Bedfordshire Equality Impact Assessment**

2. Priority order should be: C, D, B, A, F, G.

A respondent that did not declare a disability made the following comment relating to disability: "Under C. If the adaption means that disabled people will not receive their full benefits, then I'm questioning this point as it more 'disabling' in the long run and might be 'cheaper' for the person to carry out the repairs than losing benefits."

Question: Following the Park Home Offer which was adopted by Executive in March 2015, a recommendation for the review is to enhance the level of assistance to £5000 made available with a commitment that the owner will repay the Council if the property is sold within 5 years Do you agree with the recommendation to enhance the level of assistance to Park Homes (or Houseboats) with the commitment that the owner will repay the Council if the property is sold within 5 years?

	No disability	Yes - disability
Yes	83.87%	90.00%
No	16.13%	10.00%

Question: Where empty home owners form an agreement with the council in terms of nomination rights and rents at affordable levels, funding will be assessed on a case by case basis, depending upon the extent that local housing needs are met.

Do you agree with the offer to enhance Empty Home Loan Assistance for private empty home owners who are willing to support the Council in meeting affordable housing needs?

	No disability	Yes - disability
Yes	79.41%	100.00%
No	20.59%	0.00%

Question: Disabled facilities grants (DFGs) are grants provided by your local authority to help meet the cost of adapting a property for the needs of an eligible disabled person. There are two ways this can be provided via Disabled Facilities Grant (mandatory) or Disabled Facilities - discretionary/top up loan assistance in certain instances.

The Council proposes that the discretionary loan assistance will continue to only be available for owner occupiers and may be available for DFG applicants that require works costing more than the £30,000 DFG limit or applicants that have fallen outside the DFG eligibility but are assessed as having no (or a small) contribution under Adult Social Care's "Fairer Charging" assessment Do you agree with the approach?

	No disability	Yes - disability
Yes	64.71%	90.00%
No	14.71%	10.00%
Don't Know	20.59%	0.00%

Respondents with a disability said:

1. Any help that will assist disabled people to stay in their own home is worth the cost. i.e. Our Home is in need of Wall Installation to keep the heat in ( as we live in a Park Home).
2. Priority should be applied to persons living alone.
3. This is littered with JARGON,very difficult to understand what your trying to say...make it simple.
4. whilst agreeing with this point, the council needs to speed up the process of awarding DFGs, it currently takes several months for these to be approved causing a long delay before adaptations can begin, people who need these adaptations need them now not 6+



**Central Bedfordshire Equality Impact Assessment**

months time, this can result in people having to remain in hospital 'bed blocking' whilst awaiting essential alterations to their home to allow them to be discharged.

Question: Overall how satisfied are you with the Draft Central Bedfordshire Council Private Sector Housing Assistance Policy?

	No disability	Yes - disability
Satisfied	62.86%	80.00%
Undecided	28.57%	20.00%
Unsatisfied	8.57%	0.00%

Measures in draft policy to assist those disproportionately impacted by poor/unsuitable housing

The draft PSHA Policy recognises that disabled people are disproportionately impacted by poor quality or unsuitable housing and as a result has a range of assistance options aimed at those with disabilities such as:

**Safety, Security and Emergency Repair Grant** - A grant of up to £500 for emergency works, which can be administered quickly to remedy an urgent situation. This provides a limited safety net for those people most in need with the most immediate problems and clearly urgent/distressing circumstances. This includes older/disabled people whose homes have been broken into and left insecure.

**Home Improvement Loan Assistance** - Loan Assistance of up to £8,000 (with 10 year condition), or Loan Assistance for between £8,000 and £15 with 30 year repayment condition. This is assistance to remedy Cat 1 hazards, non decent homes (disrepair, inadequate facilities etc) and includes some provision of grant assistance of up to £5,000 to eligible clients on Park Home sites or Houseboats for repairs to the home itself.

**Affordable Warmth Assistance** - This is loan assistance that is intended to remedy fuel poverty and/or poor thermally efficient homes.

**Home Loan Support Assistance** - A loan of up to £3,000 to assist clients to obtain private funding for eligible works. Eligible works will be those necessary to carry out essential work which otherwise cannot be funded through Home Improvement Assistance, or (in exceptional cases) works to adapt a property for the needs of a disabled person where DFG is not available. a 10 year repayment condition applies.

**Relocation Assistance** - A loan of up to £4,000 for costs of relocating to a more suitable property. This is available in a number of situations including where the dwelling does not meet the needs of a disabled occupant, and/or where adaptation will not meet that need.

**Disabled Facilities Grant (mandatory)** - Grants of up to £30,000. A DFG is provided to adapt the home of a disabled person to meet their specific needs.

**Disabled Facilities – discretionary/top up loan assistance** - This is discretionary loan assistance to top up mandatory DFG for the provision of aids and adaptations for owner occupiers with disabilities. Loan assistance will also be considered for applicants (owner occupiers) that fall outside of the DFG eligibility but have no or small contributions assessed under the Fairer Charging regime.

**Prevention Assistance** - Discretionary Assistance to prevent admission to a hospital or care



**Central Bedfordshire Equality Impact Assessment**

home where such assistance is recommended by health or social care professionals as urgent. Assistance will be considered for customers at risk of being admitted to hospital or residential care where provision of an adaptation or home improvement will help prevent that admission.

**- Carers:** *A person of any age who provides unpaid support to family or friends who could not manage without this help due to illness, disability, mental ill-health or a substance misuse problem*

Over 2 million people become carers every year (Carers UK). Every day, another six thousand people take on a caring responsibility and 3 in 5 people will become a carer at some point in their lives.

Over 1 million people experience ill health, poverty and discrimination at work and in society because they are carers (Carers UK). 18% of carers have left a job or been unable to take one due to caring responsibilities. Caring for family or friends that are living in poor or unsuitable housing will further exacerbate this inequality.

40% of carers new to caring are not getting the right information and support to help them manage their lives (Carers UK).

Adaptations also allow informal carers to cope better and reduce the risk of breakdowns in support. [Measuring the benefits of home adaptations, Localgov, 2015.](#)

Home adaptations can make or break the capacity of parents to look after disabled children at home. [\(Disabled Facilities Grant Funding via Better Care Funds – An Opportunity to Improve Outcomes, Care and Repair\)](#)

**- Gender Reassignment:** *People who are proposing to undergo, are undergoing or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex*

No issues relating to gender reassignment have been identified.

**- Pregnancy and Maternity:** *e.g. pregnant women / women who have given birth & women who are breastfeeding (26 week time limit then protected by sex discrimination provisions)*

Children born to teenage mothers have 60% higher rates of infant mortality and are at increased risk of low birth weight, which has implications for the child's long-term health.

Teenage parents and their children are at increased risk of living in poverty. Babies born into a family in poverty are more likely to be born premature, more likely to have low birth weight and more likely to die in first year of life.

Teenage mothers are three times more likely to suffer post-natal depression than older mothers and experience poor mental health for up to three years after the birth.

Affordable warmth assistance and access to better quality private sector housing (empty homes and home improvement loan assistance) will improve the health and wellbeing of new mothers



**Central Bedfordshire Equality Impact Assessment**

and their babies.

**- Race:** *e.g. Asian or Asian British / Black or Black British / Chinese / Gypsies and Travellers / Mixed Heritage / White British / White Irish / White Other*

The larger family size in some black and minority ethnic (BAME) communities mean that overcrowding and poor housing conditions can be a particular problem. People from BAME communities are more likely than the population as a whole to live in poor quality and overcrowded housing. Black, Pakistani and Bangladeshi households are more likely to live in homes that fall below the Decent Homes Standard than white households. The cost of housing often prohibits families from being able to access the type or size of accommodation required; given the larger size of families in some BAME communities, overcrowding and poor housing conditions can be a particular problem. Councils are encouraged to consider developing a specific BAME housing strategy in those areas with a large ethnic/diverse population.

Pakistani and Bangladeshi groups stand out as having the worst health 13% for men and over 15% for women, compared to around 8% for all ethnic groups reporting “not good’ health’.

In comparison with the White British group, the White Irish, Mixed, Indian, Pakistani, Bangladeshi, Black Caribbean and Other Black groups all had higher age standardised rates of reporting LLTI or disability, while the Other White, Black African and Chinese had lower rates.

A 2004 study of Gypsy and Traveller health (with a sample of 293) found high levels of self-reported ‘poor’ health. Overall, around 30% of the sample reported ‘not good’ health, with a further 31% reporting ‘fairly good’ health and just 40% reporting ‘good health’. Whilst these are small samples, the figures diverge considerably from the overall national estimates for even the worst-off Pakistani and Bangladeshi groups.

Gypsies and Travellers experience the poorest health and educational attainment of any community. Gypsies and Travellers on Council or Registered Social landlord owned sites would not be eligible for discretionary assistance where they rent their home, but some “home owners” may be eligible for some forms of assistance, including mandatory disabled facilities grants where Occupational therapy recommends an appropriate adaptation for the client in mobile/park home.

Consultation findings

Question: The council has agreed the following as the key private sector housing issues that need to be addressed in Central Bedfordshire. In times of budget pressure grant/loan assistance will be prioritised taking into account the date of application but also the following priorities:

A - The safety and security of older persons and other vulnerable groups, living in their home.

This

is the highest priority,

B - Reducing cases of fuel poverty,

C - Reduction of category 1 hazards and major adaptations for people with disabilities,

D - Reduction of empty homes,

F - Improvement in the thermal efficiency of the housing stock,

G - Maximising opportunities for external funding of all types for the benefit of meeting the above priorities

Do you agree with the priorities and approach?



**Central Bedfordshire Equality Impact Assessment**

	<b>White: British</b>	<b>Black and minority ethnic</b>
Agree	81.40%	60.00%
Disagree	16.28%	40.00%
Don't know	2.33%	0.00%

There were five black and minority ethnic respondents. Two made the following comments:

1. Reduction of empty homes seems very low on the list.
2. Under C. If the adaption means that disabled people will not receive their full benefits, then I'm questioning this point as it more 'disabling' in the long run and might be 'cheaper' for the person to carry out the repairs than losing benefits.

Question: Where empty home owners form an agreement with the council in terms of nomination rights and rents at affordable levels, funding will be assessed on a case by case basis, depending upon the extent that local housing needs are met.

Do you agree with the offer to enhance Empty Home Loan Assistance for private empty home owners who are willing to support the Council in meeting affordable housing needs?

	<b>White: British</b>	<b>Black and minority ethnic</b>
Yes	83.33%	100.00%
No	16.67%	0.00%

**- Religion or Belief:** *e.g. Buddhist / Christian / Hindu / Jewish / Muslim / Sikh / No religion / Other*

Access to appropriate housing can be one of the ways in which some groups experience indirect discrimination – especially in relation to overcrowding among populations with high fertility due to religious and cultural restrictions on contraceptive use. Certain faith groups tend to have larger families and therefore require larger dwellings. They often live in poorer quality overcrowded housing which has a negative impact on health on educational attainment. The issue concerning assistance for overcrowding is discussed above and needs to be reviewed.

The draft policy is moving away from a “grant” culture towards one of providing loans, albeit zero interest, lifetime type loans. In developing and implementing the policy the Council will have to be minded of any faith groups that may be prejudiced if the assistance is perceived as a commercial type loan.

**- Sex:** *e.g. Women / Girls / Men / Boys*

Women are more likely to live in social housing – due to factors such as lower wages and restricted employment opportunities – therefore they are more likely to experience the effects of poor quality, inaccessible housing and lack of choice over location for themselves and their families. Many women live alone with the proportion increasing, as they get older. Older women living alone are more likely to be living in poverty and provision of appropriate shared accommodation might be financially and socially beneficial for some groups.

Age Concern estimates that at least 1.7 million single older men could be living in isolation in the UK. Nearly 400,000 of these are single older men aged 75 and over. Furthermore, it is estimated that 289,000 single older men are living in poverty.



**Central Bedfordshire Equality Impact Assessment**

Consultation results

Question: The council has agreed the following as the key private sector housing issues that need to be addressed in Central Bedfordshire. In times of budget pressure grant/loan assistance will be prioritised taking into account the date of application but also the following priorities:

A - The safety and security of older persons and other vulnerable groups, living in their home.

This

is the highest priority,

B - Reducing cases of fuel poverty,

C - Reduction of category 1 hazards and major adaptations for people with disabilities,

D - Reduction of empty homes,

F - Improvement in the thermal efficiency of the housing stock,

G - Maximising opportunities for external funding of all types for the benefit of meeting the above priorities

Do you agree with the priorities and approach?

	Female	Male
Agree	73.33%	79.31%
Disagree	26.67%	17.24%
Don't know	0.00%	3.45%

Women made the following comments:

1. B & F are effectively the same thing. If you apply F then B will follow. There is no mention in here of those living with long term chronic conditions or those with social care needs as well as health care needs
2. I think priorities C, D, and E are the highest priority issues
3. Need to update council housing not private
4. Under C. If the adaption means that disabled people will not receive their full benefits, then I'm questioning this point as it more 'disabling' in the long run and might be 'cheaper' for the person to carry out the repairs than losing benefits.

Men made the following comments:

1. but, this Executive Summary is missing a bullet point "E" and fails to mention the "Reducing Non-Decent homes" category mentioned in 4.2.1
2. F should be second item. Particularly for Park Homes where the energy companies will do nothing and supply nothing. They will only deal with brick built properties whereas the insulation in Park Homes is totally inadequate and needs to be a Council Priorities.
3. In order to bring properties up to a reasonable standard & make them thermally efficient, this can often only be carried out while they are empty. If this is the case & a landlord is prepared to modernise & upgrade, then the property should be exempt fro
4. Landlords should not have to pay Council Tax on empty properties which are undergoing modernisation & improvements.
5. Priority order should be: C, D, B, A, F, G.
6. Reduction of empty homes seems very low on the list.

How confident do you feel the policy deals with the poor housing conditions that affect the most vulnerable households in Central Bedfordshire?

	Female	Male
Confident	47%	61%
Neither	27%	14%
Not Confident	27%	25%



**Central Bedfordshire Equality Impact Assessment**

Female respondents that did not feel confident made the following comments:

1. Are the public aware that this assistance is available?
2. Can't see how people are going to be assessed and how do they find out that there is assistance? Is this going to be means tested? Does this mean their benefits will be cut? So much trust has been lost with the government's reassessment of disability benefits. People are struggling more than ever. If there is funding, why is it not going to the ones that need it and can't actually exist and are evicted from their homes?
3. I do not think I know enough about the issues to comment
4. Sounds good, not sure how much funding is in place to fulfil the policy
5. Think the Council say one thing and further down the line say another
6. Why should people who can afford private property have access to grants.
7. Would need to know more

Male respondents that did not feel confident made the following comments:

1. I am aware of some social housing occupied by people who could afford to pay market rent. Hence, I am not convinced that CBC is doing the best possible job it can.
2. Insufficient new-build social/affordable housing & older housing stock in poor condition. Inadequate & out-of-date "Local Plan" - with consequential failure on housing land allocations.
3. Not enough information to answer with certainty.
4. Park Homes are occupied by people over age 50, normally much over this age, so they need priority for insulation grants or funding.
5. Park Homes are very poorly insulated and Energy Companies will not provide cavity wall insulation OR improve loft insulation as they do, free of charge, for conventional houses. The council needs to provide adequate Grants to replace this omission.
6. Policy is passive. Vulnerable households are particularly apathetic.
7. Private Landlords not incentivised, particularly given national changes from April 2016.
8. Who knows about your policy's and how complex is it to apply

Overall how satisfied are you with the Draft Central Bedfordshire Council Private Sector Housing Assistance Policy?

	Female	Male
Satisfied	60.00%	65.52%
Undecided	26.67%	27.59%
Unsatisfied	13.33%	6.90%

**- Sexual Orientation:** *e.g. Lesbians / Gay men / Bisexuals / Heterosexuals*

A lack of awareness of the way discrimination impacts on these communities, particularly with regard to housing, employment, counselling, advice and health services means that these groups are not currently well-planned for in spatial terms and can be reluctant to access services which they are entitled to for fear of discrimination or breach of confidentiality.

**- Other:** *e.g. Human Rights, Poverty / Social Class / Deprivation, Looked After Children, Offenders, Cohesion, Marriage and Civil Partnership*

Poverty can lead to overcrowded and poor quality housing conditions, placement in temporary accommodation, often in disadvantaged areas where there are insufficient social facilities or



Central Bedfordshire Equality Impact Assessment

public transport levels.

**2.3. Summary of Existing Data and Consultation Findings – Employment Considering the impact on Employees**

- **Age:** e.g. 16-19 / 20-29 / 30-39 / 40-49 / 50-59 / 60+

N/A.

- **Disability:** e.g. Physical impairment / Sensory impairment / Mental health condition / Learning disability or difficulty / Long-standing illness or health condition / Severe disfigurement

- **Carers:** e.g. parent / guardian / foster carer / person caring for an adult who is a spouse, partner, civil partner, relative or person who lives at the same address

- **Gender Reassignment:** People who are proposing to undergo, are undergoing or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex

- **Pregnancy and Maternity:** e.g. Pregnancy / Compulsory maternity leave / Ordinary maternity leave / Additional maternity leave

- **Race:** e.g. Asian or Asian British / Black or Black British / Chinese / Gypsies and Travellers / Mixed Heritage / White British / White Irish / White Other

- **Religion or Belief:** e.g. Buddhist / Christian / Hindu / Jewish / Muslim / Sikh / No religion / Other

- **Sex:** Women / Men

- **Sexual Orientation:** e.g. Lesbians / Gay men / Bisexuals / Heterosexuals

- **Other:** e.g. Human Rights, Poverty / Social Class / Deprivation, Looked After Children, Offenders, Cohesion, Marriage and Civil Partnership

**2.4. To what extent are vulnerable groups more affected by this proposal compared to the population or workforce as a whole?**

The vulnerable groups that are more at risk and disproportionately affected by poor and unsuitable housing are older people, people with disabilities, children, carers and black and minority ethnic groups. The policy addresses the needs of these groups through targeted assistance and assistance available to remedy problems with the property that would most benefit these vulnerable groups.

**2.5. To what extent do current procedures and working practices address the above**



**Central Bedfordshire Equality Impact Assessment**

**issues and help to promote equality of opportunity?**

The policy's priorities are set so that the assistance benefits those most vulnerable to the impact of poor or unsuitable housing.

Those benefitting chiefly are older and disabled people because of the disproportionate affect and higher risk of these two groups living in unsuitable or poor quality housing.

Black and minority ethnic groups and young people especially will benefit from assistance that supports an increase in the supply of housing through bringing empty homes back in to use.

Families with young children will also benefit from a health and social perspective through the reduction of homes with category 1 hazards. Affordable warmth assistance will reduce the number of children living in cold, damp homes and DFGs will enable children to live at home with an increased level of independence.

Carers will be able to cope better with their caring responsibilities both physically and mentally.

Changes have been made to the policy to make access to the service fairer. The waiting list (should funds not be immediately available) is now also subject to the policy's priorities so that those most in need of assistance have a better opportunity to access the assistance available.

**2.6. Are there any gaps in data or consultation findings**

Satisfaction and access to the service data broken down by protected characteristics.

**2.7. What action will be taken to obtain this information?**

Review how demographic data is collected.

**Stage 3 - Providing an overview of impacts and potential discrimination.**

**Stage 3 – Assessing Positive & Negative Impacts**

Analysis of Impacts	Impact?		Discrimination?		Summary of impacts and reasons
	(+ve)	(- ve)	YES	NO	
<b>3.1 Age</b>	x			x	<p>Many of the types of assistance are aimed at older people because they are disproportionately affected by poor/unsuitable housing.</p> <p>Families with young children will benefit from a health and social perspective through the reduction of homes with category 1 hazards, warmer homes not affected by damp and home adaptations to allow them to live more independently.</p> <p>Younger adults in need of an</p>



Central Bedfordshire Equality Impact Assessment

					increased availability of housing will benefit.
<b>3.2 Disability</b>	x			x	Many of the types of assistance are aimed at disabled people because they are disproportionately affected by poor/unsuitable housing.
<b>3.3 Carers</b>	x			x	Carers will benefit from the cared for person having increased independence.
<b>3.4 Gender Reassignment</b>	x			x	
<b>3.5 Pregnancy &amp; Maternity</b>	x			x	
<b>3.6 Race</b>	x			x	Black and minority ethnic groups and will benefit from assistance that supports an increase in the supply of housing through bringing empty homes back in to use.
<b>3.7 Religion / Belief</b>	x			x	
<b>3.8 Sex</b>	x			x	
<b>3.9 Sexual Orientation</b>	x			x	
<b>3.10 Other e.g. Human Rights, Poverty / Social Class / Deprivation, Looked After Children, Offenders, Cohesion Marriage and Civil Partnership</b>	x			x	Those on low incomes are more likely to live in poor quality housing and the assistance will give these people the opportunity to improve the home they live in.



**Stage 4 - Identifying mitigating actions that can be taken to address adverse impacts.**

<b>Stage 4 – Conclusions, Recommendations and Action Planning</b>			
<b>4.1 What are the main conclusions and recommendations from the assessment?</b>			
<p>The assistance set out in the policy helps those vulnerable people most in need of better quality and suitable housing. The priorities are set so that those most in need of immediate assistance are supported first.</p> <p>Changes have been made to the policy to make access to the service fairer. The waiting list (should funds not be immediately available) is now also subject to the policy’s priorities so that those most in need of assistance have a better opportunity to access the assistance available.</p> <p>It is recommended that the satisfaction and access to the service data is collected in such a way that the information can be broken down by protected characteristics.</p>			
<b>4.2 What changes will be made to address or mitigate many adverse impacts that have been identified?</b>			
None required.			
<b>4.3 Are there any budgetary implications?</b>			
N/A			
<b>4.4 Actions to be taken to mitigate against any adverse impacts:</b>			
<b>Action</b>	<b>Lead Officer</b>	<b>Date</b>	<b>Priority</b>

**Stage 5 - Checking that all the relevant issues and mitigating actions have been identified**

<b>Stage 5 – Quality Assurance &amp; Scrutiny:</b>
<b>Checking that all the relevant issues have been identified</b>
<b>5.1 What methods have been used to gain feedback on the main issues raised in the assessment?</b>
<b>Step 1:</b> Consultation with residents, staff and other stakeholders informed the development of



**Central Bedfordshire Equality Impact Assessment**

the assessment.

**Has the Corporate Policy Advisor (Equality & Diversity) reviewed this assessment and provided feedback? Yes**

**Summary of CPA's comments:**

The EIA concludes that the revised policy will contribute to ensuring that all users and potential users of services, and employees are treated fairly and respectfully with regard to the protected characteristics of age, disability, gender, reassignment, marriage or civil partnership, pregnancy and maternity, race, religion, sex and sexual orientation. The assistance set out in the policy is targeted at those made most vulnerable by poor quality or unsuitable housing. This includes people with disabilities that struggle to live independently in their home because of physical barriers, Park Home residents that are most commonly older people that are at increased risk of fuel poverty, and older frail people that are at most risk of falls at home. Poor housing conditions have a disproportionate impact on vulnerable households as they may have poorer health and access to financial resources to remedy the situation may be limited. The range of assistance advances equality of opportunity by giving those most at risk or poor/unsuitable housing financial assistance to improve their housing situation and thereby their health and well being.

**Step 2:**

**5.2 Feedback from Central Bedfordshire Equality Forum**



**Stage 6 - Ensuring that the actual impact of proposals are monitored over time.**

<b>Stage 6 – Monitoring Future Impact</b>	
<b>6.1</b>	<b>How will implementation of the actions be monitored?</b> Equalities data is requested from customers receiving assistance.
<b>6.2</b>	<b>What sort of data will be collected and how often will it be analysed?</b> Protected characteristic data is collected from an anonymised customer feedback form and normally analysed annually.
<b>6.3</b>	<b>How often will the proposal be reviewed?</b> Annually
<b>6.4</b>	<b>Who will be responsible for this?</b> Operational Manager/Head of Service
<b>6.5</b>	<b>How have the actions from this assessment been incorporated into the proposal?</b>

**Stage 7 - Finalising the assessment.**

<b>Stage 7 – Accountability / Signing Off</b>	
<b>7.1</b>	<b>Has the lead Assistant Director/Head of Service been notified of the outcome of the assessment? Yes</b>  Name: <u>  </u> Nick Costin, Head of Service Date: 2th May 2016
<b>7.2</b>	<b>Has the Corporate Policy Adviser Equality &amp; Diversity provided confirmation that the Assessment is complete? Yes</b>  Date: 23 <sup>rd</sup> May 2016

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