

# Equality Analysis Form

The following questions will document the effect of your service or proposed policy, procedure, working practice, strategy or decision (hereafter referred to as 'policy') on equality, and demonstrate that you have paid due regard to the Public Sector Equality Duty.

## 1. RESPONSIBILITY

<b>Department</b>	Communities & Wellbeing	
<b>Service</b>	Urban Renewal	
<b>Proposed policy</b>	Adoption of Private Sector Housing Renewal Assistance Policy 2014	
<b>Date</b>		
<b>Officer responsible for the 'policy' and for completing the equality analysis</b>	<b>Name</b>	Sharon Hanbury
	<b>Post Title</b>	Urban Renewal Manager
	<b>Contact Number</b>	0161 253 6350
	<b>Signature</b>	
	<b>Date</b>	29 <sup>th</sup> May 2014
<b>Equality officer consulted</b>	<b>Name</b>	Mary Wood
	<b>Post Title</b>	Principal Officer - Equalities
	<b>Contact Number</b>	0161 253 6795
	<b>Signature</b>	 15/2014
	<b>Date</b>	30 <sup>th</sup> May 2014

## 2. AIMS

<p>What is the purpose of the policy/service and what is it intended to achieve?</p>	<p>The Private Sector Housing Renewal Assistance Policy 2014 is intended to provide the framework within which the Council's powers to provide assistance and, in particular, financial assistance, can be exercised in relation to supporting private sector householders to address poor or otherwise deficient housing conditions. It is the point of reference for such matters for officers and the public.</p> <p>This will be the latest in a sequence of versions. The first Policy was originally adopted in 2003, following the introduction of the Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 (the 2002 Order). The Policy was subsequently reviewed and updated in 2006 and 2009.</p> <p>A primary reason for rewriting the current Policy is to help to provide an improved service approach for disabled people and their families. The Policy will provide a more streamlined approach for lower cost and most common disabled adaptations. Flexibilities will be introduced to</p>
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	<p>allow wider choice and options for disabled people. For very expensive disabled adaptations it will strike a fair balance between the significant public investment in individual cases and the need to meet a wider continuing strong demand for adaptations. This balance will be achieved by the introduction of a financial loan product and by an extended grant condition period. The grant condition period will be proportionate to the level of grant assistance. The amount to be repaid upon sale of the property will reduce after the 5<sup>th</sup> anniversary of the grant and will continue to reduce as each full year passes throughout the grant condition period. This will help to ensure that the purpose for which the grant funding was provided is maintained, supporting value for money, but also will not be overly onerous for the individual grant recipient due to the reducing repayment provisions.</p> <p>The Policy, beyond disabled adaptations, will better reflect a changed capital funding position and, in so doing, help manage customer expectation. Although this will mean that financial assistance is not routinely available to deal with poor housing conditions statutory enforcement and advice and signposting will mitigate this.</p>
<p>Who are the main stakeholders?</p>	<p>Communities and Wellbeing Department  Children, Young People and Culture Department  Resources and Regulation Department  Residents and their families requiring adaptations  Private sector tenants and owner-occupiers in the Borough  Private Landlords in the borough  Urban Renewal Staff</p>

### 3. ESTABLISHING RELEVANCE TO EQUALITY

**3a. Using the drop down lists below, please advise whether the policy/service has either a positive or negative effect on any groups of people with protected equality characteristics. If you answer yes to any question, please also explain why and how that group of people will be affected.**

Protected equality characteristic	Positive effect (Yes/No)	Negative effect (Yes/No)	Explanation
Race	No	No	
Disability	Yes	Yes	<p>Mandatory Disabled Facilities Grants (DFGs) are provided via national legislation to enable disabled customers access to and safe use of essential facilities within their home.</p> <p>The Policy cannot change mandatory DFGs. However a new discretionary form of assistance has been introduced in the Policy which will provide an alternative, simpler and less bureacratic process for the majority of people who need adaptations costing less than £5000.</p> <p>The proposed introduction of financial assistance to help disabled people move to adapted or more readily adapted properties and the ability for customers to use adaptations funding in a different way will support flexibility and choice.</p> <p>The introduction of a loan tool and extended grant condition and repayment periods represents a better use of limited adaptation funding helping to maximise the number of disabled people the Council can assist. This new approach may be viewed negatively by those few individuals who receive expensive substantial adaptations to their homes as it may feel onerous to have grant conditions applied for a period of up to 20 years.</p> <p>Having regard to the above the proposed Policy supports timely</p>

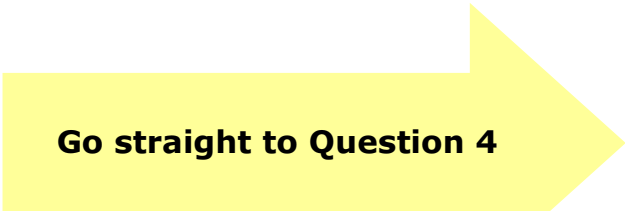
			interventions for disabled customers, reducing exposure to risk and supporting living in their own homes and independence rather than resorting to care homes, encouraging diverse and sustainable communities and potentially removing barriers to employment etc narrowing socio-economic gaps.
Gender	No	No	
Gender reassignment	No	No	
Age	Yes	No	In relation to adaptations, approximately 60% of customers are aged over 60 and this is disproportionate to the population breakdown. This is probably due to the simple correlation of ageing with disability. There is also evidence that disabled children disproportionately receive the most expensive adaptations.
Sexual orientation	No	No	
Religion or belief	Yes	No	The introduction of 'notional allowances' whereby disabled customers can choose to vary an adaptation design may assist, at no additional cost, in meeting religious or cultural design features of their home.
Caring responsibilities	Yes	No	There will be a positive impact on those with a caring responsibility in adaptation cases, reducing risk to themselves and supporting mixed communities.
Pregnancy or maternity	No	No	
Marriage or civil partnership	No	No	

**3b. Using the drop down lists below, please advise whether or not our policy/service has relevance to the Public Sector Equality Duty. If you answer yes to any question, please explain why.**

General Public Sector Equality Duties	Relevance (Yes/No)	Reason for the relevance
Need to eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010	No	
Need to advance equality of opportunity between people who share a protected characteristic and those who do not (eg. by removing or minimising disadvantages or meeting needs)	Yes	This primarily relates to the Policy's role in the delivery of major adaptations to the homes of disabled people. Not only does this promote mixed and vibrant communities it also can facilitate independence and promote participation in society.
Need to foster good relations between people who share a protected characteristic and those who do not (eg. by tackling prejudice or promoting understanding)	No	

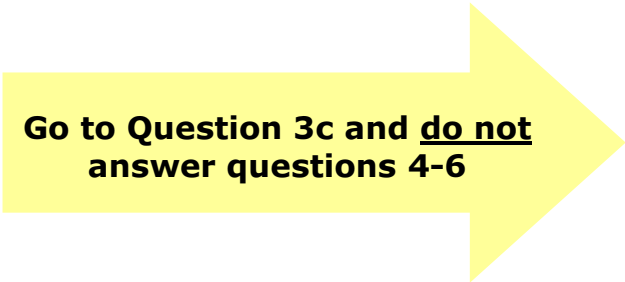
**If you answered 'YES' to any of the questions in 3a and 3b**

**Go straight to Question 4**



**If you answered 'NO' to all of the questions in 3a and 3b**

**Go to Question 3c and do not answer questions 4-6**



**3c. If you have answered 'No' to all the questions in 3a and 3b please explain why you feel that your policy/service has no relevance to equality.**

**4. EQUALITY INFORMATION AND ENGAGEMENT**

**4a.** For a service plan, please list what equality information you currently have available, **OR** for a new/changed policy or practice please list what equality information you considered and engagement you have carried out in relation to it.

Please provide a link if the information is published on the web and advise when it was last updated?

(NB. Equality information can be both qualitative and quantitative. It includes knowledge of service users, satisfaction rates, compliments and complaints, the results of surveys or other engagement activities and should be broken down by equality characteristics where relevant.)

<b>Details of the equality information or engagement</b>	<b>Internet link if published</b>	<b>Date last updated</b>
<a href="#">Customer Satisfaction Questionnaires</a>		Ongoing collection of data
<a href="#">Consultation with user led Bury Coalition for Independent Living</a>		
<a href="#">Consultation with past customers</a>		
<a href="#">Private sector stock model 2013</a>		2013
<a href="#">Adaptations Policy 2010</a>		2010
<a href="#">Regulatory Reform(Housing Assistance) (England and Wales) Order 2002</a>		
<a href="#">R (on application by BG) v Medway Council 2006</a>		
<a href="#">Housing Strategy 2014-24</a>		
<a href="#">Affordable Warmth Strategy 2011-16</a>	<a href="http://www.bury.gov.uk/CHttpHandler.ashx?id=9173&amp;p=0">http://www.bury.gov.uk/CHttpHandler.ashx?id=9173&amp;p=0</a>	

**4b.** Are there any information gaps, and if so how do you plan to tackle them?

## 5. CONCLUSIONS OF THE EQUALITY ANALYSIS

<p><b>What will the likely overall effect of your policy/service plan be on equality?</b></p>	<p>The overall effect of the policy on equality will be positive, being of particular assistance to disabled customers, older people, children and those with caring responsibilities, promoting independence, sustaining living and participating in the wider community and promoting diverse communities.</p>
<p><b>If you identified any negative effects (see questions 3a) or discrimination what measures have you put in place to remove or mitigate them?</b></p>	<p>The potential for a perceived negative effect is mitigated by a proportionate approach to grant condition periods – as the amount of financial assistance increases so does the grant condition period – and by the introduction of reducing repayments as time since completion elapses. Opportunities have been provided within the policy for grant recipients to request the waiving of repayment in certain circumstances - for example where a property is to be sold due to the physical health of the grant applicant etc. This is considered to be both a proportionate and reasonable approach. Similar principles were tested in the court case R (BG) v Medway Council 2005.</p> <p>The loan product that is proposed would not be expected to cause hardship. It is not a repayment loan but an equity share loan with safeguards built in around the loan to value ratios; and a cap on the return to the Council.</p> <p>The overall proposed policy approach in relation to loans and extended grant condition periods is also considered reasonable having regard to the enduring enhanced value of a property that has had the benefit of adaptation funding for such adaptations as bedroom/bathroom extension.</p>
<p><b>Have you identified any further ways that you can advance equality of opportunity and/or foster good relations? If so, please give details.</b></p>	
<p><b>What steps do you intend to take now in respect of the implementation of your policy/service plan?</b></p>	<p>Consideration by the Council’s Cabinet on 11<sup>th</sup> June 2014. Once the Policy is agreed public notice will be given of its adoption and it will be effective from 30<sup>th</sup> June 2014. The Policy will be available for residents to view and a summary document available. The Policy changes will need to be cascaded to all relevant staff and integrated into working practice.</p>

## 6. MONITORING AND REVIEW

**If you intend to proceed with your policy/service plan, please detail what monitoring arrangements (if appropriate) you will put in place to monitor the ongoing effects. Please also state when the policy/service plan will be reviewed.**

Performance on individual forms of assistance will be monitored quarterly. Customer Satisfaction Questionnaires analysis will be produced annually. The operating environment may change and together with customer feedback may result in amendments to the Policy. It is not anticipated that a fundamental review will be needed until at least 2017.

**COPIES OF THIS EQUALITY ANALYSIS FORM SHOULD BE ATTACHED TO ANY REPORTS/SERVICE PLANS AND ALSO SENT TO THE EQUALITY INBOX ([equality@bury.gov.uk](mailto:equality@bury.gov.uk)) FOR PUBLICATION.**