

EQUALITY IMPACT ASSESSMENT (EIA)



Title of EIA		Housing Assistance Policy – Disabled Facilities Grant
EIA Author	Name	Sheila Stirling
	Position	Service Manager
	Date of completion	03.02.22
Head of Service	Name	Sally Caren
	Position	Head of Adult Social Care and Support
Cabinet Member	Name	Cllr M Mutton
	Portfolio	Adult Services

EIA

- Having identified an EIA is required, ensure that the EIA form is completed as early as possible.
- Any advice or guidance can be obtained by contacting Jaspal Mann (Equalities), Mamta Kumar (Equalities), Alicia Philips (Health Inequalities) and Pooja Ahluwalia (Health Inequalities).

Sign Off

- Brief the relevant Head of Service/Director/Elected Member for sign off
- Have the EIA Form ready for consultation if it is required
- Amend according to consultation feedback and brief decision makers of any changes

Action

- Implement project / changes or finalise policy/strategy/contract
- Monitor equalities impact and mitigations as evidence of duty of care

PLEASE REFER TO [EIA GUIDANCE](#) FOR ADVICE ON COMPLETING THIS FORM

SECTION 1 – Context & Background

1.1 Please tick one of the following options:

This EIA is being carried out on:

- New policy / strategy
- New service
- Review of policy / strategy
- Review of service
- Commissioning
- Other project (*please give details*)

EQUALITY IMPACT ASSESSMENT (EIA)



1.2 In summary, what is the background to this EIA?

Disabled Facilities Grants (DFG) are provided to people with disability who need adaptations to their homes to enable them to continue living safely and independently. These are mandatory grants the Council is required to provide under the provisions of the Housing Grants Construction and Regeneration Act 1996 (HGCRA 1996).

The Regulatory Reform Order (RRO) and Office of the Deputy Prime Minister Circular 05/2003 require that the Council must first adopt a Housing Assistance Policy before a discretionary grant assistance can be deployed through the Disabled Facilities Grant (DFG).

The policy will enable the provision of discretionary grant assistance for eligible Coventry households by providing additional help in the form of flexible Disabled Facilities Grant (DFG) arrangements. Flexible arrangements are currently not possible under a mandatory Disabled Facilities Grant. These powers enable local housing authorities to offer their own, locally tailored financial assistance. The assistance available under the Housing Assistance Policy – Disabled Facilities Grant enables the provision of more flexible services to better meet the needs of some of Coventry's disabled residents and their families.

1.3 Who are the main stakeholders involved? Who will be affected?

Coventry's disabled residents who are eligible for mandatory DFG.

1.4 Who will be responsible for implementing the findings of this EIA?

Sally Caren- Head of Adult Social Care and Support

SECTION 2 – Consideration of Impact

Refer to guidance note for more detailed advice on completing this section.

In order to ensure that we do not discriminate in the way our activities are designed, developed and delivered, we must look at our duty to:

- Eliminate discrimination, harassment, victimisation and any other conflict that is prohibited by the Equality Act 2010
- Advance equality of opportunity between two persons who share a relevant protected characteristic and those who do not

EQUALITY IMPACT ASSESSMENT (EIA)



- Foster good relations between persons who share a relevant protected characteristic and those who do not

2.1 Baseline data and information

Please include a summary of data analysis below, using both your own service level management information and also drawing comparisons with local data where necessary (go to

<https://www.coventry.gov.uk/factsaboutcoventry>)

The current DFG arrangements are restricted to people who are disabled or frail and subject to a complex financial assessment based on income which will determine the contribution towards a grant. This may disadvantage people who are vulnerable e.g. children (because of the cost of adaptations that may exceed the grant). Parents and Carers may need to top up the grant in order to fund the completion of works. This can lead to young people not being able to access the DFG as parents can't afford the top up. Also those who become disabled as a result of accident or injury who find themselves on a limited income however the financial assessment would deem them in some circumstances as able to afford their own adaptations. It is anticipated that should the Housing assistance Policy be adopted the vulnerable groups mentioned above would have increased access to discretionary grant funding.

The DFG is available to all disabled residents of Coventry regardless of gender, ethnicity and age and all groups as defined by the Equalities Act 2010.

In 2020-21 377 citizens received a Disabled Facilities Grant. Of these 7% were aged under 18, 35% were aged 18-64 and 58% were aged 65+. Of these 67% were White British, 7% Indian, 4% White Irish, 3% Pakistani, 2% Caribbean, 2% other Asian, 1% African, 1% Bangladeshi 1% other Black background, 6% not yet obtained, 2% refused, 1% other White background and 1% other ethnic group.

As a result of the financial assessment on average 12.5% of referrals do not proceed. This data does not capture the number of disabled people, who after receiving information or advice on the financial assessment, chose not to approach the service for support

DFG Referrals received		
Year	Qty	Cancelled due to financial assessment
2018/19	415	51
2019/20	446	47
2020/21	377	55

EQUALITY IMPACT ASSESSMENT (EIA)



2.2 On the basis of evidence, complete the table below to show what the potential impact is for each of the protected groups.

- Positive impact (P),
- Negative impact (N)
- Both positive and negative impacts (PN)
- No impact (NI)
- Insufficient data (ID)

**Any impact on the Council workforce should be included under question 2.6 – not below*

Protected Characteristic	Impact type P, N, PN, NI or ID	Nature of impact and any mitigations required
Age 0-18	P	Positive Impact. The child would be enabled to live within the home environment with suitable adaptations that would meet their disability need
Age 19-64	P	Positive Impact. Enables the adult to live at home in a suitably adapted environment that meets their disability needs.
Age 65+	P	Positive Impact. Enables the adult to live at home in a suitably adapted environment that meets their disability needs.
Disability	P	Positive Impact. Enables the individual to live at home in a suitably adapted environment that meets their disability needs. Additional resources may be made available should the Housing Assistance Policy be adopted increasing the number of disabled people accessing the grant.
Gender reassignment	NI	
Marriage and Civil Partnership	NI	
Pregnancy and maternity	NI	
Race (Including: colour, nationality,	NI	

EQUALITY IMPACT ASSESSMENT (EIA)



citizenship ethnic or national origins)		
Religion and belief	NI	
Sex	NI	
Sexual orientation	NI	

HEALTH INEQUALITIES

2.3	<p>Health inequalities (HI) are unjust differences in health and wellbeing between different groups of people which arise because of the conditions in which we are born, grow, live, work and age. These conditions influence our opportunities for good health, and result in stark differences in how long we live and how many years we live in good health.</p> <p>Many issues can have an impact: income, unemployment, work conditions, education and skills, our living situation, individual characteristics and experiences, such as age, gender, disability and ethnicity</p> <p>A wide range of services can make a difference to reducing health inequalities. Whether you work with children and young people, design roads or infrastructure, support people into employment or deal with welfare benefits – policy decisions and strategies can help to reduce health inequalities</p> <p>Please answer the questions below to help identify if the area of work will have any impact on health inequalities, positive or negative.</p> <p>If you need assistance in completing this section please contact: Alicia Philips or Pooja Ahluwalia in Public Health for more information. More details and worked examples can be found at https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx</p>	
Question	Issues to consider	
2.3a What HIs exist in relation to your work / plan / strategy	<ul style="list-style-type: none"> • Explore existing data sources on the distribution of health across different population groups (<i>examples of where to find data to be included in support materials</i>) • Consider protected characteristics and different dimensions of HI such as socio-economic status or geographical deprivation 	

EQUALITY IMPACT ASSESSMENT (EIA)



	<p>Response: Disabled people living in properties which are unsuitable for their needs are more likely to experience a deterioration in their physical functional ability or mental well being. This will also have a negative impact on their independence and increases the likelihood of requiring statutory services and potentially placing pressure on carers wellbeing.</p> <p>According to the ONS Census data and Coventry's Headline Statistics, as of 2011, there were 56, 247 people with a limiting long term health problem or disability. That equates to 17.7% of residents. This client group may benefit from the implementation of the Housing Assistance Policy.</p>
<p>2.3b How might your work affect HI (positively or negatively).</p> <p>How might your work address the needs of different groups that share protected characteristics</p>	<p>Consider and answer below:</p> <ul style="list-style-type: none"> ● Think about whether outcomes vary across groups and who benefits the most and least, for example, the outcome for a woman on a low income may be different to the outcome for a woman a high income ● Consider what the unintended consequences of your work might be
	<p>Response: Having access to a Housing Assistance Policy increases the opportunity for disabled residents of Coventry to access adaptations for their property and live as independently as possible.</p> <p>There are no known unintended consequences of adopting a Housing Assistance Policy.</p> <p>a. Potential outcomes impact on specific socially excluded or vulnerable groups eg. people experiencing homelessness, prison leavers, young people leaving care, members of the armed forces community.</p> <p>The Housing Assistance Policy is focused on disabled residents of Coventry being enabled access to adaptations for their property in order for them to live as independently as possible. There are no known detrimental impacts on specific socially excluded or vulnerable groups eg. people experiencing homelessness,</p>

EQUALITY IMPACT ASSESSMENT (EIA)



prison leavers, young people leaving care, members of the armed forces community.

2.4 Next steps - What specific actions will you take to address the potential equality impacts and health inequalities identified above?

Adoption of the Housing Assistance Policy will address the inequalities described above relating to disabled individuals being enabled to access adaptations to live as independently as possible.

2.5 How will you monitor and evaluate the effect of this work?

Equalities information and impact on individuals who would access the DFG will be collected and evaluated yearly

2.6 Will there be any potential impacts on Council staff from protected groups?

No

You should only include the following data if this area of work will potentially have an impact on Council staff. This can be obtained from: Nicole.Powell@coventry.gov.uk

Headcount:

Sex:

Female	
Male	

Age:

16-24	
25-34	
35-44	
45-54	
55-64	
65+	

Disability:

Disabled	
Not Disabled	
Prefer not to state	
Unknown	

EQUALITY IMPACT ASSESSMENT (EIA)



Ethnicity:

White	
Black, Asian, Minority Ethnic	
Prefer not to state	
Unknown	

Sexual Orientation:

Heterosexual	
LGBT+	
Prefer not to state	
Unknown	

Religion:

Any other	
Buddhist	
Christian	
Hindu	
Jewish	
Muslim	
No religion	
Sikh	
Prefer not to state	
Unknown	

3.0 Completion Statement

As the appropriate Head of Service for this area, I confirm that the potential equality impact is as follows:

- No impact has been identified for one or more protected groups
- Positive impact has been identified for one or more protected groups
- Negative impact has been identified for one or more protected groups
- Both positive and negative impact has been identified for one or more protected groups

4.0 Approval

Signed: Head of Adult Social Care and Supprt Sally Caren	Date: 22/06/22
Name of Director: Pete Fahy	Date sent to Director: 15/06/2022
Name of Lead Elected Member: Councillor M Mutton	Date sent to Councillor: 15/06/2022

EQUALITY IMPACT ASSESSMENT (EIA)



Email completed EIA to equality@coventry.gov.uk