

Report Title:	DFG and Housing Assistance Policy
Contains Confidential or Exempt Information	No - Part I
Cabinet Member:	Cllr Del Campo, Cabinet Member for Adults, Health & Housing
Meeting and Date:	Cabinet – 27 <sup>th</sup> July 2023
Responsible Officer(s):	Andrew Durrant – Executive director of Place Services Emma Congerton – Housing Strategy and Inclusion Manager
Wards affected:	All

## **REPORT SUMMARY**

The new Disabled Facilities Grant & Housing Assistance Policy (DFG Policy) is being brought in to maximise the range of support we can give to disabled, and other qualifying residents, in the borough in the form of grants to adapt their homes to enable them to live more independently and improve their quality of life. The policy introduces a £30k discretionary grant in addition to the £30k mandatory grant where it is identified that this will provide the best outcome for the applicant. The Policy will also bring in the required ability to award relocation grants, housing repair grants and palliative care works. It also specifies how cases will be prioritised and introduces a panel process for requesting funding beyond the £60k mandatory and discretionary grant limits, with the panel considering whether additional funding can be provided from outside of the DFG budget, from panel board members. Representatives of the panel will include Optalis, Achieving for Children, Public Health, Registered Providers and Housing. Finally, the policy outlines the Council's plans to include an internal or external Home Improvement Agency, allowing us to charge fees that will assist with funding the resources required for the service.

This report seeks permission to go out to a 12-week public consultation to ensure that residents' and stakeholder views can be considered, followed by delegated authority to adopt the final policy, once updated following consultation.

The Disabled Facilities Grant and Housing Assistance Policy has been reviewed by Foundations, the national supporting body for the administration of Disabled Facilities Grants and is currently being reviewed by external Counsel. The Policy will be amended in line with Counsel recommendations once returned.

The adoption of the DFG & Housing Assistance Policy will support the Corporate Plan approach, to 'promote health and wellbeing, and focus on reducing inequalities, across all areas.

The DFG and Housing Assistance Policy has recently been for review by Counsel and is currently being updated in accordance with the recommendations.

## 1. DETAILS OF RECOMMENDATION(S)

**RECOMMENDATION:** That Cabinet notes the report and:

- i) **Delegates authority to the Executive Director of Place in consultation with the relevant Cabinet Member to take the Housing Allocations Policy through a public consultation process and to adopt the final version of the Policy.**
- ii) **Delegates authority to the Executive Director of Place in consultation with the relevant Cabinet Member to approve updates to the policy prior to publishing for consultation.**

## 2. REASON(S) FOR RECOMMENDATION(S) AND OPTIONS CONSIDERED

### Options

**Table 1: Options arising from this report**

<b>Option</b>	<b>Comments</b>
To take the DFG Policy out to public consultation, update following the consultation process and then to adopt the final policy in the autumn.  <b>This is the recommended option</b>	This will enable key stakeholders and members of the public to share their views on the proposed changes to the DFG Policy.
To implement the DFG and Housing Assistance Policy without first going out to public consultation.  <b>This is not recommended</b>	This is not recommended. Some of the changes in the DFG Policy are significant and will impact on both stakeholders and members of the public and they should be able to share their views before the final copy is adopted
Do Nothing	Our current DFG Policy does not allow us to make use of the full range of grants available to support disabled residents. Only implementing the policy allows us to take a more flexible approach to awarding grants to households in need.

- 2.1 Implementing a new DFG Policy will enable us to award grants higher than the mandatory £30k limit and assist more households in need of extensive adaptations to enable them to live independently at home. It will also set out under what circumstances we may approve grants higher than the £30k limit and how cases will be prioritised.

### 3. FINANCIAL DETAILS / VALUE FOR MONEY

- 3.1 Implementation of the DFG Policy will enable us to pay a higher level of grants to certain households in need of extensive adaptations, however this will put a higher burden on the DFG funding.

### 4. LEGAL IMPLICATIONS

- 4.1 The current £30k mandatory DFG limit means that for some required adaptations, the grant funding does not cover the cost of the works. This means that households may be left in unsuitable accommodation, which may be subject to legal challenge if the property would meet the threshold to consider the household statutorily homeless. The adoption of the new DFG Policy will minimise the risk of legal challenge.

### 5. RISK MANAGEMENT

**Table 2: Impact of risk and mitigation**

Threat or risk	Impact with no mitigations in place or if all mitigations fail	Likelihood of risk occurring with no mitigations in place.	Mitigations currently in place	Mitigations proposed	Impact of risk once all mitigations in place and working	Likelihood of risk occurring with all mitigations in place.
There is a risk of legal challenge currently because the mandatory grant limit of £30k is insufficient to enable larger adaptation works to be carried out, potentially leaving disabled residents in unsuitable accommodation	Major 3	High	Nothing	Implementation of the new DFG Policy which allows for discretionary funding on top of the mandatory limit	Minor 1	Low

### 6. POTENTIAL IMPACTS

- 6.1 Equalities. An Equality Impact Assessment is available as Appendix A.
- 6.2 There are no climate change implications as a result of the DFG Policy implementation.

## 7. CONSULTATION

- 7.1 A 12-week public consultation is planned, if approved by Cabinet. Comments will then be considered, a final copy produced, and the Policy will be adopted.

## 8. TIMETABLE FOR IMPLEMENTATION

**Table 3: Implementation timetable**

Date	Details
27 July 2023	Cabinet approves the DFG Policy going out to public consultation
7 August 2023	DFG Policy out to consultation for 12 weeks
29 October 2023	Consultation period ends
November 2023	The DFG Policy is adopted

## 9. APPENDICES

- 9.1 This report is supported by 1 appendix:

- Appendix A – Equality Impact Assessment

## 10. BACKGROUND DOCUMENTS

- 10.1 This report is supported by 1 background document:

- Draft DFG Policy

## 11. CONSULTATION

Name of consultee	Post held	Date sent	Date returned
<i>Mandatory:</i>			
Executive Leadership Team	Chief Executive, Executive Directors, s151 Officer and Deputy Monitoring Officer	20 June 2023	21 June 2023
<i>Mandatory:</i>	<i>Procurement Manager (or deputy) - if report requests approval to go to tender or award a contract</i>		
Lyn Hitchinson	Procurement Manager	N/A	
<i>Mandatory:</i>	<i>Data Protection Officer (or deputy) - if decision will result in processing of personal data; to advise on DPIA</i>		
Samantha Wootton	Data Protection Officer	N/A	
<i>Mandatory:</i>	<i>Equalities Officer – to advise on EQiA, or agree an EQiA is not required</i>		
Ellen McManus-Fry	Equalities & Engagement Officer	28 June 2023	

<i>Heads of Service (where relevant)</i>			
Tracy Hendren	Head of Housing, Environmental Health & Trading Standards	20 June 2023	21 June 2023

Confirmation relevant Cabinet Member(s) consulted Cllr Del Campo	Cabinet Member for Adults, Health and Housing
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## REPORT HISTORY

First submission

Report Author: Emma Congerton, Housing Strategy & Inclusion Manager, 01628 683628
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# Equality Impact Assessment

For support in completing this EQIA, please consult the EQIA Guidance Document or contact [equality@rbwm.gov.uk](mailto:equality@rbwm.gov.uk)

www.rbwm.gov.uk



## 1. Background Information

Title of policy/strategy/plan:	Disabled Facilities Grant and Housing Assistance Policy (DFG Policy)
Service area:	Housing
Directorate:	Place Services

### **Provide a brief explanation of the proposal:**

- What are its intended outcomes?
- Who will deliver it?
- Is it a new proposal or a change to an existing one?

To take the DFG Policy out to a six-week public consultation. The new DFG Policy allows us to make use of discretionary grant funding, as well as other changes in terms of processes.

## 2. Relevance Check

### **Is this proposal likely to directly impact people, communities or RBWM employees?**

- If No, please explain why not, including how you've considered equality issues.
- Will this proposal need a EQIA at a later stage? (for example, for a forthcoming action plan)

The proposal to go out to consultation will not affect communities, but the adoption of the DFG Policy will impact on disabled residents seeking adaptations to their homes.

If 'No', proceed to 'Sign off'. If unsure, please contact [equality@rbwm.gov.uk](mailto:equality@rbwm.gov.uk)

### 3. Evidence Gathering and Stakeholder Engagement

**Who will be affected by this proposal?**

For example, users of a particular service, residents of a geographical area, staff

Disabled residents will be affected by the adoption of the new DFG Policy.

**Among those affected by the proposal, are protected characteristics (age, sex, disability, race, religion, sexual orientation, gender reassignment, pregnancy/maternity, marriage/civil partnership) disproportionately represented?**

For example, compared to the general population do a higher proportion have disabilities?

Yes, all applicants to the DFG fund are disabled or require adaptations due to ill-health/age.

**What engagement/consultation has been undertaken or planned?**

- How has/will equality considerations be taken into account?
- Where known, what were the outcomes of this engagement?

A six-week consultation period will take place, if approved by Cabinet, prior to the final Policy being drafted.

**What sources of data and evidence have been used in this assessment?**

Please consult the Equalities Evidence Grid for relevant data. Examples of other possible sources of information are in the Guidance document.

## 4. Equality Analysis

Please detail, **using supporting evidence**:

- How the protected characteristics below might influence the needs and experiences of individuals, in relation to this proposal.
- How these characteristics might affect the impact of this proposal.

Tick positive/negative impact as appropriate. If there is no impact, or a neutral impact, state 'Not Applicable'

More information on each protected characteristic is provided in the Guidance document.

	Details and supporting evidence	Potential positive impact	Potential negative impact
Age	Residents can apply for a disabled facilities grant at any age, however older people are more likely to need certain adaptations such as level access showers and stairlifts.	Yes	
Disability	All applicants for Disabled Facilities Grant funding are disabled and require adaptations to their homes.	Yes	
Sex	Not applicable		
Race, ethnicity and religion	Not applicable		
Sexual orientation and gender reassignment	Not applicable		
Pregnancy and maternity	Not applicable		
Marriage and civil partnership	Not applicable		
Armed forces community	Not applicable		
Socio-economic considerations e.g. low income, poverty	The enhanced grant levels due to implementing discretionary grant funding will impact on those households who are on a low income and cannot afford to 'top up' their loans to have necessary adaptations completed.	Yes	



Children in care/Care leavers	Not applicable		
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## 5. Impact Assessment and Monitoring

*If you have not identified any disproportionate impacts and the questions below are not applicable, leave them blank and proceed to Sign Off.*

<p><b>What measures have been taken to ensure that groups with protected characteristics are able to benefit from this change, or are not disadvantaged by it?</b> For example, adjustments needed to accommodate the needs of a particular group</p>
<p>The adoption of the new DFG Policy will positively impact disabled residents.</p>
<p><b>Where a potential negative impact cannot be avoided, what measures have been put in place to mitigate or minimise this?</b></p> <ul style="list-style-type: none"> <li>For planned future actions, provide the name of the responsible individual and the target date for implementation.</li> </ul>
<p>N/A</p>
<p><b>How will the equality impacts identified here be monitored and reviewed in the future?</b> See guidance document for examples of appropriate stages to review an EQIA.</p>

## 6. Sign Off

<b>Completed by:</b> Emma Congerton	<b>Date:</b> 27 June 2023
<b>Approved by:</b> Tracy Hendren	<b>Date:</b> 27 June 2023

If this version of the EQIA has been reviewed and/or updated:

<b>Reviewed by:</b>	<b>Date:</b>
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