



Equality Screening Assessment (ESA)

This form must be completed to evidence what impact the proposal may have on protected groups within our community and/or workforce. Please complete with reference to the [Guidance Notes](#).

1: Proposal

Requirement	Details
Title of proposal:	Housing Assistance Policy (Private Sector Housing)
Type of proposal: <ul style="list-style-type: none">• new or change of policy,• new or change to service.	Change of policy - revised
What is the objective of this proposal?	<p>The former policy was shaped as a result of four Councils – Corby, Kettering, East and Wellingborough – coming together on the 1st of April 2021 when the unitary council was launched. Therefore, this document was a combination of their respective housing policies.</p> <p>During the last 3 years, we have identified areas of improvement within the North Northamptonshire housing policy. Mainly, the need to incorporate new and revised proposals as a response to the Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 (RRO). This document allows local authorities additional freedom in providing home adaptations and improvements in line with the needs of the local area. We have, therefore, reviewed the original policy - which was approved in March 2021 by the Council's Shadow Executive – and we have incorporated new measures and proposals.</p> <p>The purpose of the revised policy is to set out all funding available both mandatory and discretionary. It also aims to respond to rising labour costs and financial constraints faced by our residents by introducing new grants. Additionally, this policy focuses on supporting vulnerable, elderly and disabled residents by streamlining procedures to offer further</p>

Requirement	Details
	<p>flexibility, equality and inclusivity. Ultimately, the goal of the amended policy is for the applicants to remain living independently and safely at their own homes.</p> <p>For example, the revised policy – subject to approval - will:</p> <ul style="list-style-type: none"> • assist people with adapting their homes, including applicants with Dementia and Motor Neurone Disease, • increase the discretionary top-up grant from £10K to £20K, • eliminate the need for means testing for works up to a value of £5K or £8K, • remove the land charge on equipment - as they do not add any financial value to the property – and waive land charges under certain circumstances, • introduce a fast-tracking process to enable hospital discharges and terminally ill applicants, • introduce an independent panel to approve further funding over the proposed £50K combined mandatory and discretionary grants, • waive the applicant’s financial contribution up to £1K, if they have savings under £6K, • cover the cost for all extended warranties for equipment up to 5 years, • streamline applications for housing association tenants if the Landlord manages the works, • provide clarification on the complaints process, • provide clarification on the non-mandatory works, • assist with the Home Move Grant, • assist with the Home Repair Grant. <p>The Council’s approach when re-writing the policy was that we should be able to assist as many residents as possible.</p>
<p>Who will be consultation on this proposal? And when? (List all the groups / communities, including dates)</p>	<p>The main stakeholders to be consulted:</p> <ul style="list-style-type: none"> • Occupational Therapists • Housing Associations • Care & Repair • A small selection of past Disabled Facilities Grants recipients

Requirement	Details
	<ul style="list-style-type: none"> • Disabled Facilities Team (internal) • Private Sector Housing Team (internal) • Housing Directorate – Adult Social Care, Communities and Well-Being Executive and Assistant Directors (internal) <p>The above groups will be contacted by myself via e-mail, as part of the consultation.</p> <p>Council departments to be consulted:</p> <ul style="list-style-type: none"> • Legal • Finance • Carbon Management Team <p>The above groups will be contacted by myself via e-mail, after the consultation period has expired and the document has been amended accordingly.</p> <p>After discussion with CET, it has been agreed that the following group will be included in the consultation process:</p> <ul style="list-style-type: none"> • Residents <p>The above public consultation will be organised by CET via the Council's website.</p> <p>Current consultation period suggestion: 07.10.24 to 15.11.24 – although we may need to postpone the start date - to ensure ESA is fully completed - and depending on the conversation with CET, we may need to revise the duration from 6 to 5 weeks with a revised consultation period from 14.10.24 to 15.11.24.</p>

Requirement	Details
	<p>We are considering a 5-week consultation period, as we have not removed anything from the policy and all changes will have a positive impact. Also, it is reasonable to allow 5 weeks so that residents with disabilities can have the time and chance to respond, should they wish to. We will also include e-mail, postal address and telephone number as options for the feedback to be returned. This should allow more people to comment, as part of the public consultation.</p>
<p>Did the consultation highlight any impact on protected groups? (If yes, give details)</p>	<p>There has been no consultation yet.</p>
<p>What processes are in place to monitor and review the equality impact of this proposal?</p>	<p>The Council wishes to ensure that continuous effectiveness is provided on utilising available funding. Delivering the required outcomes within reasonable timescales, including streamlining processes is imperative. Most importantly though, it is essential to ensure that assistance is available to those residents in greater need. Monitoring this policy on an ongoing basis is vital for the implementation of the above criteria.</p> <p>Additionally, North Northamptonshire Council aims to promote equality whilst preventing discrimination in their capacity as an employer, service provider and purchaser of goods and services.</p> <p>This Policy shall ensure that all service users, potential users and Council's employees are treated fairly with regards to the "protected characteristics" of age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion, sex and sexual orientation, as outlined in the Equalities Act 2010. Members, employees and agents of the Council are required to promote equality and reduce discrimination, whilst maintaining good relations between all stakeholders.</p> <p>This policy has taken into consideration the varied needs of individuals within our community and will be applied in a consistent and fair manner to all potential applicants. The aim of this policy is to proactively support vulnerable, disabled and elderly applicants in relation to living independently and safely in their own homes for as long as possible.</p>

Requirement	Details
	The Council can assist applicants with completing the application either over the phone or by visiting the applicant at their property. A translator service is also available upon request. If an applicant has no access to the post office, one of our officers will collect all paper documents from the applicant's house so that their application is not unnecessarily delayed. If an applicant is unable to provide evidence of a certain item required, the Council will ensure an alternative solution can be explored so that the application can progress.
Who will approve this proposal? (Committee, PGG, CLT)	This proposal will be ultimately approved by the Executive Meeting on 16.01.25. Prior to this, it will be reviewed by EAP on 06.11.24 and P&E Scrutiny & CLT on 17.12.24.

2: Equality Consideration

In turn, consider each protected group and question whether the proposal seeks to:

- Eliminate discrimination,
- Foster good relations,
- Remove barriers,

Protected Groups	General Equality Duty Considerations	Opportunities	Impact
Look at each group in turn. Will that group be impacted differently by the proposal to other protected groups? How? Why?	<ul style="list-style-type: none"> • Use data to show who is in this group. • Consider how they are impacted by the outcomes and during the process. • Whose perspective does this need looking at from? <ul style="list-style-type: none"> • Employees • Customers • Contractors 	<ul style="list-style-type: none"> • Is there levelling up opportunities for a particular group? • Can you... <ul style="list-style-type: none"> • remove disadvantage? • improve access/support? • collect more data to be more informed? 	<ul style="list-style-type: none"> • Positive • Neutral • Negative
Age Are different age ranges impacted differently?	Disabled people of all ages can apply for a grant covered by this policy. All decisions are based on financial circumstances and adaptations required to assist applicants with their day-to-day tasks – either to return home from hospital or continue living independently and safely at their home with no need for further care and support. When the applicant is under 18 years of age, means testing is not applicable.	Means testing is not applicable on children under the age of 18, as guided by the legislation.	Positive

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		The ESA has highlighted that we do not collect information regarding someone's age when they apply for a DFG. We will explore the possibility of introducing an equality monitoring form to ensure that we capture this information, so we are more informed on who our clients are.	
Sex Is one sex impacted more than another?	N/A	We do not currently know the proportion of males and females that apply or are awarded DFGs. We will explore the possibility of introducing an equality monitoring form to ensure that we capture this information, so we are more informed on who our clients are.	Neutral
Disability Is one type of disability impacted more than others?	According to the legislation, to be eligible for a DFG a person is disabled if: <ul style="list-style-type: none"> • their sight, hearing or speech is substantially impaired, • they have a mental disorder or impairment of any kind, or • they have a substantial physical disability by illness, injury or impairment. AND that impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities.	The current maximum mandatory grant is £30K. The current policy includes a Discretionary DFG (top-up) grant of £10K. The revised policy proposes the increase of the Discretionary DFG (top-up) grant from £10K to £20K. Due to rising costs, the £30K mandatory grant is not sufficient for applicants unable to raise additional	Positive

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	<p>A long-term effect means something that has affected them or is likely to affect them for at least a year or longer. The impairment will also be considered as long-term if it is likely to affect the disabled person for the rest of their life even if this timescale may be less than a year.</p>	<p>funding. If the total cost of works exceeds £40K (£30K mandatory + £10K discretionary) and if the applicant is unable to contribute the financial difference, the project may not proceed. This proposal will, therefore, provide extra funding for those complex cases that have increased labour and materials costs.</p> <p>According to the current policy, means testing is not applicable to children applicants or applicants with passporting benefits. Furthermore, the revised policy proposes that means testing is not applicable for equipment cases up to a maximum cost of £8K. This proposal will, therefore, eliminate the requirement for paperwork/evidence submission by the applicant (bank statements etc.). It will also reduce timescales required from start to project completion (4-8 weeks).</p>	

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		<p>According to the current policy, all cases are managed via a single NNC Waiting List. On this waiting list, cases are prioritised based on the priority grading system set by the Occupational Therapist (OT) - standard, urgent or critical - and the date on the OT recommendation. The revised policy proposes the introduction of a “Fast Tracking” process – outside of the OT priority grading system (standard, urgent, critical). This will assist with hospital discharge cases, terminally ill applicants and palliative care. This proposal should minimise bureaucracy, where possible, and alternative equipment / construction solutions will be explored.</p> <p>The current policy does not cover dementia grants. The revised policy proposes the introduction of Dementia Grants over a cost of £1,000.00. These grants will be based on an initial dementia diagnosis and prior to the disease escalating to the stage when major DFG adaptations are recommended). The</p>	

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		<p>nature of this proposal is preventative and to postpone more costly adaptations, re-housing, social care whilst promoting independent and safe living.</p> <p>The current policy does not cover Motor Neurone Disease grants. The revised policy proposes the introduction of MND grants covered by a DFG £30K mandatory grant. Applicants with an early MND diagnosis can continue and will most likely chose to carry on working until no longer able to work. Applying for a DFG at this stage will most likely deem them as non-eligible for the grant through the means testing process due to their earnings. Disregarding their earnings will ensure the adaptations can be in place for when they no longer work and are unable to manage daily activities. Therefore, this proposal will enable major adaptations before the disease escalates rapidly. This can be achieved by ignoring the applicant's earnings during the means testing process</p>	

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		<p>and by eliminating the means testing for cost of works up to £5K.</p> <p>The current policy makes no provisions on non-mandatory works. The Council appreciates that there are several variables to set a fixed policy on awards for non-mandatory works. The team will, therefore, consider each case on its merits. They will liaise with the case OT before confirming the works as “reasonable and practicable” to carry out under a DFG grant. This will cover works, as listed below, which are not covered by the mandatory Disabled Facilities Grants:</p> <ul style="list-style-type: none"> • Sensory room / Safe space / Quiet space / Desk space / Education room for young people with conditions such as ADHD, Autism, Developmental Delay etc. • Creating safe play area in garden and/or fences. 	

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		<ul style="list-style-type: none"> • Formation of patios and landscaping of garden. Storage areas and charging points for wheelchairs, scooters or children's equipment. • Provision of treatment rooms. • Walkways to and from garages or scooter storage areas. • Ramps for scooter access. • Dropped kerbs and hard standings. <p>We need to ensure that we communicate these changes so that the whole community can understand them and apply accordingly. Therefore, we must ensure that we write the policy in plain English, which will assist potential applicants that are neurodiverse. In addition, we will ensure that the policy is accessible in its formatting to support those that use assistive software; for example, someone with a sight impairment that uses DRAGAN. Additionally, as the policy is a 50-page long document, we will consider how a</p>	

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		distilled version could be presented on the website. The ESA has highlighted that we do not collect specific equality monitoring information from our clients. This would help inform us who is applying and being successful or not in their applications. We will therefore explore introducing questions that capture information regarding someone's disability so that we can understand our clients more thoroughly.	
Gender Reassignment Will there be an impact on people who are trans?	N/A	N/A	Neutral
Race Are people from one ethnic group affected more than people from another?	Information on someone's race is currently not collected at part of the DFG process. We cannot conclude how many people from different ethnic groups applied or were awarded DFGs, and therefore cannot say which groups are likely to be affected from the changes from this policy.	We need to ensure that we communicate these changes so that the whole community can understand them and apply accordingly. Therefore, we must ensure that we write the policy in plain English, which will help those whose first language is not English.	Neutral

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		The ESA has highlighted that we do not know any equality information about our clients. And thus, we cannot demonstrate that we are meeting our statutory equality duties. We will therefore consider the introduction of collecting ethnicity information as part of the application process.	
Sexual Orientation Are people of one sexual orientation affected differently to people of another sexual orientation?	N/A	We do not currently collect information regarding someone's sexual orientation as part of this process. The inclusion of this question as part of the equality monitoring of the application and award process will be explored.	Neutral
Marriage & Civil Partnership Note: Applies to employment proposals only.	N/A - The revised policy does not apply to an employment proposal.	N/A	N/A
Pregnancy & Maternity Are people who are pregnant, or have a baby of 6 months old or younger, impacted by this proposal?	If a pregnant person is disabled or if their 6 months old baby or younger has a disability, they may be positively impacted by this policy, if they apply for a DFG grant. Applicants' eligibility will be confirmed subject to their financial circumstances and adaptations to their property, as recommended by an OT. However, when it comes to a young baby, we may need to ask	This policy aims to improve access, assisting people to continue living independently and safely in their property, delay care, help hospital discharge. Support will be offered to families with young disabled children and babies where a diagnosis is not formally	Positive

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	for a doctor's diagnosis of the condition before approving a grant and this may not be available due to their young age.	confirmed yet. Each case will be reviewed on its own merit based on a series of meetings between the Council, the OT, the family, their GP and other special medical support.	
Religion or Belief Does the proposal impact people differently depending on their religion or belief?	N/A	N/A	Neutral
Care Experience Does the proposal impact someone who has been in care differently to someone who has not. Please also refer to the care experience guidance notes .	N/A	Young people who leave care should have a personal advisor to provide them with support and advice in transitioning into adulthood and independent living. We trust that the personal advisor's role would also cover signposting young people to the grants covered by this policy. Nonetheless, it is appreciated that this group of people may struggle to apply for a Disabled Facilities Grant due to lack of the necessary support network. Further consideration will be given to this matter to identify any additional support we could provide to this group.	Neutral

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Health & Wellbeing 1. Health behaviours (E.g. diet, exercise, alcohol, smoking) 2. Support (E.g. community cohesion, rural isolation) 3. Socio economic (E.g. income, education). 4. Environment (E.g. green spaces, fuel poverty, housing standards).	This revised policy focuses on assisting disabled people to live independently. Its aim is to help the most vulnerable and those in greater need. Therefore, applicants' income and savings are important. All applicants are means tested, unless they are on passporting benefits or children under the age of 18.	<p>According to the current policy, there are no special provisions for applications made by housing associations tenants. The same DFG eligibility criteria and conditions apply to tenants as owner / occupiers. The revised policy aims to streamline the grant application process for housing association tenants, if the landlord makes the application and manages the works, including provision of drawings / specification for Council's approval and carrying out the works. This will have a positive change for the tenants as there will be shorter waiting times.</p> <p>Also, the current policy covers Renovation Grants (maximum grant £10K), Landlords Renovation Grants (maximum grant £10K) and Home Repair Assistance (maximum grant £5K).</p> <p>The revised policy proposes to remove all grants and replace with Home Repair Grants, maximum £15k, for eligible owner-occupied</p>	Positive

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		residents, on a means tested benefit and/or low income, to cover: <ul style="list-style-type: none"> • Prevent Category 1 hazards in a dwelling. • Provide adequate thermal insulation, improve energy efficiency and provide affordable warmth. • Replace a condemned boiler or provide central heating system where none exists. • Essential minor repairs and safety improvements. • Security work recommended by the Community Safety/Crime Prevention Officer. • Upgrade re-wirable fuse boxes / consumer units and electrical earthing. • Repair or renewal of the fabric to bring dwellings back into use – if empty for more than 3 years. 	

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		<p>According to the current policy, if the applicant has a financial contribution to make based on the results of the means test, they need to raise the necessary funds. According to the revised policy, if there is an applicant's contribution of less than £1K, and the applicant is unable to make this payment, it will be covered by a discretionary grant. The applicant's savings need to be under £6K. This will have a positive impact on those currently suffering financial hardship.</p> <p>In addition, according to the current policy and subject to eligibility, applicants are entitled to a £30K mandatory grant and a £10K discretionary grant. If the cost of works exceeds the maximum £40K grant, the applicant is required to meet the shortfall, or the works cannot progress. This would impact those that are suffering financial hardship. The revised policy proposes the introduction of an Independent Panel to review cases and approve further</p>	

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		<p>discretionary grants. These additional grants aim to cover the cost difference over the mandatory and discretionary limit – subject to evidence that the applicant is unable to raise the necessary funds.</p> <p>Additionally, the revised policy proposes the removal of the land charge on equipment, as they do not add any financial value to the property. Land charges will be also waived under certain circumstances.</p> <p>According to the current policy:</p> <ul style="list-style-type: none"> • Land charge is applied on works costing over £5K (building works and equipment) • Mandatory £30K grant: Maximum land charge £10K (from 5K to 15K) • Same terms apply on the Discretionary Grant of £10K: Maximum land charge £5K • The two grants are treated as separate awards with a total maximum land 	

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		<p>charge of £15K (10K on mandatory and £5K on discretionary)</p> <ul style="list-style-type: none"> • No land charge on tenant's applications (private Landlords or Housing Associations) <p>According to the revised policy:</p> <ul style="list-style-type: none"> • No land charge will be placed on Through Floor Lift (TFL) cases, including enabling works. • No land charge will be placed on stair-lifts. • No Land charge will be placed for any amount below £200. • No land charged will be placed for a child applicant on long-term foster placement. • Land charge will be waived due to financial hardship and/or if moving properties is to receive care from others. <p>According to the current policy, all equipment is covered by the standard 12-month warranty offered by the supplier. After the</p>	

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		<p>works have been completed, any ongoing maintenance, servicing, repairs or warranties are the responsibility of the grant recipient. The grant recipient can request a quote for extending the manufacturer's warranty (normally up to 5 years) and purchase this service at their own cost.</p> <p>According to the revised policy, all extended warranties will be covered by the grant for all equipment for 5 years. The grant will also cover the call out fees, if contacted by the applicant, including any repairs up to £500.</p>	


3: Equality Impact

Question	Response
What impact does the proposal have on the protected groups? No Impact, Positive Impact, Negative Impact or a combination? Any negative impact will result in an overall negative impact.	The proposal has an impact on people's lives and therefore will have an impact on some people with the protected characteristics. This is Positive Impact , if any of the people belonging to the protected groups are eligible for DFGs or any other grants covered by the policy. In some instances, there will be No Impact by this policy, as

Question	Response
	peoples protected characteristics are not relevant to the work covered by this document. Additionally, people's eligibility is not negatively affected due to these characteristics.
Does an Equality Impact Assessment need to be completed? (Yes, if any negative impact is found.)	No as no negative impact has been identified under the ESA. (If yes, this Equality Screening Assessment must be adjoined to the Equality Impact Assessment).
Is this document going to be published with the relevant report? If yes, include link to location.	Yes – Further advice is required by CET. TBC
Does the associated proposal meet our accessibility requirements? Writing for Inclusion Guidance	Yes

4: Ownership

Question	Response
Directorate	Regulatory Services
Service area	Place & Economy / Private Sector Housing
Lead officer's name	Elina Passari / Amy Plank
Lead officer's job title	Interim Lead for Disabled Facilities Grants / Strategic Lead for Private Sector Housing
Lead officer's email address	Elina.Passari@northnorthants.gov.uk

Question	Response
Lead officer's signature	
Date completed	26/09/2024
Confirm Lead Officer has completed Equality Impact Assessments iLearn Module.	YES – Elina Passari on 25/09/2024

Completed forms must be sent to [NNC Equalities](#)