

## Equality Impact Assessment Screening Tool

## APPENDIX B

Equality Impact Assessments help the Council to comply with its public sector duty under the Equality Act 2010 to have due regard to equality implications. EIAs also help services to be customer focussed, leading to improved service delivery and customer satisfaction.

The Council understands that whilst its equalities duty applies to all services, it is going to be more relevant to some decisions than others. We need to ensure that the detail of Equality Impact Assessments (EIAs) are proportionate to the impact of decisions on the equality duty, and that in some cases a full EIA is not necessary.

This tool assists services in determining whether plans and decisions will require a full EIA. It should be used on all new policies, projects, functions, staff restructuring, major development or planning applications, or when revising them.

Full guidance on the Council's duties and EIAs and the full EIA template is available at [Equality Impact Assessments](#).

<b>Proposal/Project/Policy Title</b>	Aids and Adaptations Policy
<b>Service Area</b>	Commissioning, Adults Care & Support
<b>Officer completing the EIA Screening Tool</b>	Mohammed Mayet, Commissioning Manager
<b>Head of Service</b>	Louise Hider-Davies, Head of Commissioning
<b>Date</b>	10/02/2022
<b>Brief Summary of the Proposal/Project/Policy</b> Include main aims, proposed outcomes, recommendations/decisions sought.	<p>There is a Mandatory Disabled Facilities Grant (DFGs) that the Council must make available to their disabled residents who meet the required qualification criteria, however this is means-tested, which means a resident's income and capital is used to determine if they qualify for the grant, and if they do, identifies any contribution they must pay towards the cost of the works carried out.</p> <p>The Aids and Adaptations Policy includes the DFGs, however also gives scope for an additional six discretionary grants that the Council can offer subject to funding and resources available at the time. Three of these additional grants are not means-tested, allowing those who would not qualify for the DFGs to receive assistance, providing they meet the disability qualifying criteria.</p> <p>The Aids and Adaptations Policy is designed to set out how the Council will enable private homeowners, Council tenants, housing association tenants and private tenants with disabilities to live as independently as possible in good quality homes that meet their needs through aids and adaptations. The policy will support residents of all ages to live independently and in turn delay the need for long-term high-cost care. The policy also supports other vulnerable groups to help them live safely at home for longer.</p>

	<p>The policy summarises what each grant is, how it will be funded, who it will help, what work can be done, whether it will be means-tested, how much funding might be available, whether there will be a charge made against a property, how to apply, and the conditions attached. It sets out how the Council will offer financial help for adapting homes in the Borough, together with the conditions and eligibility criteria associated with each type of assistance.</p> <p>The policy will allow the Council to better use the DFG funding, which has increased significantly in the last five years and each year the amount received from the Government has been more than the Council's expenditure amount. The way the Council currently use the DFG funding is very narrow in scope and the Council recognises that there is a need to significantly increase the annual delivery of grants and level of spend within the Borough.</p> <p>The policy will increase the Council's flexibility, result in more people being supported to maintain their independence for longer, be preventative for addressing long term care demands and reduce complexity, provide service users with better outcomes, be compliant with the spirit of the Better Care Fund and the Care Act 2014 and result in the Council having a streamlined process with an all-inclusive personalised care approach. It will speed up the administration and processing of grant-funded works, broaden the scope of assistance available and provide financial assistance that is not covered by mandatory funding.</p> <p>The Council also wishes to use some of the annual DFG allocation from Government to fund four specific social care capital projects which is identified as allowable within the annual grant determination letter from the Government. These projects are:</p> <ul style="list-style-type: none"> <li>• the All-Age Care Technology Service, which will support the delivery of technology which will transform services and enhance the quality of care that can be delivered.</li> <li>• Minor Adaptations in Private Sector Homes, which is currently funded from the Social Care revenue budget, but it is proposed that it will be funded by the DFG budget.</li> <li>• Handyperson Service Support, which is also fully funded from revenue, but it is proposed that £10,000 per annum should be funded by the DFG for the cost of materials.</li> <li>• Occupational Therapist Backlog Project, in which there is a waiting list of circa 500 vulnerable applications awaiting an Occupational Therapy assessment regarding eligibility for a DFG. It is proposed to procure serviced of additional therapy resources.</li> </ul> <p>A decision is sought by Cabinet to approve the new Aids and Adaptations Policy, agree the proposed additional project uses for the DFG capital allocation and delegate authority to the Commissioning Director and the Strategic Director for Adults and Childrens' in consultation with the Cabinet Member for Social Care and Health Integration to revise, prioritise or withdraw discretionary</p>
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	assistance in line with the Aids and Adaptations Policy as appropriate, considering the council's available resources and annual funding allocations.	
<b>Protected characteristic</b>	<b>Impact</b>	<b>Description</b>
<b>Age</b>	Positive impact (L)	<p>The policy will support residents of all ages to live independently and delay the need for long-term care. There is no age range, and the policy will apply to any resident, adult or child and eligibility will be subject to their disability and if applicable, a means test.</p> <p>The borough has a population of 214,107 and all residents in the borough with a disability may be able to access the scheme, however some grants are subject to a means test.</p>
<b>Disability</b>	Positive impact (L)	<p>The policy will allow the Council to designate additional grants and other services to disabled residents which exceed the mandatory Disabled Facilities Grant (DFG).</p> <p>The 2011 Census suggested that 26.9% of households within the Borough had at least one person with a long-term health problem or disability. This policy is designed to assist these households.</p> <p>The adaptation work carried out helps to restore independence, confidence and dignity to households with a disabled person.</p> <p>The processing team also record customer feedback via a 2-tier feedback process; one based on the assessment and the other based on the outcome of that assessment.</p>
<b>Gender re-assignment</b>	Not applicable (N/A)	There is lack of available data around gender-reassignment in LBB, but there are no perceived negative impacts on this protected characteristic.
<b>Marriage and civil partnership</b>	Not applicable (N/A)	There are no perceived negative impacts on this protected characteristic
<b>Pregnancy and maternity</b>	Not applicable (N/A)	<p>There are no perceived negative impacts on this protected characteristic.</p> <p>A resident's pregnancy is not considered unless it is contributing to their disability.</p>

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<b>Race</b>	Positive impact (L)	<p>There are no perceived negative impacts on this protected characteristic. The borough has a 66% Black and Minority Ethnic (BME) population, which is above the London average of 61.8%, illustrating how diverse the borough is.</p> <p>The team delivering the service therefore offers a language translation service by the language shop at the point of assessment.</p>
<b>Religion</b>	Not applicable (N/A)	There are no perceived negative impacts on this protected characteristic
<b>Sex</b>	Not applicable (N/A)	<p>There are no perceived negative impacts on this protected characteristic.</p> <p>Data is no longer recorded on sex as grants are based solely on a resident's disability and, dependent on the grant, their income and capital.</p>
<b>Sexual orientation</b>	Not applicable (N/A)	There is lack of available data around sexual orientation in LBB, but there are no perceived negative impacts on this protected characteristic.
<b>Socio-Economic Disadvantage<sup>1</sup></b>	Positive impact (L)	<p>Some grants under the Aids and Adaptations Policy are not means-tested, which means a person's income and savings are not considered when determining their eligibility for a grant.</p> <p>There are however four means-tested grants within the policy, some which by law, require a means test, which identifies any contribution to be paid towards the cost of the works. If a resident does however already receive a means tested benefit, such as Housing Benefit, they will not be further means tested and will have no contribution to make. Any work required for a child or young person of 19 years of age or younger will also be exempt from a means test.</p> <p>The policy does however set out an Adaptations Grant to support residents for up to £15,000 of works who are unable to access the Mandatory DFGs due to means test considerations, to help them remain living in their home. The Safe and Well Grant and Sensory Needs Assistance are also both not means-tested.</p>

<sup>1</sup> Socio-Economic Disadvantage is not a protected characteristic under the Equality Act. London Borough of Barking and Dagenham has chosen to include Socio-Economic Disadvantage as best practice.

		<p>The means-test is set by the Government and considers how much money a person has in addition to their allowable income. The allowable income amount is not included in the means test. The allowance income consists of the basic amount of income support and/or pension credit plus a flat rate allowance for housing costs. The means test also considers any savings a person has over £6,000.</p> <p>Although nearly half of everyone in poverty is either a disabled person or lives with a disabled person, the mean-test exemptions should result in those in poverty being exempt from being means-tested as people with no or low income would be in receipt of one of the means tested benefits, these are:</p> <ul style="list-style-type: none"> <li>• Employment and Support Allowance (Income Related)</li> <li>• Housing Benefit</li> <li>• Jobseekers' Allowance (Income Based)</li> <li>• Income Support</li> <li>• Pension Credit – Guarantee Credit element</li> <li>• Universal Credit – only if the award is more than £0.00</li> </ul> <p>The borough has the highest unemployed population in the country at 8.5% and it is reasonable to assume that most unemployed residents are receiving a means-tested benefit, thus being exempt from the means-test for DFGs purposes.</p> <p>It is possible for those on a low income, to be working and receiving Universal Credit to top-up their low income. Employed residents in receipt of Universal Credit payments are treated as in receipt of a means-tested benefit, exempting them from the DFGs means-test. The borough has a population of 8.7% of Universal Credit claimants in employment, which means employed residents on a low income with a disability could also benefit from this scheme.</p> <p>The policy allows for grants to be paid for owner-occupiers, council tenants, housing association tenants and private tenants.</p> <p>Council tenants cannot benefit from the mandatory DFGs but can apply directly to</p>
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		the Council’s Housing Department which has a parallel and equally effective system for adaptations. Council tenants can however apply for some of the additional six discretionary grants.
<p><b>How visible is this service/policy/project/proposal to the general public?</b></p>	<p>Low visibility to the general public (L)</p>	
<p><b>What is the potential risk to the Council’s reputation?</b></p> <p>Consider the following impacts – legal, financial, political, media, public perception etc</p>	<p>Medium risk to reputation (M)</p>	

If your answers are mostly H and/or M = **Full EIA to be completed**

If after completing the EIA screening process you determine that a full EIA is not relevant for this service/function/policy/project you must provide explanation and evidence below.

<p>As a result of this screening tool, no negative or high risks have been identified. It has therefore been concluded that a full EIA is not relevant for this policy.</p> <p>There is a higher risk to the Council if the Aids and Adaptations Policy is not implemented due to the means-test included within the mandatory DFG, which excludes a population of disabled residents from receiving the support they may require.</p> <p>The Aids and Adaptations Policy will delivery positive services to residents of the borough and will enable eligible disabled residents to receive the mandatory DFGs of up to £30,000, subject to a means-test.</p> <p>In addition to the mandatory DFGs, the policy enables eligible disabled residents to receive the following additional discretionary grants:</p> <ul style="list-style-type: none"> <li>• the Adaptations Grant of up to £15,000, which uses the same criteria as the mandatory DFG but is not subject to a means-test</li> <li>• the Top-Up Grant of up to £15,000 to their mandatory DFG where the initial means-tested grant is insufficient to cover the full cost of the works</li> <li>• the non-means-tested Safe &amp; Well Grant of up to £5,000 to enable property clearances and essential property repairs</li> <li>• the Relocation Grant of up to £10,000 to support residents who qualify under the mandatory DFGs to move to more suitable accommodation where it is not possible to adapt their current home</li> <li>• the non-means-tested Sensory Needs Assistance of up to £2,500 without a means-test to make homes “friendly” where the disabled person has dementia, other cognitive impairment, sensory disability or a recognised long term behavioural condition.</li> </ul>
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- The Professional Fees Grant of up to £2,500 to pay for professional fees if the works are unable to proceed and thus unable to be paid under the mandatory DFGs, but the resident qualified for a mandatory DFG.

There are also provisions in place to consider applications which exceed the maximum funding amount by virtue of the Top-Up Grant. An Adaptations Panel will be in place to approve any required funding above the maximum £15,000 limit.

The Aids and Adaptations Policy will support residents of all ages. There is no age range, and the policy will apply to any resident, adult or child.

Eligibility will be subject to the resident's disability and needs, and dependent on the grant, a means-test. The focus of the policy is on residents' disabilities and to enable residents to continue living independently at home.

There are no perceived negative impacts, only positive impacts, to the protected characteristics of the Equality Act 2010 and to the socioeconomically disadvantaged. Although some grants are means-tested, the qualifying criteria should enable socioeconomically disadvantaged residents to be eligible for support and the non-means-tested grants ensure those with higher incomes and capital can still receive the support they may need.

Feedback will be sought from residents to ensure continuous service improvement. This will be done via a 2-tier referral process, the first being feedback of the assessment itself and the second being comprehensive feedback of the outcome from the assessment.

The policy will be reviewed to ensure it is "working" and working well. Data will be stored regarding applications and the ages, tenure and ethnicity of applicants. This data can then be used to review the success of the policy and review who are benefiting from it the most.

Please submit the form to [CE-strategy@lbbd.gov.uk](mailto:CE-strategy@lbbd.gov.uk) and include the above explanation as part of the equalities comments on any subsequent related report.