

**Equality Impact Analysis Form**

**1. Equality Impact Analysis (EqIA) Form**

<b>Title of EqIA (policy/change it relates to)</b>	Private Sector Housing Assistance Policy	<b>Date</b>	22 Nov 2021
<b>Team/Department</b>	Environmental Health/Housing and Health		
<p><b>Focus of EqIA</b></p> <p>What are the aims of the new initiative?          Who implements it?          Define the user group impacted?          How will they be impacted?</p>	<p>The Policy is being revised and updated to ensure the council is utilising its powers and duties to assist in the improvement of private sector dwellings in the district while at the same time prudently directing the council’s resources to those households least able to afford to carry out essential repairs or energy efficiency improvements.</p> <p>The main objectives of the policy are; to tackle housing conditions that represent a hazard to the health and wellbeing of the occupier, focusing on the needs of the most vulnerable households. And to improve the quality of life of elderly, disabled and vulnerable residents by appropriate adaptations to their homes, where they are not in the position to do so.</p> <p>The most significant change in the policy is a move to offering decent homes loans where previously grants were offered. The loans are interest bearing, secured against the property and repayable in full on sale or transfer of the property. Smaller (up to £1000) repayable grants will also be offered where there are very serious defects to a property that require an urgent response). These smaller grants will not be interest bearing.</p> <p>The change to charging interest could have an impact on any applicant who for religious reasons feels unable to take out such a loan.</p>		

**2. Review of information, equality analysis and potential actions**

Please fill in when appropriate to the change. If it does not, please put N/A

<b>Protected characteristics groups from the Equality Act 2010</b>	<b>What do you know?</b> Summary of data about your service-users and/or staff		<b>What do people tell you?</b> Summary of service-user and/or staff feedback	<b>What does this mean?</b> Impacts (actual and potential, positive and negative. Clearly state each)	<b>What can you do?</b> All potential actions to: <ul style="list-style-type: none"> <li>• advance equality of opportunity,</li> <li>• eliminate discrimination, and</li> <li>• foster good relations</li> </ul>
<b>Age</b>	Under 20 20-24 25-29 30-44 45-59 60-64 65-74 75-84 85-89 90	24.2% 4.5% 5.5% 19.8% 22.9% 5.4% 9.6% 5.6% 1.6% 0.9%	East Herts has an ageing population. ONS population forecasts show that there will be 87.5% more older people (65+) by 2037. This potentially means a significant increase in the need for support services and housing with support which needs to be planned for.  The District Housing Needs Survey 2014 <sup>1</sup> asked a series of questions to understand physical or mental health	Greater potential for there to be more residents that would need help through Decent Homes Loans and potentially Disabled Facilities Grants. There may be a longer term need to consider the impact of an ageing population on this service.  Most clients of the service are older people and council staff is experienced in dealing with such clients. There is no evidence that they are disadvantaged or discriminated against.	Ensure that older people continue to have access to the assistance they need and that there are provisions in place to deal with a potential increase in the number of applicants.  This policy accounts for a shift from Decent Homes Grants to Loans. This means that in time the funding source will be circular and benefit more residents in the future.

<sup>1</sup> [East Hertfordshire District Council - Housing Needs Survey 2014](#)

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			issues and long term illness and their impact on housing needs. The main demographic affected by disabilities/ limiting long term illnesses were over 65 years old and the main issue being around walking/mobility issues.		
<b>Disability</b>	11,663 households in East Herts have one person in household with a long-term health problem or disability.  Disabled Facilities Grants are only available to those individuals who are registered or capable of being registered as		People with disabilities have accessed Disabled Facilities Grants for a number of years and referral pathways are well established.	Clients of the service may have a long-term health problem or a disability. Council staff and the Hertfordshire Home Improvement Agency are experienced in dealing with such clients. There is no evidence that they are disadvantaged or discriminated against.	Ensure that people with disabilities continue to have access to the assistance they need. This assistance ranges from verbal advice and referrals to other services to financial assistance provided for a number of different home adaptations.

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	<p>disabled.</p> <p>There is a nationally recognised shortage of housing for people with disabilities. 1.9 million households in England (9%) had one or more people with a long-term limiting illness or disability that required adaptations to their home<sup>1</sup>.</p>			
<b>Gender reassignment</b>	N/A			
<b>Pregnancy and maternity</b>	N/A			
<b>Race</b>	N/A			

<sup>1</sup> [Facts and Figures 2018, Disability in the United Kingdom \(Papworth Trust\)](#)

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<b>Religion or belief</b>	From census statistics the proportion of East Herts residents who gave Muslim as their religion in 2011 was 0.7%, this is up from 0.5% in 2001. The religion/beliefs of previous grant applicants is not known. Lendology – a CIC providing home improvement loans for 12 councils in the west of England have provided one Sharia compliant loan out of 2,856 total loans advanced to date.	We have considered the potential implications that religion may have on service users accepting a Decent Homes Loan.	Using standard interest bearing loans is against Sharia law and so using these alone could impact any Muslim applicants. This may be a barrier to vulnerable residents accessing the assistance that they need.	Whilst the likelihood of an applicant requiring a sharia compliant loan is low the policy will allow that should the situation occur a loan based on Ijara financing (similar to a lease will be provided either directly by East Herts or through a partner.  The eligibility criteria applied to a loan application and an Ijara application would be the same. Under the proposed scheme the only alteration would be the terms of repayment between the types of financial support.
<b>Sex/Gender</b>	N/A			
<b>Sexual orientation</b>	N/A			

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<b>Marriage and civil partnership</b>	N/A			

**Assessment of overall impacts and any further recommendations**

The assistance available is designed to meet the needs of all applicants regardless of their age, ethnicity, religion, sexual orientation, gender or disability. However, it is accepted that insufficient information is collected to make any definitive conclusions about the treatment of each equalities group. Considerations to mitigate against unequal treatment of certain groups have been outlined above.

The availability of transparent and well set out procedures will assist in demonstrating transparency of the way in which the service handles applications. It will also ensure uniformity of approach and that there is no uncertainty or lack of understanding by staff on our responsibilities towards applicants.

**3. List detailed data and/or community feedback which informed your EqIA (If applicable)**

<b>Title</b> (of data, research or engagement)	<b>Date</b>	<b>Gaps in data</b>	<b>Actions to fill these gaps: who else do you need to engage with?</b> (add these to the Action Plan below, with a timeframe)

<p>Data on the following protected characteristics were not considered to be relevant to the Private Sector Housing Assistance Policy:</p> <p>Gender reassignment, Pregnancy and maternity, Race, Sex/Gender, Sexual orientation, Marriage and civil partnership.</p>	<p>02/12/2021</p>	<p>Data on these characteristics was not found to be relevant to this Equality Impact Assessment.</p>	
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**4. Prioritised Action Plan (If applicable)**

<b>Impact identified and group(s) affected</b>	<b>Action planned</b>	<b>Expected outcome</b>	<b>Measure of success</b>	<b>Timeframe</b>
<p>NB: These actions must now be transferred to service or business plans and monitored to ensure they achieve the outcomes identified.</p>				
<p><b>Muslim or other beliefs where interest based financing is not allowed or considered non ethical</b></p>	<p><b>Continue to progress the policy based on interest bearing loans but with the option to include a Sharia compliant solution if such an applicant comes forward</b></p>	<p><b>Low expectation of the requirement for a Sharia compliant product but with the understanding of the option available this could be put in place without causing a significant delay to an application.</b></p>	<p><b>The religion/beliefs of previous grant applicants is not known. This will be addressed as required.</b></p>	<p><b>As required</b></p>
<p><b>All 9 protected characteristics as defined by Equalities Act 2010</b></p>	<p><b>All staff have had Equality Training on all strands in the last 12 months as part of mandatory training at East Herts. This should be continued to ensure that officers are informed in how to take Equality in to consideration when carrying out this work.</b></p>	<p><b>Fair treatment of service users and applicants</b></p>		<p><b>As required</b></p>



**EqIA sign-off:** (for the EQIA to be final an email must sent from the relevant people agreeing it or this section must be signed)

**Lead Equality Impact Assessment officer:** Corinne Crosbourne

**Date:** 02/12/2021

**Directorate Management Team rep or Head of Service:** Jonathan Geall

**Date:**

**Author of Equality Impact Analysis:** Jane O'Brien

**Date:** 01/12/2021