

## West Wiltshire District Council

### Equality Impact Assessment (EIA) Form - September 2007

**1. What is the name of the function, policy or service that is being assessed?**

*Private Sector Housing Renewal*

**2. What are the aims of the function, policy or service? Whose needs it is designed to meet? What are the current priorities?**

*The team*

- *Provides a statutory grant service – working with social services and a Home improvement Agency to provide adaptations for disabled people the majority of these are elderly*
- *Delivers the housing renewal and empty homes strategies – to provide assistance to improve housing conditions primarily for those who are vulnerable*
- *Maintains housing standards, in particular working with private sector landlords and tenants – the accommodation will in general be at the lower end of the market and tenants are more likely to be on low incomes and some may well not speak English as a first language. Increasingly Migrant Workers are taking homes in the private rented sector.*
- *Delivers home energy conservation objectives*
- *Licenses houses in Multiple Occupation – part of the licensing process is to inspect the houses and ensure that they meet national standards. Tenants are likely to be on low incomes and might also be migrant workers or other people who do not speak English as a first language*

*Current resources limit the extent of the service to the statutory minimum in both terms of grants and assistance and in working with the private rented sector.*

**3. In what ways might this function, policy or service affect some groups of people differently? Might some groups find it harder to access the service? Do some groups have particular needs that are not well met by the current policy or service? Please ensure that you comment against each of the dimensions listed below and where no issues are identified that you state this clearly against the relevant dimension.**

a) Age

*The majority of disabled people benefiting from disabled facilities grants are older people. On a national basis it is 70%, mainly having stair lifts or level access showers installed. This service is an important part of their independence.*

*Children's needs are the most challenging to meet. The referral for grant aid is often a step in a long process of assessing and meeting their needs, the situation may be critical in terms of the parents continuing to manage by this stage, however statutory grant aid may fail to provide a solution.*

*We have currently suspended discretionary grants, due to budgetary constraints. The purpose of these grants is mainly to improve housing conditions amongst vulnerable members of society. Building up a database of enquiries and the age would enable us to monitor the effect of this particularly on older people.*

b) Disability

*A major part of our service is disabled facilities grants. This service is specifically aimed at helping disabled people maintain their independence. The majority of these grants are for older people.*

*Children's needs are the most challenging to meet. The referral for grant aid is often a step in a long process of assessing and meeting their needs, the situation may be critical in terms of the parents continuing to manage by this stage, however statutory grant aid may fail to provide a solution.*

c) Gender

*There are no issues identified*

d) Race

*We currently do not monitor the race of the tenants or landlords of the properties that we deal with. However this would enable us to better understand the impact of HMO licensing in terms of race. There is a perception that action against landlords due to poor quality housing can lead to retribution against their tenants.*

*We have currently suspended discretionary grants, due to budgetary constraints, building up a database of enquiries and race would enable us to monitor the effect of this by race.*

e) Religion/belief

*There are no issues identified*

f) Sexual orientation

*There are no issues identified*

g) Migrant workers

*Some HMOs and housing complaints have identified houses in poor condition or overcrowded possibly being used for migrant workers. More research needs to be done to discover the extent of the problem. There is a perception*

*that action against landlord due to poor housing can lead to retribution against their tenants.*

**4. What evidence do you have for your judgement? Is there evidence of public concern (e.g. complaints)? Have staff raised concerns? Is there local or national research to suggest that there could be a problem?**

*Nationally 70% of disabled facilities grants are for older people.*

*Occupational therapists have raised concerns about children's grants.*

HMO licensing will improve housing conditions for those living in the lowest end of the private rented sector. This will have a significant benefit for black and minority ethnic tenants. The 2001 Survey of English Housing shows that 39% of black private sector tenants and 64.6% of Asian private sector tenants live in non-decent housing.

*Regulatory Impact Assessment (RIA): Houses in Multiple Occupation and Selective Licensing and Management Orders March 2006*

*Suggested that monitoring of race of tenants would be a good idea on equalities impact assessment on Housing Bill 2004.*

*Complaints have shown that migrant workers are being associated with some HMOs, however more research is needed.*

**5. How and with whom have you consulted with as part of your assessment? What were the results? Have you published the results of that consultation? If so, where?**

*We have consulted with children's occupational therapists and the local Home Improvement Agency there are no published results*

**6. If you have found that the function, policy or service might have an adverse impact on a particular group of people, can you justify this?**

*The current service may have an adverse affect on disabled children and their families by being considered only when the needs of the child have been established. A wide range of options needs to be considered early in the process so that proper time and consideration can be given to them before crisis point is reached.*

*Suspension of discretionary grants will have an adverse affect on vulnerable people specifically in this context, older people, ethnic minorities and those on low incomes. This may be their only path to get basic repairs carried out to their homes.*

*More work is needed to establish the true number of HMOs in West Wiltshire and who they house. Currently we are aware that the majority of HMO's are likely to have category 1 or 2 hazards however lack of resources mean that the extent of the problem has not been fully surveyed or appropriate enforcement action taken. This will have an adverse affect on those living in this accommodation, migrant workers and ethnic minorities will be disproportionately affected by this. Language may be a barrier to some migrant workers and ethnic minorities*

**7. If the impact cannot be justified, what do you intend to do about this? Are there changes that you could introduce which would make the function, policy or service work better for this group of people? Is further research or consultation required?**

*We would like to review the adaptation service in conjunction with the other district and social services in line with the Delivering Housing Adaptations for disabled people: A good practise guide – particularly in relation to children. In the short term we are discussing a wider range of options within West Wiltshire.*

*It would be to remove the suspension of discretionary grants without funding being available. Collection of requests for help and work on better information may help target the service better if funding is available in a couple of years. Also exploration of other forms of assistance and the advantages and disadvantages of these to help those affected.*

*We would like to increase the staffing for working on HMOs and other private rented housing. Initially this would be to find out the true size of the problems in this area and then to tackle these problems. This might include research and consultation to determine if additional licensing of HMOs was appropriate. We could also liaise with employers regarding migrant workers, which might give us a better picture of language needs, housing advice needed and the type of accommodation they are living in.*

**8. How will you monitor the take-up or impact of the function, policy or service in the next 18 months?**

*Monitor private rented housing more closely including the race / nationality and age of tenants and landlords  
Monitor requests for help from owner occupiers.*

**9. What actions do you plan to take as a result of this EIA – or the actions that you would you recommend to the transitional team? Please include target dates for completion of actions and resource implications where possible.**

*Consult further with children's OTs and other parts of housing to widen options from an early point. Jan 2008*

*Review of disabled persons service. Dependant on approval as strategic*

*Build on previous work to investigate the number of HMOs and plan a strategy for them. Liaise with employers regarding migrant workers. Dependant on staffing Early 2008*

*Set up monitoring systems for requests for service Jan 2008*

**10. If no actions have been identified in section 9 above, please state when a further review of this assessment is planned:**

**11. Name of person completing form:** *Janet Homewood*

**Date assessment completed:** *10<sup>th</sup> December 2007*

**12. Name of senior manager approving assessment:** *Graham hogg*

**Date assessment approved by senior manager:** *10/12/07*