

Cherwell District Council
Equality and Climate Impact Assessment
Housing Grants and Assistance Policy

Appendix 2

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Section 1: Summary details

<p>Directorate and Service Area</p>	<p>Wellbeing and Housing – Housing Services</p>
<p>What is being assessed (e.g. name of policy, procedure, project, service or proposed service change).</p>	<p>Cherwell District Council Housing Grants and Assistance Policy 2024</p>
<p>Is this a new or existing function or policy?</p>	<p>Combination and revision of two existing policies covering existing service functions</p>
<p>Summary of assessment</p> <p>Briefly summarise the policy or proposed service change. Summarise possible impacts. Does the proposal bias, discriminate or unfairly disadvantage individuals or groups within the community?</p> <p>(following completion of the assessment).</p>	<p>The Council recognises that having good quality housing is crucial for the health and wellbeing of Cherwell’s residents, and the overarching aim of this policy is to support our most vulnerable residents to live healthy lives in homes that meet their needs.</p> <p>We also seek to:</p> <ul style="list-style-type: none"> • Enhance the safety, health, and wellbeing of residents and contribute to reducing inequalities through improved housing conditions. • Support vulnerable and disabled residents to live with independence and dignity in their own homes. • Provide information, advice, and support to help residents make informed decisions and ultimately to achieve the best outcomes for their needs. • Contribute to reducing hospital admissions and facilitating faster hospital discharge, thereby helping to improve patient outcomes and reduce burdens on the NHS. • Contribute to tackling fuel poverty and climate change by improving energy efficiency of homes in the District.

	<ul style="list-style-type: none"> Contribute to reducing homelessness by helping to bring empty homes back into use.
Completed By	David North
Authorised By	Richard Smith
Date of Assessment	September 2024

Section 2: Detail of proposal

<p>Context / Background</p> <p>Briefly summarise the background to the policy or proposed service change, including reasons for any changes from previous versions.</p>	<p>Cherwell District Council has a statutory duty to administer mandatory Disabled Facilities Grants (DFGs). Currently the Council’s approach to delivering DFGs is set out in its “Disabled Adaptations Policy” which was last updated in 2021.</p> <p>Legislation also permits the Council to offer discretionary grants, loans and other forms of assistance to help improve housing conditions for the residents of its District, provided the Council has a policy setting out how it intends to use those discretionary powers. Currently the Council’s approach to offering discretionary grants is set out in its “Private Sector Housing Grant and Assistance Policy” which was last updated in 2012. The individual discretionary grants that we offer are implemented as delegated decisions under this overarching policy.</p> <p>Upon review it became apparent that there was duplication and overlap between the two policies owing to the high degree of similarity between mandatory and discretionary grants; for example, discretionary grants are often offered instead of, or in conjunction with, mandatory DFGs. Therefore, it is proposed these two policies are combined into a single, streamlined policy. Having a single policy to refer to rather than two overlapping policies should make things easier and clearer for officers and service users.</p> <p>The Council must carry out tests of financial resources (“means tests”) as part of the DFG process. However, applicants in receipt of certain benefits are automatically eligible (known as “passporting benefits”). The new policy</p>
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	<p>sets out a proposal to include Council Tax Reduction/Support (“CTR/S”) as a locally agreed passporting benefit. Undertaking fewer means tests has advantages for applicants and the Council. The means test is complex, requires applicants to provide a lot of financial information, and can delay the delivery of the adaptations they need. If the applicant is found to be over the income threshold they will need to make a contribution, which could be substantial even if their income is only in the form of other benefits that are not specifically excluded as passporting benefits. Applicants in receipt of CTR/S have already been means-tested by the Council, thereby reducing duplication of work. Doing fewer means tests means the Grants Team Caseworkers can focus on supporting applicants through the process and generally speeds up the delivery of grants and adaptations.</p> <p>This revised policy outlines when the Council may place grants as a Local Land Charge against the property so that the grant may be recovered when the property is sold. For mandatory DFGs, the circumstances are prescribed in the relevant legislation. This policy reflects those statutory provisions, and also sets out the circumstances when the Council may place and recover discretionary grants via Local Land Charges.</p> <p>The Private Sector Housing Grant and Assistance Policy (which this new policy replaces) was strictly an enabling policy and did not include details of any specific grants within the policy document. Instead, the individual discretionary grants that the Council offered at any given time were written as sub-policies and implemented as delegated decisions under this overarching policy. The Council’s current grant offering was considered in the course of this wider policy review, and it is proposed that the current grants all be withdrawn and be replaced with the suite of new grants outlined in this new Grants and Assistance Policy.</p> <p>For purposes of transparency, this new policy proposes to include a summary of each of the discretionary grants and other forms of assistance that the Council intends to offer. This will also make it easier for customers and Council Officers to know and understand the grants on offer. The specific details of how each grant will operate will still be contained within grant-specific sub-policies, and these details will be available on the Council’s website, provided as part of the application process, or on request.</p> <p>The types of conditions and criteria that the Council may apply when developing discretionary grants and assistance services have been simplified and examples added to make them easier for officers and customers to read and understand.</p>
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	<p>The revised policy has been rewritten and reformatted to be as clear and accessible as possible.</p>
<p>Proposals</p> <p>Explain the detail of the proposals, including why this has been decided as the best course of action.</p>	<p>The reviewed policy outlines the Council's statutory duties and responsibilities regarding the provision and administration of Disabled Facilities Grants. It provides an overview of the process that the Council follows with regard to DFGs and how decisions made are informed following tests and assessments that are applied.</p> <p>This policy sets out a proposal to include Council Tax Reduction as a locally agreed passporting benefit for the DFG means test. This will enable the Council to help more disabled people to more quickly receive the adaptations they need, and also save Council resources by not having to undertake as many time-consuming means tests.</p> <p>The policy outlines when the Council may place grants as a Local Land Charge against the property so that the grant may be recovered when the property is sold.</p> <p>The policy also proposes a reviewed discretionary grants offering, outlines how discretionary grants are administered and how they could be varied in the future.</p> <p>The general criteria and conditions for the grants offered by the Council are contained in the appendices of the policy.</p>
<p>Evidence / Intelligence</p> <p>List and explain any data, consultation outcomes, research findings, feedback from service users and stakeholders etc, that supports your proposals and can help to inform the judgements you make about potential impact on different individuals, communities</p>	<p>Foundations, the Government-funded national body for Home Improvement Agencies, recommend that councils introduce CTR as a passporting benefit to help more people access DFG funding.</p> <p>Last year, 27 DFG applications were ineligible for DFG funding as their assessed contributions under the statutory means test exceeded the DFG limit (£30k). The statutory DFG means test is prescribed in regulations which were last updated in 2008 meaning it is a very low benchmark by current standards, whereas CTR is updated annually. Using CTR as a passporting benefit would have enabled 4 more people to receive grants. We believe that more than this may have been eligible but have not applied for CTR, and so we may be able to encourage uptake.</p>

<p>or groups and our ability to deliver our climate commitments.</p>	<p>Uptake of several of our longstanding discretionary grants has declined in recent years, and other emerging issues have arisen. For example uptake of landlord grants has declined, particularly since 2020, whereas referrals relating to hoarding have increased year-on-year. The proposed discretionary grants have been developed following discussions with the other Oxfordshire councils to try and address areas of unmet need.</p> <p>Since 2019 the Council has received 4,522 applications for disabled adaptations. These applications include data which can be used to inform service delivery.</p>
<p>Alternatives considered / rejected</p> <p>Summarise any other approaches that have been considered in developing the policy or proposed service change, and the reasons why these were not adopted. This could include reasons why doing nothing is not an option.</p>	<p>The following alternative options have been identified and rejected for the reasons as set out below.</p> <p>Option 1: Not bring forward a reviewed and amended policy. As there has not been any recent changes to legislation in this area, there is no imperative for the current policy to be changed or reviewed. However, it is important the Council policies are reviewed regularly to ensure that they are able to meet customer needs, service needs and are legislatively sound. This option is therefore rejected.</p> <p>Option 2: To keep two separate policies, one for mandatory grants and one for discretionary grants. As the policy areas are closely linked and intertwine, particularly when offering grants to disabled households, having a single policy provides simplification and clarity. This option is therefore rejected.</p>

Section 3: Impact Assessment - Protected Characteristics

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Protected Characteristic	No Impact	Positive	Negative	Description of Impact	Any actions or mitigation to reduce negative impacts	Action owner* (*Job Title, Organisation)	Timescale and monitoring arrangements
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<p>Age</p>	<p><input type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p>The proposed policy includes discretionary grants and services designed to help older and vulnerable applicants and members of their households to live safely and independently at home. These are largely grants and services which the Council already offers, but with minor proposed adjustments, such as increasing the grant limit for essential repairs where there are long-term health conditions.</p> <p>New discretionary 'Dementia Support Grant' and 'Clear and Clean Grant' in particular should positively impact older people.</p> <p>Increasing the use of local land charges for grants may have an adverse impact on owner-occupying older people and their households.</p>	<p>Increasing the use of local land charges for grants may have an adverse impact on owner-occupying older people and their households. As mitigation, only certain larger grants relating to older households will only be repayable if the property is sold, transferred or disposed of within 10 years, and the Council retains discretion not to recover if doing so would cause undue hardship.</p>	<p>Housing Grants and Standards Team Leader</p>	<p>Annual monitoring</p>
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<p>Disability</p>	<p><input type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p>The proposed policy includes mandatory and discretionary grants and services designed to help disabled people to live safely and independently in their own homes.</p> <p>The disabled adaptations grants are largely grants and services which the Council already offers, but with minor proposed adjustments that should generally have no impact or a positive impact on service users.</p> <p>The Council already applies land charges for mandatory DFGs. This policy proposes to also apply land charges for certain discretionary grants. Increasing the use of local land charges for grants may have an adverse impact on owner-occupying disabled people and their households.</p>	<p>Increasing the use of local land charges for grants may have an adverse impact on owner-occupying disabled people and their households. As mitigation, only certain larger grants relating to disabled households will be repayable if the property is sold, transferred or disposed of within 10 years, and the Council retains discretion not to recover if doing so would cause undue hardship.</p>	<p>Housing Grants and Standards Team Leader</p>	<p>Annual monitoring</p>
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Gender Reassignment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	There is nothing to suggest that the Grants and Assistance Policy will have any impact on Gender Reassignment.	N/A	N/A	N/A
Marriage & Civil Partnership	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	There is nothing to suggest that the Grants and Assistance Policy will have any impact on Marriage and Civil Partnership.	N/A	N/A	N/A
Pregnancy & Maternity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	There is nothing to suggest that the Grants and Assistance Policy will have any impact on Pregnancy and Maternity.	N/A	N/A	N/A

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Race	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The data on applicant ethnicity for disabled adaptations appears to show a slightly higher proportion of white applicants compared to the overall Cherwell population. The proportion of other races were under-represented compared to Census data.</p> <p>No equivalent data is collected for other types of discretionary grants as the volume of applications is much lower than for disabled adaptations.</p> <p>Any changes to the Grants and Assistance Policy may therefore affect those in ethnic minority groups, both positively and negatively, more so than a change affecting the whole of the population of Cherwell.</p>	<p>Annual monitoring and comparisons of housing grants ethnicity data to monitor potential impacts.</p> <p>Work with Oxfordshire County Council to try and increase DFG uptake from under-represented groups.</p>	<p>Housing Grants and Standards Team Leader</p>	<p>Annual monitoring</p>
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Sex	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The policy includes an existing discretionary Target Hardening grant which is predominantly focused on survivors and victims of domestic abuse, who tend to be women.	N/A	N/A	N/A
Sexual Orientation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	There is nothing to suggest that the Grants and Assistance Policy will have any impact on Sexual Orientation.	N/A	N/A	N/A
Religion or Belief	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	There is nothing to suggest that the Grants and Assistance Policy will have any impact on Religion or Belief.	N/A	N/A	N/A

Section 3: Impact Assessment - Additional Community Impacts

Additional community impacts	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner (*Job Title, Organisation)	Timescale and monitoring arrangements
Rural communities	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The revised policy proposes a discretionary grant to help bring empty properties back into use which is likely to have greatest impact in rural areas.	N/A	N/A	N/A
Armed Forces	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Members or former members of the armed forces with disabilities are likely to be affected by this policy, but the impact compared with their experiences under the previous policies should be neutral or positive.	N/A	N/A	N/A
Carers	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The proposed policy includes mandatory and discretionary grants and services designed to help disabled people and their carers. The disabled adaptations grants are largely grants and services which the	Increasing the use of local land charges for grants may have an adverse impact on owner-occupying disabled people and their households. As mitigation, only certain larger grants relating to	Housing Grants and Standards Team Leader	Annual monitoring

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Additional community impacts	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner (*Job Title, Organisation)	Timescale and monitoring arrangements
				<p>Council already offers, but with minor proposed adjustments that should generally have no impact or a positive impact on service users and carers.</p> <p>The Council already applies land charges for mandatory DFGs. This policy proposes to also apply land charges for certain discretionary grants. Increasing the use of local land charges for grants may have an adverse impact on owner-occupying disabled people and their households.</p>	<p>Disabled households will be repayable if the property is sold, transferred or disposed of within 10 years, and the Council retains discretion not to recover if doing so would cause undue hardship.</p>		
Areas of deprivation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The revised policy proposes a discretionary grant to help bring empty properties back into use which is likely to have greatest impact in deprived areas.</p>	N/A	Housing Grants and Standards Team Leader	N/A

Section 3: Impact Assessment - Additional Wider Impacts

Additional Wider Impacts	No Impact	Positive	Negative	Description of Impact	Any actions or mitigation to reduce negative impacts	Action owner* (*Job Title, Organisation)	Timescale and monitoring arrangements
Other Council Services	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	There is nothing to suggest that the Grants and Assistance Policy will have any impact on other council services	N/A	N/A	N/A
Providers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	There is nothing to suggest that the Grants and Assistance Policy will have any impact on Providers.	N/A	N/A	N/A
Social Value ¹	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	N/A

¹ If the Public Services (Social Value) Act 2012 applies to this proposal, please summarise here how you have considered how the contract might improve the economic, social, and environmental well-being of the relevant area

Section 3: Impact Assessment - Climate Change Impacts

OCC and CDC aim to be carbon neutral by 2030. How will your proposal affect our ability to reduce carbon emissions related to

Climate change impacts	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner (*Job Title, Organisation)	Timescale and monitoring arrangements
Energy use in our buildings or highways	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	N/A
Our fleet	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	N/A
Staff travel	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	N/A
Purchased services and products (including construction)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	N/A
Maintained schools	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	N/A

We are also committed to enable Cherwell to become carbon neutral by 2030 and Oxfordshire by 2050. How will your proposal affect our ability to:

Climate change impacts	No Impact	Positive	Negative	Description of impact	Any actions or mitigation to reduce negative impacts	Action owner (*Job Title, Organisation)	Timescale and monitoring arrangements
Enable carbon emissions reduction at district/county level?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>This policy proposes a discretionary empty homes grant that would require energy efficiency improvements before letting or sale.</p> <p>Where grants require works to be undertaken, regard is had to commissioning energy efficient and repairable equipment and adaptations.</p>	N/A	N/A	N/A

Section 4: Review

Where bias, negative impact or disadvantage is identified, the proposal and/or implementation can be adapted or changed; meaning there is a need for regular review. This review may also be needed to reflect additional data and evidence for a fuller assessment (proportionate to the decision in question). Please state the agreed review timescale for the identified impacts of the policy implementation or service change.

Review Date	Annual
Person Responsible for Review	Housing Grants and Standards Team Leader
Authorised By	Head of Housing