

# Customer Access Review – Full Assessment

Assessment details		
Assessment area		Disabled Facility Grant Policy
Date of assessment		February 2016
Directorate and Service		Strategic Directorate (External Services), Housing Services
Manager		Peter Dosad
Officer conducting assessment		Rachel Evans
Step 1: Scoping the assessment		
1	What are the aims and objectives of the activity or proposal?	To ensure Dartford Borough residents are able to access Disabled Facilities Grants to provide disabled adaptations to their home and to provide a clear and transparent policy for doing so.
2	Who will be affected?	All eligible Dartford Borough residents, their families, carers and providers of associated services.
3	How does the activity or proposal contribute to: a) any key performance indicators? b) policies, values or objectives of Dartford Borough Council?	To positively impact on residents lives by helping them to live independently. The Policy relates to the Council's Corporate Plan 2014-17 strategic aim to facilitate quality, choice and diversity in the housing market, to create strong and self-reliant communities and deliver high quality services to service users, and the strategic objective of meeting the housing needs in the borough.

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<p>4</p>	<p><b>Which aspects of the activity or proposal are dictated by legislation/regulation and where do we have discretion in how they are delivered?</b></p>	<p>The Council has a duty under the Housing Grants, Construction and Regeneration Act 1996 (HGCRA) to provide Disabled Facility Grants (DFG) (of up to £30,000 per application). Before granting a DFG, the Council must satisfy itself that the works are respectively, <b>necessary and appropriate</b> to meet the needs of the disabled person and are <b>reasonable</b> and <b>practicable</b> to implement, depending on the age and condition of the property. The HGCRA 1996 imposes a duty on the Council to consult social services authorities in coming to a view on whether the proposed works are ‘necessary and appropriate’, but it is for the Council to decide whether those works are ‘reasonable and practicable.’</p> <p>In reaching a decision the authority will consider the following factors: whether the proposed adaptations or improvements:</p> <ul style="list-style-type: none"><li>• are needed to provide for a care plan to be implemented which will enable the disabled occupant to remain living in their existing home as independently as possible;</li><li>• would meet, as far as possible, the assessed needs of the disabled person taking into account both their medical and physical needs; and</li><li>• distinguish between what is desirable and possible legitimate aspirations of the disabled person, and what is actually needed and for which grant support is fully justified.</li></ul> <p>The Council will also have specific regard to the age and condition of the property, the effect on other residents, the practicalities of carrying out work on properties with limited access, conservation considerations, and the structural characteristics of the property.</p> <p>The Council does not currently provide discretionary assistance outside of the mandatory DFG process.</p>
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		<p>The Policy is tenure neutral so households across all tenures can apply. However, there is a separate Disabled Adaptations Policy for Council tenants which include within it the additional benefit of the Council maintaining the adaptation works. Ultimately it is the applicants choice which assistance scheme they apply to. The Council’s tenant Disabled Adaptations process does not include means testing. Regulations relating to this policy are laid down in law and cannot be deviated from. The Council is obliged under the Equality Act 2010 to complete some types of adaption works if it is reasonable to do so. In accordance with the Equality Act 2010, the Council has ensured that its DFG service is equally accessible to all.</p> <p>The DFG process was internally audited in July 2015 and was assessed as being Good, all recommendations made have been followed.</p>
<p><b>Step 2: Information collection</b></p> <p>Note: Equality and Diversity information for Dartford can be found at <a href="http://www.kent.gov.uk/about-the-council/information-and-data/Facts-and-figures-about-Kent/equality-and-diversity-data">http://www.kent.gov.uk/about-the-council/information-and-data/Facts-and-figures-about-Kent/equality-and-diversity-data</a></p>		
5	<p><b>What do you know about the groups of people who will be affected?</b> i.e. demographic information in relation to the protected characteristic groups (age, disability, pregnancy and maternity, religion or belief, race, sex, sexual orientation, gender reassignment)</p>	<p>The policy affects any resident who is registered as a disabled person, or who would qualify to be registered. From 1 April 2014 to 1 April 2016 78 adaptations were carried out</p> <p>There is no single measure of disability. Using the broadest definition (2011 Census) 14,735 residents in Dartford (15.1%), have a health problem or disability which limits their day-to-day activities. Of this, 6,621 residents or 44.9% of those with long term <b>health problem or</b> disability have their day to day activities limited a lot. 6,647 residents or 6.5% of residents claim disability benefits DLA, AA or PIP.</p> <ul style="list-style-type: none"> <li>• 49.3% of the Dartford population are male</li> <li>• 19.5% of the population are 60 or over</li> <li>• 12.65% of the population are Black Minority Ethnic (BME) population is defined as all ethnic groups excluding White British, White Irish and White Other. Of these, largest groups being African 2.89% and</li> </ul>

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		<p>Indian 2.74%</p> <ul style="list-style-type: none"> <li>• 0.25% Gypsy or Irish Traveller</li> </ul> <p>Monitoring information gathered in DFG cases 2014-15 shows that of those who answered the ethnicity question 66.6% were White British, 16.6% Other White, and 16.6% African Of those who answered the age question 28% were children, 22% were aged 19 to 45, 22% were 60 – 70 and 28% were over 70.</p> <p>The information shows that half of the applications were made by persons over the age of 60 whilst 19.5% of the population are over 60 thus there is a high take up of DFGs from this group. It should be noted that the DFG policy is specifically for disabled residents and it is therefore to be expected that the characteristics of applicants will be different to the borough as a whole.</p> <p>Over the period April 2014 – April 2016 63.1% of completed DFGs were for female applicants. This is higher than the total female population in the borough of 50.7% outlined in the census, however this could be explained by the fact that women generally live longer; life expectancy from birth is 2.9 years higher for females</p> <p>The Council has not historically collected information on other groups i.e. religion, sexual orientation etc and these are additional questions which will be added to the monitoring form sent out to DFG applicants.</p> <p>The Council does not have a waiting list for DFG’s and cases are processed as quickly as possible. All cases are dealt with well within the timescales set by the legislation.</p>
6	<p><b>What consultation has taken place with affected groups? Please describe who was consulted and the key findings</b></p>	<p>KCC occupational therapists were consulted. Comments received on the previous policy were also considered in the review. Queries were raised as to how applications could be made and the use of the HIA – the policy was</p>

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		<p>revised to make it clear that all tenure groups can apply for a DFG and applications can be made by individuals or via private Agents, as well as private OT's. The Council carries out customer satisfaction surveys on DFG's completed. Customer feedback in 2014/15 showed that 100% of customers said that their overall impression of the service was good or very good.</p>
<p><b>7</b></p>	<p><b>Are there any gaps in information? If so, what additional research and/or consultation is needed to ensure that affected groups needs and views are taken into account?</b></p>	<p>No additional research required as the Council is under a duty to provide DFG's to eligible applicants where necessary and appropriate and reasonable and practicable to do so. Where they are provided residents are fully consulted prior to the installation of adaptations with the support and guidance of an occupational therapist or agent.</p> <p>Any future Policy revisions will include consulting the public/service users for their views.</p> <p>Information on applying for a DFG is available via leaflet, website and government promotional material as well as locally; particularly via the local Home Improvement Agency (HIA). The HIA has a Punjabi speaking Officer. Assistance is available via the HIA to complete the DFG application form. The Council can also access a translation service if necessary.</p> <p>Additional information/promotional work is planned including awareness training for staff in other Agencies/Organisations, improvements to the Council's website and provision of a leaflet/guide on DFGs for applicants.</p>

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### Step 3: Assessing the equality impact

<b>8</b>	<p><b>Consider whether the activity or proposal has or will have any positive or negative equality impacts on the protected characteristic groups in relation to the following aims of the General Equality Duty:</b></p> <p><b>a) tackling unlawful discrimination</b>  <b>b) promoting equality of opportunity</b>  <b>c) promoting good relations</b></p> <p><u>NOTES:</u></p> <ul style="list-style-type: none"> <li>• The Initial Screening will have identified which aims of the Public Sector Equality Duty are relevant to the activity or proposal for consideration</li> <li>• For existing activities, consider how they are working in practice for each relevant protected group</li> <li>• For new proposals, consider whether there is anything that could give rise to positive and negative equality impacts for each relevant protected group</li> <li>• If there is no identified equality impact, please tick the 'No Impact' box and explain why in question 9</li> <li>• If the equality impact is unclear, please tick the 'Unknown' box and explain why in question 9</li> </ul>			
	<b>POSITIVE IMPACTS</b>	<b>NEGATIVE IMPACTS</b>	<b>NO IMPACT</b>	<b>UNKNOWN</b>
<b>a</b>	<p><b>Age</b></p> <p>The provision of adaptations is available to residents regardless of age and so enables people of all ages to live independently and with dignity. Information on service users accessing the service suggests that half of applications are made by people over the age of 60. This is due to the nature of older people developing disabilities with age and not due to older people being specifically targeted.</p>	<p>None identified</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>b</b>	<p><b>Disability</b></p> <p>DFGs are for the benefit of someone who is registered as a disabled person, or who would qualify to be</p>		<input type="checkbox"/>	<input type="checkbox"/>

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		registered. The provision of adaptations therefore enables disabled people to live independently and with dignity. People with hearing and sight impairments are able to request information about the service in alternative formats (e.g. Braille and Audio Tape) as part of our corporate policy.	However at present these options have not been included in our leaflet so clients may not be aware of this.		
<b>c</b>	<b>Gender (including reassignment)</b>	Not applicable	None identified	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>d</b>	<b>Race</b>	Non-English speaking groups are able to request translated information about the service and we can provide interpreters. The HIA also has a Punjabi speaking Officer	None identified	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>e</b>	<b>Religion/Belief</b>	The timing of works will be arranged with the applicants co-operation so any religious/faith holidays to be taken into account		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>f</b>	<b>Sexual Orientation</b>	Not applicable	None identified	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>g</b>	<b>Pregnancy/Maternity</b>	Not applicable	None identified	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>9</b>	<b>If 'no impact' or 'unknown' was selected, please explain</b>	The provision of adaptations is exclusively for those disabled persons who require them. They will be provided regardless of the addition of any other protected characteristic.			
<b>10</b>	<b>If DBC works with partners to deliver the activity or proposal, please describe circumstances that could give rise to positive/negative equality impacts between different groups</b>	The Council works with KCC occupational therapists and the HIA to ensure that the works are necessary and are appropriate for the client's needs. There are no known circumstances where this will have either a positive or negative impact between different groups.			
<b>11</b>	<b>Any other comments</b>	None			

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### Step 4: Action plan

11. Based on the information in Steps 1 and 2, please list the actions that will be taken to address:

- a) any gaps in information and consultation
- b) how any negative impacts on equality will be mitigated or eradicated

a) If additional information and/or consultation is required or the impact is still unclear, what actions will you put in place to gather the information you need?

Information needs	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
None					

b) If any negative impacts on equality were found, what actions will you put in place to mitigate or eradicate these impacts?

Identified impacts (and who is affected)	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
Applicants with sight or hearing impairments or where English is not their first language may not know that they can access information about the service in their required format as we do not include this in our leaflet/promotional material	Include the corporate translation and alternative format strapline in promotional material				
Information not gathered on religion or sexual orientation	To be added to monitoring form sent to applicants				
No waiting list could	Additional promotion of				

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mean some applicants are not taking up the assistance as they are unaware of it	DFG				
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### Step 5: Decision making and future monitoring

<b>13</b>	<b>Which decision making process does this Customer Access Review need to go through? i.e. who does this need to be approved by?</b>	Relevant Director
<b>14</b>	<b>How will you continue to monitor the impact of the activity or proposal on the equality groups?</b>	New assessments will be undertaken as and when the policy is significantly updated or reviewed.
<b>15</b>	<b>When will you review this Customer Access Review?</b>	As required or in 2 years.

### Step 6: Final steps

<b>16</b>	<b>Once this Customer Access Review has been approved, send this assessment to the Policy &amp; Projects Officer</b>
<b>17</b>	<b>If the subject of the Customer Access Review is going to committee, summarise your findings in the committee report</b>
<b>18</b>	<b>Implement the actions identified from this Customer Access Review and ensure progress is monitored and recorded</b>