

# Customer Access Review – Full Assessment

<b>Assessment details</b>	
<b>Assessment area</b>	Private Sector Housing Renewal Strategy (2022-2025)
<b>Date of assessment</b>	11 April 2022
<b>Directorate and Service</b>	Housing and Public Protection, Housing Services
<b>Manager</b>	Housing Solutions and Private Sector Manager
<b>Officer conducting assessment</b>	Senior Housing Policy & Performance Officer
<b>Step 1: Scoping the assessment</b>	
<b>1. What are the aims and objectives of the activity or proposal?</b>	<p>The Private Sector Housing Renewal Strategy 2022-2025 sets out the current position regarding the condition of the private sector housing stock and the need for improvements. It also sets out the types of assistance that will be made available by the Council for housing renewal and how this will be targeted.</p> <p>In order to tackle the issues highlighted in this Strategy, the Council has identified two key priorities for action:</p> <ol style="list-style-type: none"> <li>1. To enable residents to live independently in safe and healthy homes. The key areas associated with this priority are: <ul style="list-style-type: none"> <li>• Elimination of Category 1 HHSRS hazards and reduction of disrepair</li> <li>• Promotion of safe independent living for those residents who wish it</li> </ul> </li> <li>2. To decrease the numbers of households who are in fuel poverty and/or suffering from 'excess cold' and improve the overall energy efficiency of the private sector stock in Dartford. The key areas associated with this priority are: <ul style="list-style-type: none"> <li>• Elimination of Category 1 HHSRS Excess Cold Hazard</li> <li>• Wall and loft insulation measures</li> <li>• Efficient heating methods</li> <li>• Improved EPC and SAP ratings</li> </ul> </li> </ol> <p>There are a range of housing renewal assistance options available, as follows:</p> <p><b>Disabled Facilities Grant Policy</b></p> <p>This policy sets out how the Council administers the Disabled Facilities Grant (DFG), which is a mandatory grant limited to £30,000 towards the cost of providing adaptations and facilities which include access into and around the property and the main rooms used by the disabled person, safety of the disabled person and adapting the heating and lighting controls for a disabled person in a dwelling, qualifying houseboats and caravans or in the common parts of a building containing one or more flats.</p>

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	<p><b>Private Sector Housing Discretionary Assistance Policy</b> This policy provides non-means tested and non-repayable assistances not provided through any other means to prevent admissions or readmissions to hospital, improve health and wellbeing and to provide funding to eligible households for essential repairs or heating/insulation installation which, if not carried out, may have a detrimental impact on their health and wellbeing. As a result they also assist in housing renewal in the Borough. The grants are detailed in full within the policy:</p> <ul style="list-style-type: none"><li>• Hospital Discharge Grant (HDG). The maximum grant is £10,000.</li><li>• Safe and Secure Grant (SSG). The maximum grant is £10,000 with the exception of insulation measures (roof/loft and wall), where the maximum grant is £2,000*.</li><li>• Discretionary Assistance Grant (also part of the Council's DFG Policy). The maximum grant is £15,000.</li><li>• Top up contribution grant for mandatory DFGs. The maximum grant is £10,000. Relocation Grant The Maximum grant is £10,000</li><li>• Non person specific assistance</li></ul> <p><b>Kent and Medway Warm Homes Scheme</b> This scheme is a partnership project between Kent County Council and district councils to support residents in Kent and Medway to save energy in their home. The programme can offer subsidised insulation through Energy Company Obligations funding.</p> <p><b>Empty Property Loan Assistance – ‘No Use Empty’ Initiative</b> This scheme aims to bring empty properties back into use as quality housing accommodation. A short term secured interest free loan of up to £25,000 per unit rising to a maximum loan of up to £175,000 (7+ units) can be applied for (subject to availability of funds) with a repayment date no later than 36 months.</p> <p>New assistances available include:</p> <p><b>Net Zero Grant</b> –This new grant will assist in tackling fuel poverty and improve energy efficiency and is aimed at homeowners, over 18 years old in receipt of certain benefits or on a low income with a vulnerability to living in a cold home. The maximum grant is £1,500 and the premises must have a low energy rating; EPC rating of E, F or G.</p>

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<p><b>Step 1: Scoping the assessment</b></p>	<p><b>Repairs Grant</b> – This new grant will assist homeowners, certain leaseholders and private tenants with a repair obligation to carry out essential works to their homes to eradicate Category 1 hazards or disrepair. Applicants must be over 18 and on a low income. The maximum grant is £1,500. Non-financial assistances funded by the Council include:</p> <p><b>Home Improvement Agency</b> This service provides support to residents and works closely with the Private Sector Housing team in delivering services to older, vulnerable and disabled people who are private homeowners or tenants of private landlords.</p> <p><b>Health &amp; Housing Co-ordinator</b> This is a full time post at Darent Valley Hospital to assist persons leaving hospital as well as offering a service to help residents retain safe and independent living in their own home. It is a tenure neutral service provided free of charge.</p> <p><b>Home Straight Officer</b> This is a hoarding co-ordinator post with mental health specialism for customers aged 65 year or older or have a long term health condition that is being exacerbated by the conditions in which they live; or are living in housing with significant disrepair issues that need urgently addressing and are impacting on a person’s physical health but cannot be addressed due to the clutter within.</p> <p><b>Subsidised Handyperson Service</b> This service is delivered through the local Home Improvement Agency. The service undertakes minor repairs of a DIY nature for residents within the borough of Dartford, following checks on repair responsibilities.</p> <p><b>Subsidised Handyperson Enablement</b> This service is delivered through the Home Improvement Agency. The service offers both discharge and practical support to help people get discharged from hospital more quickly and to prevent admissions to hospital by offering practical solutions to problems around the home.</p> <p>Enforcement action will also be used by the Council to improve local housing conditions.</p>
<p><b>2. Who will be affected by the activity or proposal?</b></p>	<p>The Private Sector Housing Renewal Strategy affects residents in the private sector and private sector landlords and home owners in the Borough.</p>

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Step 1: Scoping the assessment	
<p>3. How does the activity or proposal contribute to:</p> <p>a) any key performance indicators?</p> <p>b) policies, values or objectives of Dartford Borough Council?</p>	<p>a) Corporate Plan performance indicators:</p> <ul style="list-style-type: none"> <li>• BI 14: Number of service requests received for Private Sector Housing</li> <li>• HP 20: Number of service requests completed for Private Sector Housing</li> <li>• BI 13: Number of private sector dwellings returned to occupation</li> </ul> <p>b) The Private Sector Housing Renewal Strategy contributes to the Corporate Plan strategic aim of 'facilitating quality, choice and diversity in the housing market, assist in meeting housing need in Dartford and deliver high quality services to service users'. The Strategy also relates to the strategic objective to 'support a strong, high quality, private rented sector'.</p>
<p>4. Which aspects of the activity or proposal are dictated by legislation/regulation and where do we have discretion in how they are delivered?</p>	<p>Under the Housing Act 2004, local authorities are required to understand the condition of their housing stock and to develop strategies and approaches to address issues of concern. A local authority must keep the housing conditions in their area under review with a view to identifying any action that may need to be taken by them.</p> <p>Article 3 of the Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 gave local housing authorities wide ranging powers to provide assistance for housing renewal. Article 4 of the Order prevents local housing authorities from exercising their article 3 power unless they have adopted a policy for the provision of assistance under that article and given publicity to the policy and act in accordance with it.</p> <p>The Council has discretion in where to target resources for housing renewal assistance under the Private Sector Housing Renewal Strategy. This is informed by the results of the private sector stock modelling report.</p>
Step 2: Information collection	
<p>5. What do you know about the groups of people who will be affected? (i.e. demographic information in relation to the protected characteristic groups of age, disability, pregnancy and maternity, religion or belief, race, sex, sexual orientation, gender reassignment, marriage and civil partnership)</p>	<p>There are 47,849 dwellings in Dartford, 86.9% of which are within the private sector (owner-occupied and private rented) and 13.1% are social rented.</p> <p>The population profile of Dartford is, as follows:</p> <ul style="list-style-type: none"> <li>• <b>Population</b> – Dartford's population is 114,100.</li> <li>• <b>Gender</b> – There are slightly more female residents than male residents in Dartford, where 50.7% people are female and 49.3% people are male.</li> <li>• <b>Age</b> – The mean age in Dartford is 37.4 years, which is slightly lower than the overall Kent mean age of 41.4 years.</li> </ul>

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Step 2: Information collection	
	<ul style="list-style-type: none"> <li>• <b>Ethnicity</b> – The largest ethnic group in Dartford is White (87.4%) whilst the remaining 12.6% of Dartford’s residents are from a Black Minority Ethnic (BME) group made up of four broad groups (Asian/Asian British; Black/African/Caribbean/Black British; Mixed/Multiple Ethnic Group and Other Ethnic Group). The Asian/Asian British group is the largest BME group in Dartford (6.0%).</li> <li>• <b>Disability</b> – 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 health problem or disability have their day to day activities limited a lot.</li> <li>• <b>Religion or belief</b> – Almost three quarters of Dartford residents follow a religion. Christianity is the largest religion (60.64%) followed by the Muslim (Islam) religion (1.61%). 27.20% of residents have no religion and 6.56% did not state a religion.</li> <li>• <b>Sexual orientation</b> – 0.2% of Dartford’s residents are in a registered same-sex civil partnership.</li> <li>• <b>Gender reassignment</b> – At present there is no single source of data that provides a measure of the number of people who are going through or have gone through gender reassignment. (Sources: Mid-Year Population Estimate, 2011 Census, Vital Statistics – ONS)</li> </ul> <p>The population of Dartford will rise steadily in the coming years to 145,700 in 2034. The growth in population will be concentrated in the older age groups with the number of 45 to 64 year olds increasing by 37.7% and those over 65 also by 37.9%.</p>
<p><b>6. What consultation has taken place with affected groups? Please describe who was consulted and the key findings</b></p>	<p>Internal consultation has been undertaken on the Private Sector Housing Renewal Strategy.</p> <p>Members of the public and the following key stakeholders were invited to provide comments on the draft Private Sector Housing Renewal Strategy:</p> <ul style="list-style-type: none"> <li>• Home Improvement Agency</li> <li>• Private sector landlords</li> <li>• Landlord Groups</li> <li>• Other Local Authorities</li> <li>• Clinical Commissioning Group</li> <li>• Kent Fire and Rescue Service</li> <li>• Kent County Council including Public Health, Social Services and Trading Standards</li> <li>• Citizens Advice Bureau (CAB)</li> </ul>

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<b>Step 2: Information collection</b>	
	There was 1 representation submitted to the consultation. There were no equality issues raised regarding the draft Strategy from the consultation.
7. 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?	None

<b>Step 3: Assessing the equality impact</b>	
<p>8. 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 Public Sector Equality Duty:</p> <p>a) tackling unlawful discrimination  b) promoting equality of opportunity  c) promoting good relations</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>Step 3: Assessing the equality impact</b>				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
Age	Housing renewal assistance is designed to reduce admissions and readmissions to hospital, improve health and wellbeing, promote independence, improve housing conditions,		<input checked="" type="checkbox"/>	<input type="checkbox"/>

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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	<p>tackle fuel poverty, and to ensure that the person can remain in their own home as long as possible.</p> <p>Older vulnerable adults are more likely to have disabilities and qualify for housing renewal assistance than younger adults. This may be due in part not only to the increase of disability due to health conditions related to aging but also to lower levels of income once people are no longer working.</p> <p>In accordance with regulations, applications for Disabled Facilities Grants on behalf of a disabled person under the age of 19 are not means tested e.g. where the application is for a disabled child or qualifying 'young person'.</p> <p>Home visits are available for service users who are vulnerable and unable to complete grant application forms by themselves.</p>			
<b>Disability</b>	<p>Housing renewal assistance is designed to reduce admissions and readmissions to hospital, improve health and wellbeing, promote independence, improve housing conditions, tackle fuel poverty, and to ensure that the person can remain in their own home as long as possible. Housing renewal assistance enables a responsive service to disabled people, improving the quality of life and safety.</p>		<input checked="" type="checkbox"/>	<input type="checkbox"/>

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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	<p>Home visits are available for service users who are vulnerable and unable to complete grant application forms by themselves.</p> <p>In accordance with the Council's Equality &amp; Diversity Document Framework, the Private Sector Housing Renewal Strategy and information about the services provided regarding housing renewal assistance, can be provided in alternative formats, including: Braille, audio tape and large print versions of documents. British Sign Language interpreting services can be provided upon request. Calls can also be received via Relay UK.</p>			
<b>Sex</b>			<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Gender reassignment</b>			<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Race</b>	<p>In accordance with the Council's Equality &amp; Diversity Document Framework, the Private Sector Housing Renewal Strategy and information about the services provided regarding housing renewal assistance, can be provided in alternative formats, including: documents translated into other languages. Telephone and face-to-face language interpreting can be provided upon request. The Home Improvement Agency also has a Punjabi speaking Officer.</p>		<input type="checkbox"/>	<input type="checkbox"/>
<b>Religion/Belief</b>	<p>The timing of works can be arranged with the applicant's co-operation so any religious/faith holidays to be taken into account.</p>		<input type="checkbox"/>	<input type="checkbox"/>



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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
Sexual Orientation			<input checked="" type="checkbox"/>	<input type="checkbox"/>
Pregnancy/Maternity			<input checked="" type="checkbox"/>	<input type="checkbox"/>
Marriage and Civil Partnership*			<input checked="" type="checkbox"/>	<input type="checkbox"/>

\* Regarding the protected characteristic of Marriage and Civil Partnership – public bodies need to comply with the first aim of the Public Sector Equality Duty and only in the context of employment.

Step 3: Assessing the equality impact	
<p><b>9. If 'no impact' or 'unknown' was selected, please explain</b></p>	<p>There are no known circumstances where the Private Sector Housing Renewal Strategy will have a disproportionate equality impact on the protected characteristic groups of sex, gender reassignment, sexual orientation, pregnancy/maternity and marriage and civil partnership. Housing renewal assistance will be provided regardless of the addition of any of these protected characteristics.</p>
<p><b>10. If Dartford Borough Council works with partners to deliver the activity or proposal, please describe any circumstances that could give rise to positive or negative equality impacts between different groups</b></p>	<p>The Council works in partnership with a number of key partners to deliver the Private Sector Housing Renewal Strategy, including:</p> <ul style="list-style-type: none"> <li>• Home Improvement Agency</li> <li>• Private sector landlords</li> <li>• Landlord Groups</li> <li>• Other Local Authorities</li> <li>• Clinical Commissioning Group</li> <li>• Kent Fire and Rescue Service</li> <li>• Kent County Council including Public Health, Social Services and Trading Standards</li> <li>• Citizens Advice Bureau</li> </ul> <p>There are no known circumstances where these partnership working arrangements will have a disproportionate equality impact on the protected characteristic groups other than to positively improve housing</p>

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<b>Step 3: Assessing the equality impact</b>	
	<p>conditions, particularly for the most vulnerable. Effective communication with partnerships will ensure the correct support is provided through information sharing.</p>
<b>11. Any other comments</b>	<p>The Private Sector Housing Renewal Strategy is generally targeted towards assisting older, disabled, vulnerable and low income households living in private sector housing in need of renewal. The Strategy aims to remove or minimise disadvantages in the housing conditions experienced by such households, and to take steps to meet their needs. As such, this assistance should have a positive impact on the health, safety and quality of life of these households.</p> <p><b>Awareness raising of the assistance available</b>          To promote equality of opportunity to access the housing renewal assistance available, there will be an awareness raising campaign. The Strategy will be available on the Council’s website and hard copies can be provided on request. The schemes are promoted to and via the Council’s partner agencies. Promotional leaflets are/will be distributed to these agencies and via mail outs for example to pharmacies, GP surgeries etc. Adverts are/will be placed in relevant publications for example ‘Health &amp; Community’ Magazine available to Dartford and Gravesham areas including patients/visitor’s to Darent Valley Hospital, GP surgeries and on their social media page. Promotions have/will be via ‘Dartford Life’ publication and social media applications.</p> <p>While private rented tenants are not eligible for the full range of renewal assistance available, unless they have a repairing tenancy – the Council’s work with private rented tenants is mainly focused on taking enforcement action against landlords in order to improve housing conditions in the private rented sector.</p> <p><b>Complaints</b>          Any service user who is not satisfied with the service they have received or who believes they have been discriminated against can make a formal complaint to the Council using the corporate complaints process.</p>

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<b>Step 4: Action plan</b>					
12. Based on the information in Steps 1 to 3, 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
None					
<b>Step 5: Decision making and future monitoring</b>					
13. Which decision making process does this Customer Access Review need to go through? i.e. who does this need to be approved by?			Director of Housing and Public Protection in consultation with Legal Services		
14. Is the subject of the Customer Access Review going to committee? If yes, include your findings in the committee report and attach this assessment to the report			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
15. How will you continue to monitor the activity or proposal on protected characteristic groups?			<p>The following performance indicators are monitored under the Private Sector Housing service:</p> <ul style="list-style-type: none"> <li>• BI 14: Number of service requests received for Private Sector Housing</li> <li>• HP 20: Number of service requests completed for Private Sector Housing</li> <li>• BI 13: Number of private sector dwellings returned to occupation</li> </ul> <p>The Strategy includes an action to seek feedback from customers on a monthly basis on the grants process. This customer satisfaction data</p>		

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<b>Step 5: Decision making and future monitoring</b>	
	will be used alongside any complaints data to monitor the performance of the services provided.
<b>16. When will you review this Customer Access Review?</b>	New assessments will be undertaken in the development of a new Private Sector Housing Renewal Strategy.
<b>Step 6: Final steps</b>	
<b>17. Once this Customer Access Review has been approved, send this assessment to the Policy &amp; Projects Officer</b>	
<b>18. Implement the actions identified from this Customer Access Review and ensure progress is monitored and recorded</b>	

Reviewed by Legal Services - 28.04.2022

Reviewed by Director of Housing and Public Protection - 29.4.2022