

Customer Access Review – Full Assessment

Assessment details	
Assessment area	Aids and Adaptations Policy for Council Tenants
Date of assessment	October 2024
Directorate and Service	Housing and Public Protection, Housing Services
Manager	Housing Maintenance Manager
Officer conducting assessment	Housing Policy & Performance Officer
Step 1: Scoping the assessment	
1. What are the aims and objectives of the activity or proposal?	<p>There may be situations or circumstances where tenants of Dartford Borough Council require aids and adaptations to their homes to make them safer to live in and to help them to live independently. The Policy sets out the two categories of aids and adaptations that can be carried out to tenants homes: minor adaptations and major adaptations.</p> <p>The Aids and Adaptations Policy for Council Tenants aims to set out the criteria by which the Council will assess and approve requests for adaptation work, in order to meet the needs of tenants and their families. The Policy explains the eligibility requirements for applying for adaptations and how the Council will assess received applications. The Policy also aims to provide guidance to tenants who wish to install their own adaptations.</p> <p>The Policy has been developed to replace the Council's existing Disabled Adaptations Policy. The new Aids and Adaptations Policy aims to be inclusive of a wider group of tenants so that more tenants can access the adaptations service. This includes tenants who are elderly or frail, or tenants and families that are neurodivergent, rather than limiting the service to disabled tenants only. Other cases where a tenant requires an aid or adaptation to assist them in their day to day living will also be considered.</p> <p>The key objectives of the Policy are for the Council to:</p> <ul style="list-style-type: none"> • Provide appropriate adaptations to its homes where required once an application has been submitted and approved • Communicate regularly with tenants to support them and their families throughout the adaptations process • Work with an Occupational Therapist where required for minor adaptations and for all major adaptations to ensure applications are assessed fairly and equally

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Step 1: Scoping the assessment	
	<ul style="list-style-type: none"> • Secure alternative suitable housing in instances where the Council is unable to provide adaptations or where other landlords are better able to meet specific needs • Refer tenants to Social Services or other agencies when needed, which can provide appropriate support or advice on care services and equipment • Ensure all tenants are treated in a fair, respectful, empathetic and consistent way.
2. Who will be affected by the activity or proposal?	<p>The Policy will affect tenants of Dartford Borough Council.</p>
3. How does the activity or proposal contribute to: a) any key performance indicators? b) policies, values or objectives of Dartford Borough Council?	<p>a) There are no key performance indicators specific to the Aids and Adaptations Policy for Council Tenants. b) The Aids and Adaptations Policy for Council Tenants contributes to the Housing ambitions in the Corporate Plan 2024-2027 to ‘Ensure that our homes are well maintained’ and to ‘Provide a high quality and responsive housing service that’s built on respect for aspiring and existing tenants.’</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>The Aids and Adaptations Policy for Council Tenants and its delivery is intended to be compatible with the following relevant legislation:</p> <ul style="list-style-type: none"> • Housing Act 1985 • Housing, Grants, Construction and Regeneration Act 1996 • Regulatory Reform (Housing Assistance) Order 2002 • Care Act 2014 • Equality Act 2010 <p>There are also specific expectations placed on the Council, as a social housing landlord, by the Regulator of Social Housing as part of the Safety and Quality standard to assist tenants seeking housing adaptations to access the appropriate service. Specific expectations include to:</p> <ul style="list-style-type: none"> • Clearly communicate to tenants and relevant organisations how they will assist tenants seeking housing adaptations services. • Co-operate with tenants, appropriate local authority departments and other relevant organisations so that a housing adaptations service is available to tenants where appropriate. • Allocate homes that are designed or adapted to meet specific needs appropriately.

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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>Dartford population profile</p> <ul style="list-style-type: none"> • Gender – There are slightly more female residents than male residents in Dartford where 51% are female and 49% are male, which is the same as the overall England ratio of females and males. • Age – The median age in Dartford is 37 years, which is slightly lower than the overall England mean age of 40 years. 21.1% of Dartford’s population is aged 14 years or under. This is followed by residents aged 35 to 44 years (15.7%), 25 to 34 years (15.2%), 45 to 54 years (13.3%), 55 to 64 years (10.8%), 15 to 24 years (10.2%), 65 to 74 years (7.4%), and aged 75 years and over (6.4%) • Ethnicity – The largest ethnic group that people in Dartford identify with is White at 74.5%. This is followed by Black, Black British, Black Welsh, Caribbean or African (10.50%), Asian, Asian British or Asian Welsh (9.90%), Mixed or Multiple ethnic groups (3.10%), and Other ethnic groups (2.00%) • Disability – 15.9% of Dartford’s population are disabled. Of this, 6.6% of people’s activities are limited a lot and 9.3% of people’s activities are limited a little. • Religion – 48.1% of Dartford’s population connect or identify with the Christian religion, followed by 3.8% Hindu, 3.5% Muslim, 1.7% Sikh, 0.6% Buddhist, 0.1% Jewish, 0.4% other religion. 36.5% of Dartford’s population did not connect or identify with any religion and 5.3% did not answer this question in the Census. • Sexual orientation – 91.2% of Dartford’s population aged 16 years and over identified as straight or heterosexual. 1.5% described themselves as gay or lesbian. 0.91% described themselves as bisexual. 0.14% described themselves as pansexual; 0.03% described themselves as asexual; 0.00% described themselves as queer. 0.01% described themselves as ‘other sexual orientation’. 6.54% did not answer this question in the Census. <p>(Source: Census 2021, Office for National Statistics)</p> <p>Tenant profile</p> <p>The Council owns and manages a housing stock of 4,216 properties. Information in relation to profile of Council tenants (Tenant 1 data) is captured by the Council’s Housing Service, as follows:</p> <table border="1" data-bbox="658 1187 2116 1401"> <tbody> <tr> <td rowspan="3">Sex</td> <td>Male</td> <td>33.85%</td> </tr> <tr> <td>Female</td> <td>66.03%</td> </tr> <tr> <td>Unknown</td> <td>0.12%</td> </tr> <tr> <td rowspan="3">Age</td> <td>18-24</td> <td>1.59%</td> </tr> <tr> <td>25-39</td> <td>20.41%</td> </tr> <tr> <td>40-59</td> <td>38.22%</td> </tr> </tbody> </table>		Sex	Male	33.85%	Female	66.03%	Unknown	0.12%	Age	18-24	1.59%	25-39	20.41%	40-59	38.22%
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Step 2: Information collection			
		60+	39.78%
	Race	White	67.72%
		Asian or Asian British	1.45%
		Black or Black British	1.47%
		Mixed	2.00%
		Chinese or other ethnic group	0.24%
		Unknown/ prefer not to say	27.12%
	Disability/ vulnerability	No disability/ vulnerability	79.16%
		Disability/ vulnerability	20.84%
6. What consultation has taken place with affected groups? Please describe who was consulted and the key findings	<p>Internal consultation on the draft updated Aids and Adaptations Policy for Council Tenants has been carried out with Council officers.</p> <p>Consultation for Adaptations</p> <p>Tenants will be consulted throughout the adaptations process, where all options will be explored to find the most appropriate solution. For major adaptations and some minor adaptations, an Occupational Therapist will be consulted and will carry out a functional assessment of the needs of the applicant. This may also include working with other health professionals, such as a medical consultant or GP.</p> <p>The outcome will be reported back to tenants in an appropriate and accessible format on whether the Council will fund and carry out adaptations to their home. Carers or family members can also be informed, with the formal consent of the tenant concerned.</p>		
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?	<p>The Council is committed to ensuring the voice of its tenants is heard on matters that affect them. The Regulator of Social Housing places a requirement on social housing landlords to comply with the Transparency, Influence and Accountability Standard 2024, by ensuring that residents are given a wide range of opportunities to influence and be involved in the formulation of their landlord's housing-related policies and strategies. Consultation with Council tenants will be undertaken, as follows:</p> <ol style="list-style-type: none"> 1. All Council tenants will be invited to comment on the draft Aids and Adaptations Policy for Council Tenants. 2. The Dartford Tenants' and Leaseholders' Forum (DTLF) will be invited to comment on the draft Aids and Adaptations Policy for Council Tenants. The DTLF aims to ensure that the services delivered by the Council are accessible to all. The Forum works as a group to ensure that the views and housing needs of residents 		

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Step 2: Information collection	
	<p>are recognised and addressed by the Council, and that those needs and views are placed at the centre of housing services delivery.</p> <p>3. The Housing Advisory Board (HAB) will be invited to comment on the draft Aids and Adaptations Policy for Council Tenants. The HAB considers reports on proposed policy, strategy and performance in relation to housing issues and makes recommendations to Cabinet as appropriate. The HAB includes representation from Council officers, elected Members and DTLF members.</p>

Step 3: Assessing the equality impact	
<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"> • The Initial Screening will have identified which aims of the Public Sector Equality Duty are relevant to the activity or proposal for consideration • For existing activities, consider how they are working in practice for each relevant protected group • For new proposals, consider whether there is anything that could give rise to positive and negative equality impacts for each relevant protected group • If there is no identified equality impact, please tick the 'No Impact' box and explain why in question 9 • If the equality impact is unclear, please tick the 'Unknown' box and explain why in question 9 	

Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
Age	The Policy is not discriminatory against age and the Council recognises that adaptations may be required for a tenant of any age. More elderly tenants may be in need of aids and adaptations to their property due to frailties which make everyday activities difficult to do. However the Council will assess all cases fairly, irrespective		<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
	of age and approve adaptations where required and where the criteria is met.			
Disability	<p>The Policy will have a positive impact on disabled tenants as any aids and adaptations provided will help tenants to live independently and safely in their home.</p> <p>Communication needs In accordance with the Council's Equality & Diversity Document Framework, the Policy and information about adaptations, and the assistance the Council can provide can be provided in alternative formats, including: Braille, audio tape and large print versions of documents. British Sign Language services can also be provided upon request. Calls can also be received via Relay UK.</p>		<input type="checkbox"/>	<input type="checkbox"/>
Sex			<input checked="" type="checkbox"/>	<input type="checkbox"/>
Gender reassignment			<input checked="" type="checkbox"/>	<input type="checkbox"/>
Race	<p>Alternative format and interpreting services In accordance with the Council's Equality & Diversity Document Framework, the Policy and information about adaptations, and the assistance the Council can provide can be provided in alternative formats including documents translated into other languages. Telephone and face-to-face language interpreting services can also be provided upon request.</p>		<input type="checkbox"/>	<input type="checkbox"/>
Religion/Belief			<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
Sexual Orientation			<input checked="" type="checkbox"/>	<input type="checkbox"/>
Pregnancy/Maternity			<input checked="" type="checkbox"/>	<input type="checkbox"/>
Marriage and Civil Partnership*	Not applicable as the Policy does not apply in the context of employment.	Not applicable as the Policy does not apply in the context of employment.	<input 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	
9. If 'no impact' or 'unknown' was selected, please explain	There are no known circumstances where the Policy will have relevance to or a disproportionate equality impact on the protected characteristic groups of sex, gender reassignment, religion/belief, sexual orientation and pregnancy/maternity. All tenants who have adaptations to their homes will be supported by the Council regardless of a tenant's protected characteristics. The Aids and Adaptations Policy for Council Tenants mainly affects older and disabled tenants. The adaptations service will be tailored to meet individual needs so that it is accessible for everyone.
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	<p>The Council will work with an Occupational Therapist prior to delivering any major adaptations and some minor adaptations, who will assess the household situation and recommend if the works are necessary and appropriate based on the applicants requirements. This may also involve working with other health professionals.</p> <p>The Council will also work with its contractors once applications have been approved to carry out the work in the tenant's home.</p>
11. Any other comments	No other comments.

Step 4: Action plan
12. Based on the information in Steps 1 to 3, please list the actions that will be taken to address:

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Step 4: Action plan

- 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
Views from all Council tenants and leaseholders	Invite comment and input on the draft policy from all Council tenants and leaseholders	Feedback will, at a formative stage, inform any further changes that may be required to the draft policy in advance of seeking approval for the policy	November 2024	Details of the consultation and amendments made to the draft policy as a result of the consultation will be included in the Cabinet report	Housing Policy & Performance Officer
Views from the Dartford Tenants' and Leaseholders' Forum on the draft policy	Invite comment and input on the draft policy from the Dartford Tenants' and Leaseholder's Forum	Feedback will, at a formative stage, inform any further changes that may be required to the draft policy in advance of seeking approval for the policy	November 2024	Details of the consultation and amendments made to the draft policy as a result of the consultation will be included in the Cabinet report	Housing Policy & Performance Officer
Views from the Housing Advisory Board	Invite comment and input on the draft policy from the Housing Advisory Board	Feedback will, at a formative stage, inform any further changes that may be required to the draft policy in advance of seeking approval for the policy	January 2025	Details of the consultation and amendments made to the draft policy as a result of the consultation will be included in the Cabinet report	Housing Policy & Performance Officer

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

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Identified impacts (and who is affected)	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
Step 5: Decision making and future monitoring					
13.	Which decision making process does this Customer Access Review need to go through? i.e. who does this need to be approved by?		Head of Legal Services and Director of Housing & Public Protection		
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?		All requests for adaptations will be monitored and considered to ensure the adaptations service is providing the assistance that tenants require. The Council will review its Aids and Adaptations Policy for Council Tenants every three years or earlier to address legislative, regulatory, best practice or operational issues.		
16.	When will you review this Customer Access Review?		New Customer Access Review assessments will be undertaken in conjunction with the review of the policy, or sooner, in the event of major legislative or operational changes.		
Step 6: Final steps					
17.	Once this Customer Access Review has been approved, send this assessment to the Policy & Projects Officer				
18.	Implement the actions identified from this Customer Access Review and ensure progress is monitored and recorded				

Reviewed by Legal Services: 25.10.2024

John Wenham – Solicitor /  Butta Singh HoL & MO

Reviewed by Director of Housing & Public Protection: 24.10.2024

