



## Equality Impact Assessment

|                                                                     |                                                 |
|---------------------------------------------------------------------|-------------------------------------------------|
| Title of Service, Policy, Procedure, Spending Review being Proposed | Housing Assistance Policy 2026                  |
| Name of Service Area                                                | Private Sector Housing<br>Community and Housing |
| Name of Officer completing this assessment                          | Katie Sharp-Fisher                              |
| Date Assessment Started                                             | 30/04/2026                                      |
| Name of Decision Maker (in relation to the change)                  | Executive Committee                             |
| Date Decision Made                                                  | 28/07/2026                                      |

### Please ensure the following:

- That the document is understandable to a reader who has not read any other documents and explains (on its own) how the Public Sector Equality Duty is met. This does not need to be lengthy but must be complete.
- That available support information and data is identified and where it can be found. Also be clear about highlighting gaps in existing data or evidence that you hold, and how you have sought to address these knowledge gaps.
- That the equality impacts are capable of aggregation with those of other EIAs to identify the cumulative impact of all service changes made by the council on different groups of people

## Overview

Provide a clear overview of the aims of the service/policy/procedure and the proposed changes being made. Will the current service users' needs continue to be met? Why is the change being proposed? What needs or duties is it designed to meet?

The Housing Assistance Policy forms part of a Worcestershire-wide aligned approach to the provision of housing assistance, ensuring consistency in the delivery of financial support across the county while allowing for local discretion in response to identified need and available resources. The policy sets out how the Council uses its powers under the Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 to provide financial assistance, including mandatory Disabled Facilities Grants and discretionary support.

The policy also supports delivery of statutory duties and wider housing and health objectives, including reducing hazards under the Housing Act 2004 and supporting hospital discharge and prevention. The aligned approach supports: -

- Consistency of service provision across Worcestershire
- Efficient use of Better Care Fund resources
- Shared learning and best practice
- Equitable access to assistance across geographic areas
- Reducing inequalities in housing conditions and health outcomes

Locally, the policy contributes to:-

- Reducing Category 1 hazards
- Supporting independent living
- Preventing hospital admission and delayed discharge
- Tackling fuel poverty and poor housing conditions
- Supporting vulnerable and low-income households to remain in safe and suitable accommodation

This ensures a consistent and equitable approach to housing assistance across Worcestershire while enabling proportionate responses to local housing conditions and demand.

| Who is the proposal likely to affect? | Yes                                 | No                                  |
|---------------------------------------|-------------------------------------|-------------------------------------|
| All residents                         | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| Specific group(s)                     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| All Council employees                 | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| Specific group(s) of employees        | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| Other – Provide more details below    | <input type="checkbox"/>            | <input type="checkbox"/>            |

## Details

Outline who could be affected and how they could be affected by the proposal/service change. Include current service users and those who could benefit from but do not currently access the service.

The policy affects: -

- Owner-occupiers
- Private tenants
- Landlords (indirectly through conditions and obligations)

It disproportionately benefits:

- Disabled persons (DFGs and adaptations)
- Older persons (age-related needs and hazards)
- Low-income households (repair assistance and fuel poverty support)
- People with health conditions (including dementia and hospital discharge cases)

The policy primarily affects owner-occupiers, private tenants and landlords (indirectly), with a particular focus on vulnerable households. This includes disabled persons, older people, low-income households, individuals with health conditions and those living in poor housing conditions. These groups are more likely to require financial assistance to address hazards, undertake repairs or adapt their homes.

## Evidence and data used to inform your equality impact assessment

What data, research, or trend analysis have you used? Describe how you have got your information and what it tells you.

The assessment is informed by: -

- Local HHSRS data identifying Category 1 and serious Category 2 hazards
- Disabled Facilities Grant demand and delivery trends
- Demographic data (ageing population and disability prevalence)
- Public health evidence linking housing conditions to health outcomes
- Fuel poverty and energy efficiency indicators
- Operational experience of delivering housing assistance

### Key Findings

- Vulnerable groups (disabled, elderly, low-income) are disproportionately affected by poor housing
- Demand for adaptations and repairs is increasing
- Poor housing contributes directly to health inequalities and hospital admissions

### **Data Gaps**

- Limited detailed equality monitoring data on applicants
- Addressed through:
  - National datasets
  - Local intelligence
  - Service experience

In addition to local data, this policy is informed by a Worcestershire-wide evidence base, including: -

- County-level Disabled Facilities Grant demand and delivery data
- Public health data linking housing and health outcomes
- Shared intelligence across district councils and partners

This strengthens the reliability of the evidence used and ensures that the policy reflects both local and strategic housing need.

### **Engagement and Consultation**

What engagement and consultation have you undertaken about the proposal with current service users, potential users and other stakeholders? What is important to them regarding the current service? How does (or could) the service meet their needs? How will they be affected by the proposal? What potential impacts did they identify because of their protected characteristic(s)? Did they identify any potential barriers they may face in accessing services/other opportunities that meet their needs?

Engagement has included: -

- Internal consultation with housing, health and social care partners
- Feedback from the Home Improvement Agency and delivery officers
- Review of casework and service demand patterns

### **Key Themes**

- Need for accessible and supported application processes
- Importance of timely interventions, especially for hospital discharge
- Financial barriers to maintaining safe housing
- Value of flexibility in discretionary assistance

No adverse equality impacts were raised through consultation. Engagement has also taken place at a Worcestershire level, including collaboration with partner authorities, health partners and delivery agencies, ensuring a coordinated and consistent approach to housing assistance across the county.

## Public Sector Equality Duty

Due regard must be given to the three aims of the Equality Duty. This means that you must consciously think about the three aims as part of the process of decision-making. Consider the current service and any proposed changes, thinking about what issues may arise.

| Equality Duty Aims                                                                                                                                                                                                                                                       | Evidence                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>Eliminate unlawful discrimination, harassment and victimisation</b></p> <p>How does the proposal/service ensure that there is no barrier or disproportionate impact for anyone with a particular protected characteristic</p>                                      | <p>The policy:</p> <ul style="list-style-type: none"> <li>• Applies consistent eligibility criteria as determined by legislation (housing grants construction and regeneration act 1996, Housing Act 2004)</li> <li>• Is based on housing need, vulnerability and financial circumstances</li> <li>• Includes safeguards such as case-by-case assessment</li> </ul> <p>No direct or indirect discrimination has been identified.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <p><b>Advance equality of opportunity between different groups</b></p> <p>How does the proposal/service ensure that its intended outcomes promote equality of opportunity for users? Identify inequalities faced by those with specific protected characteristic(s).</p> | <p>The policy actively promotes equality by: -</p> <ul style="list-style-type: none"> <li>• Prioritising disabled persons through mandatory DFG provision</li> <li>• Supporting older people to remain independent</li> <li>• Targeting low-income households unable to maintain safe housing</li> <li>• Providing tailored support (e.g. dementia adaptations, hospital discharge works)</li> </ul> <p>This reduces inequalities in: -</p> <ul style="list-style-type: none"> <li>• Housing conditions</li> <li>• Health outcomes</li> <li>• Access to suitable accommodation</li> </ul> <p>The Worcestershire-wide alignment ensures that residents across the county have access to consistent forms of assistance, reducing the risk of unequal treatment based on geographic location, while still allowing local flexibility to respond to specific needs.</p> |
| <p><b>Foster good relations between different groups</b></p> <p>Does the service contribute to good relations or to broader community</p>                                                                                                                                | <p>The policy contributes to: -</p> <ul style="list-style-type: none"> <li>• Improved community wellbeing</li> <li>• Reduced inequality in housing standards</li> <li>• Support for vulnerable residents to remain within their communities</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

|                                                    |  |
|----------------------------------------------------|--|
| cohesion objectives? How does it achieve this aim? |  |
|----------------------------------------------------|--|

### Is there evidence of actual or potential unfairness for the following equality groups?

- Does the proposal target or exclude a specific equality group or community?
  - Does it affect some equality groups or communities differently and can this be justified?
  - Is the proposal likely to be equally accessed by all equality groups and communities? If not, can this be justified?
- (It may be useful to consider other groups, not included in the Equality Act, especially if the proposal is specifically for them e.g. lone parents, refugees, unemployed people, carers)

### Impact of proposal

Describe the likely impact of the proposal on people because of their protected characteristic and how they may be affected. How likely is it that people with this protected characteristic will be negatively affected? What are the barriers that might make access difficult or stop different groups or communities accessing the proposal? How great will that impact be on their well-being? Could the proposal promote equality and good relations between different groups? How?

### If you have identified any area of actual or potential unfairness that cannot be justified, can you eliminate or minimise this?

What mitigating actions can be taken to reduce or remove this impact? (Include these in the action plan at the end of the assessment) Equal treatment does not always produce equal outcomes; sometimes you will have to take specific steps for particular groups to address an existing disadvantage or to meet differing needs.

| Protected Group | Impact of proposal | Justification for any actual or potential unfairness identified                                                                                                                                    | If you have identified any area of actual or potential unfairness that cannot be justified, can you eliminate or minimise this?                                                                                                                                                                                           |
|-----------------|--------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Age             | Strong Positive    | Policy enables older people to remain in their homes and reduces hazard exposure.<br>Mitigation: assisted application routes. This also reduces risks associated with falls, excess cold and other | The policy does not: <ul style="list-style-type: none"> <li>• Exclude any protected group</li> <li>• Create unjustified barriers</li> </ul> Where differential impacts exist, they are: <ul style="list-style-type: none"> <li>• Justified (targeting need)</li> <li>• Positive (supporting vulnerable groups)</li> </ul> |

|                                |                             |                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                      |
|--------------------------------|-----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                |                             | housing-related hazards that disproportionately affect older persons.                                                                                                                          | The aligned Worcestershire approach reduces the risk of a 'postcode lottery' in access to housing assistance, while local discretion ensures that assistance remains proportionate and responsive to individual circumstances. The policy therefore represents a proportionate and justified approach to targeting assistance based on need while ensuring equitable access across protected groups. |
| Disability                     | Significant Positive        | Core focus of policy (DFGs, dementia support, adaptations). Promotes independence and safety. This directly advances equality of opportunity by removing barriers within the home environment. |                                                                                                                                                                                                                                                                                                                                                                                                      |
| Transgender                    | Neutral                     | No differential impact identified. Access is based on housing need and eligibility criteria, ensuring equitable access.                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                      |
| Marriage and Civil Partnership | Neutral                     | No differential impact identified. Access is based on housing need and eligibility criteria.                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                      |
| Pregnancy and Maternity        | Positive                    | Improved housing conditions benefit families with young children including safer living environments and reduction of hazards within the home.                                                 |                                                                                                                                                                                                                                                                                                                                                                                                      |
| Race                           | Potential indirect negative | Language or cultural barriers may affect access. Mitigation: support via (Worcestershire Home Adaptation Service) and accessible communication. These barriers are mitigated                   |                                                                                                                                                                                                                                                                                                                                                                                                      |

|                    |         |                                                                                                                       |  |
|--------------------|---------|-----------------------------------------------------------------------------------------------------------------------|--|
|                    |         | through supported applications, identification of communication needs and partnership working with delivery agencies. |  |
| Religion or Belief | Neutral | No differential impact identified. Access is based on housing need and eligibility criteria.                          |  |
| Sex (Male/ Female) | Neutral | No differential impact identified. Access is based on housing need and eligibility criteria.                          |  |
| Sexual Orientation | Neutral | No differential impact identified. Access is based on housing need and eligibility criteria.                          |  |

#### How will you monitor any changes identified?

The Council/WHAS (Worcestershire Home Adaptions Service) will:

- Monitor uptake of assistance locally
- Contribute to Worcestershire-wide monitoring and benchmarking
- Review consistency of outcomes across the county
- Identify any disparities in access or outcomes between groups or geographic areas
- Adjust delivery in response to identified inequalities
- Review customer feedback and complaints to identify any barriers to access for protected groups

**The actions required to address these findings are set out below.**

| Action Required                                  | By Whom    | By When | Completion Date |
|--------------------------------------------------|------------|---------|-----------------|
| Ensure assisted application routes are available | WHAS/LAs   | Ongoing |                 |
| Improved accessibility of information            | WHAS/LAs   | Ongoing |                 |
| Monitor equality data and uptake                 | WHAS/LAs s | Annual  |                 |

|                                            |            |         |  |
|--------------------------------------------|------------|---------|--|
| Continue engagement with vulnerable groups | WHAS/LAs s | Ongoing |  |
|--------------------------------------------|------------|---------|--|

| Sign off on completion             | Name               | Signature                                                                           | Date       |
|------------------------------------|--------------------|-------------------------------------------------------------------------------------|------------|
| Lead Officer completing assessment | Katie Sharp-Fisher |  | 30/04/2026 |
| Equality Officer                   |                    |                                                                                     |            |

**When you have completed this assessment, retain a copy and send an electronic copy to the Policy Team (Equalities) attaching any supporting evidence used to carry out the assessment.**