

Integrated Impact Assessment (IIA)

This Integrated Impact Assessment considers the duties and requirements of the following legislation in order to inform and ensure effective decision making and compliance:

- Equality Act 2010
- Welsh Language Standards (No.1) Regulations 2015
- Well-being of Future Generations (Wales) Act 2015
- Environment (Wales) Act 2016

Version Control

Version	Author	Job title	Date
Version 1	Chelé Zandra Howard	Head of Housing & Communities	19/08/24
	Rob Davies	PO Housing Renewal and Adaptation Service	

1. Details of the initiative

	Title of the Initiative: Disabled Facilities Grant (DFG) Options Appraisal
1a	Service Area: Housing Renewal and Adaptation Service
1b	Directorate: Social Services, Health & Housing
1c	<p>Summary of the initiative: To introduce measures to help reduce waiting times for DFGs and to fund essentials works over the £36k DFG limit:</p> <p>Proposal 1 – To reintroduce the means test for small and medium DFGs</p> <p>Proposal 2 – To introduce a £10k ‘top-up’ grant for works that cost in excess of the current DFG limit of £36k.</p>
1d	Is this a ‘strategic decision’? Yes

1e	<p>Who will be directly affected by this initiative?</p> <p>These proposals would directly impact on those that are assessed as requiring adaptations to their home due to their disability and may also indirectly impact on unpaid carers who support those that require an adaptation to their home.</p>
1f	<p>When and how were people consulted?</p> <p>Proposal 1 - The proposal to reinstate a means test will require public consultation, as such it is proposed that Officers undertake a 6 week consultation before a final recommendation is made.</p> <p>Proposal 2 - The proposal to implement a £10k 'top-up' is based on data and feedback from people who have been assessed for a DFG, which shows that some people are unable to go forward with essential adaptations as they are unable to fund the excess costs of works.</p>
1g	<p>What were the outcomes of the consultation?</p> <p>Proposal 1 - TBC – The impact assessment will be updated following a consultation process.</p> <p>Proposal 2 – People with a disability are unable to obtain adaptations in line with their occupational therapy assessment due to the costs of some works being in excess of the DFG limit.</p>

2. Evidence

<p>What evidence was used in assessing the initiative?</p>
<p>Data in respect of DFG applications and waiting lists.</p>

3. Equalities

a) How does the initiative impact on people who share a **protected characteristic**?

Protected Characteristic	+	-	+/-	Why will it have this impact?
Age	x			<p>A significant number of people who apply for a DFG will have a protected characteristic due to their age, as these adaptations often support those aged 60+ that have age related frailty/disability. Our Data shows that 84% of applicants are over the age of 60.</p> <p>Whilst there is no recorded data, it is reasonable to assume that many carers will also have a protected characteristic due to their age, as often those with age related frailty/disability will be supported by their partner/spouse.</p> <p><u>Proposal 1</u> – Reinstating the means test will mean that in the future, people who have the financial ability to fund small & medium works will no longer be eligible to access a DFG and would be required to fund the works themselves.</p> <p>Whilst this results in some people no longer having access to the grant, these people will be assessed as having the financial means to fund the works without the need of a grant. This will then allow the available funding to be directed towards those that do not have the financial means to fund these works and will result in shorter waiting times for those people to receive the grant/works.</p> <p>As such, on balance, the proposal will have a positive impact on those that are most in need of a DFG and their carers, as the available resource will be better targeted to those most in need of a DFG, resulting in more people that are identified as both physically and financially requiring a DFG in obtaining these key adaptations more quickly. Promptly accessing adaptations is essential in helping to prevent people from requiring statutory support services, reduce hospital and care home admissions and help with timely hospital discharge.</p>

			<p>Those that have made a formal application for small and medium works before the proposal is implemented will not be impacted as their applications will be honoured.</p> <p><u>Proposal 2</u> – This should have a positive impact on those with this protected characteristic (both the person receiving a DFG and their unpaid carer), some essential adaptations cost in excess of the £36k limit and so this ‘top-up’ will enable more people to have access to more expensive works in line with their occupational therapy assessment.</p>
Disability	x		<p>The nature of a DFG means that all applicants will have a disability.</p> <p>Proposal 1 – Reinstating the means test will mean that in the future, people who have the financial ability to fund small & medium works will no longer be eligible to access a DFG and would be required to fund the works themselves.</p> <p>Whilst this results in some people no longer having access to the grant, these people will be assessed as having the financial means to fund the works without the need of a grant. This will then allow the available funding to be directed towards those that do not have the financial means to fund these works and will result in shorter waiting times for those people to receive the grant/works.</p> <p>As such, on balance, the proposal will have a positive impact on those that are most in need of a DFG and their carers, as the available resource will be better targeted to those most in need of a DFG, resulting in more people that are identified as both physically and financially requiring a DFG in obtaining these key adaptations more quickly. Promptly accessing adaptations is essential in helping to prevent people from requiring statutory support services, reduce hospital and care home admissions and help with timely hospital discharge.</p>

			<p>Those that have made a formal application for small and medium works before the proposal is implemented will not be impacted as their applications will be honoured.</p> <p><u>Proposal 2</u> – This should have a positive impact on those with this protected characteristic (both the person receiving a DFG and their unpaid carer), some essential adaptations cost in excess of the £36k limit and so this ‘top-up’ will enable more people to have access to more expensive works in line with their occupational therapy assessment.</p>
Gender reassignment		x	<p>There is no data/information to suggest that those with this protected characteristic would be disproportionately impacted or subject to direct or indirect discrimination as a result of the proposals.</p> <p>This is because eligibility for a DFG is based on a person’s individual assessment of need by an Occupational Therapist in order to support those with a disability to live more independently at home and the proposal to reinstate the means test is focused on a person’s financial ability to fund the works they require.</p>
Marriage & civil partnership	x		<p>Whilst there is no recorded data, it is reasonable to assume that many informal carers will have this protected characteristic as many people provide informal care to their partner/spouse.</p> <p><u>Proposal 1</u> – Reinstating the means test will mean that in the future, people who have the financial ability to fund small & medium works will no longer be eligible to access a DFG and would be required to fund the works themselves.</p> <p>Whilst this results in some people no longer having access to the grant, these people will be assessed as having the financial means to fund the works without the need of a grant. This will then allow the available funding to be directed towards those that do not have the financial means to fund these works and will result in shorter waiting times for those people to receive the grant/works.</p>

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Pregnancy and maternity		x	<p>There is no data/information to suggest that those with this protected characteristic would be disproportionately impacted or subject to direct or indirect discrimination as a result of the proposals.</p> <p>This is because eligibility for a DFG is based on a person’s individual assessment of need by an Occupational Therapist in order to support those with a disability to live more independently at home and the proposal to reinstate the means test is focused on a person’s financial ability to fund the works they require.</p>
Race		x	<p>There is no data/information to suggest that those with this protected characteristic would be disproportionately impacted or subject to direct or indirect discrimination as a result of the proposals.</p> <p>This is because eligibility for a DFG is based on a person’s individual assessment of need by an Occupational Therapist in order to support those with a disability to live</p>

			more independently at home and the proposal to reinstate the means test is focused on a person's financial ability to fund the works they require.
Religion or belief		x	<p>There is no data/information to suggest that those with this protected characteristic would be disproportionately impacted or subject to direct or indirect discrimination as a result of the proposals.</p> <p>This is because eligibility for a DFG is based on a person's individual assessment of need by an Occupational Therapist in order to support those with a disability to live more independently at home and the proposal to reinstate the means test is focused on a person's financial ability to fund the works they require.</p>
Sex		x	<p>43% of applicants are male and 57% are female, as such any changes will impact slightly more on females than males.</p> <p><u>Proposal 1</u> – Reinstating the means test will mean that in the future, people who have the financial ability to fund small & medium works will no longer be eligible to access a DFG and would be required to fund the works themselves.</p> <p>Whilst this results in some people no longer having access to the grant, these people will be assessed as having the financial means to fund the works without the need of a grant. This will then allow the available funding to be directed towards those that do not have the financial means to fund these works and will result in shorter waiting times for those people to receive the grant/works.</p> <p>As such, on balance, the proposal will have a positive impact on those that are most in need of a DFG and their carers, as the available resource will be better targeted to those most in need of a DFG, resulting in more people that are identified as both physically and financially requiring a DFG in obtaining these key adaptations more quickly. Promptly accessing adaptations is essential in helping to prevent people from requiring statutory support services, reduce hospital and care home admissions and help with timely hospital discharge.</p>

			<p>Those that have made a formal application for small and medium works before the proposal is implemented will not be impacted as their applications will be honoured.</p> <p><u>Proposal 2</u> – This should have a positive impact on those with this protected characteristic (both the person receiving a DFG and their unpaid carer), some essential adaptations cost in excess of the £36k limit and so this ‘top-up’ will enable more people to have access to more expensive works in line with their occupational therapy assessment.</p>
Sexual orientation		x	<p>There is no data/information to suggest that those with this protected characteristic would be disproportionately impacted or subject to direct or indirect discrimination as a result of the proposals.</p> <p>This is because eligibility for a DFG is based on a person’s individual assessment of need by an Occupational Therapist in order to support those with a disability to live more independently at home and the proposal to reinstate the means test is focused on a person’s financial ability to fund the works they require.</p>

What action will be taken to improve positive or mitigate negative impacts?

No further actions required as the purpose of the proposals is to support those most in need of a DFG to access the works they require more promptly.

b) How will the initiative assist or inhibit the ability to meet the **Public Sector Equality Duty**?

Public Sector Equality Duty (PSED)	+	-	+/-	Why will it have this impact?
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To eliminate discrimination, harassment and victimisation	x			<p>DFGs fund essential works for people with a disability, so that they are able to remain living in their homes. Enabling those most in need to quickly access a DFG will advance equality of opportunity between those who have and do not have a disability and those who can and those who cannot afford to undertake home adaptations.</p> <p>In addition, supporting people with a disability to remain members of their communities will support good community cohesion, thereby helping to eliminate discrimination/harassment/victimisation and help to foster good relations between different groups.</p>
To advance equality of opportunity between different groups	x			
To foster good relations between different groups	x			

What action will be taken to improve positive or mitigate negative impacts?

No further actions required as the purpose of the proposals is to support those most in need of a DFG to access the works they require more promptly.

4. Socio Economic Duty

Impact	Details of the impact/advantage/disadvantage
Positive/Advantage	<p>Proposal 1 - Will have a positive socio-economic impact as it will enable people with a disability that are unable to afford essential adaptations to their homes to access a DFG grant more quickly. Promptly accessing adaptations is essential in helping to prevent people from requiring statutory support services, reduce hospital and care home admissions and help with timely hospital discharge.</p>

	Proposal 2 – Will have a positive socio-economic impact as it will enable those people that need more costly adaptations to be able to obtain the works required. This will enable more people to remain living in their own homes and also help to reduce the need for statutory support services.
Negative/Disadvantage	
Neutral	

What action will be taken to reduce inequality of outcome

No further actions required as the purpose of the proposals is to support those most in need of a DFG to access the works they require more promptly.

5. Community Cohesion/Social Exclusion/Poverty

	+	-	+/-	Why will it have this impact?
Community Cohesion	x			Supporting people with a disability to remain living in their own homes and communities through the prompt provision of a DFG will support good community cohesion. For example, adaptations such as a ramp and hand rails will help prevent people from becoming 'housebound' and help them to remain active members of their community.
Social Exclusion	x			Supporting people with a disability to remain living in their own homes and communities through the prompt provision of a DFG will help to prevent social exclusion. For example, adaptations such as a ramp and hand rails will help prevent

				people from becoming 'housebound' and help them to remain active members of their community.
Poverty	x			These proposals will enable those that are unable to afford adaptations to their homes access DFGs more promptly, which will have a positive impact on those affected by poverty. Whilst the reintroduction of a means test will have a financial impact on those that are no longer eligible for a DFG, those that are assessed as ineligible will have the financial means to fund the necessary works.

What action will be taken to improve positive or mitigate negative impacts?

No further actions required as the purpose of the proposals is to support those most in need of a DFG to access the works they require more promptly.

6. Welsh

	+	-	+/-	Why will it have this effect?
What effect does the initiative have on:				
- people's opportunities to use the Welsh language			x	There is no change to the application process which is in line with the Councils commitment to the Welsh Language.
- treating the Welsh and English languages equally			x	There may be an indirect positive impact on the Welsh Language duty in respect of DGFs enabling Welsh Speakers to remain living in their own homes and thereby remain members of their local Welsh speaking communities.

What action will be taken to improve positive or mitigate negative impacts?

No further actions required as the purpose of the proposals is to support those most in need of a DFG to access the works they require more promptly.

7. Biodiversity

How will the initiative assist or inhibit the ability to meet the **Biodiversity Duty**?

Biodiversity Duty	+	-	+/-	Why will it have this impact?
To maintain and enhance biodiversity			x	The proposals are unlikely to have any impact on the Councils biodiversity duty.
To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.			x	

What action will be taken to improve positive or mitigate negative impacts?

No further actions required.

8. Well-being of Future Generations

How have the five ways of working been applied in the development of the initiative?

Ways of Working	Details
i. Long term – looking at least 10 years (and up to 25 years) ahead	These proposals help to ensure that the available funding is targeted to those most in need of a DFG so that people with a disability are able to access adaptations that are essential to promoting their long term independence.
ii. Prevention – preventing problems occurring or getting worse	DFGs play an essential role in preventing people from requiring statutory support services and enabling people to live safely within their home.
iii. Collaboration – working with other services internal or external	The adaptation service works very closely with the Occupational Therapist team with the OTs providing the recommendations of what the applicant requires, the service also works very closely with the third sector organisation Care & Repair ,who deliver all the small grants such as handrails and grabrails and steps.

iv. Involvement – involving people, ensuring they reflect the diversity of the population	DFGs are provided in order to help people undertake key adaptations to their home in line with their personal needs that have been assessed by the Occupational Therapist. These assessments are person centred and strength based in order to help people achieve the outcomes that matter to them.
v. Integration – making connections to maximise contribution to:	
Council’s well-being objectives	Supports Well-being Objective 2 - All communities are thriving and sustainable by supporting people to remain living more independently in their own homes and communities.
Other public bodies objectives	DFGs helps to reduce demand for statutory social care support services and helps to reduce hospital admissions, alongside promoting prompt hospital discharge.

9. Monitoring Arrangements

Provide information on the monitoring arrangements to:

Monitor the impact of the initiative on Equalities, Community Cohesion, the Welsh Measure, Biodiversity Duty and the Wellbeing Objectives.

Quarterly KPIs to monitor waiting times, number of works completed and number of adaptations over the £36k limit (e.g. extensions) will help to identify the impact of the proposals. Complaints will also be analysed to understand any unintended negative impacts.

10. Assessment Conclusions

Please provide details of the conclusions reached in relation to each element of the assessment:

	Conclusion
Equalities	Justification - On balance, the proposal will have a positive impact on those that are most in need of a DFG and their carers, as the available resource will be better targeted to those most in need of a DFG, resulting in more people that are identified as both physically and financially requiring a DFG in obtaining these key adaptations more quickly. Promptly accessing adaptations is essential in helping to prevent people from requiring statutory support services, reduce hospital and care home admissions and help with timely hospital discharge.
Socio Economic Disadvantage	Positive Impact
Community Cohesion/ Social Exclusion/Poverty	Positive Impact
Welsh	Neutral/Positive Impact
Biodiversity	N/A
Well-being of Future Generations	Positive Impact

Overall Conclusion

Please indicate the conclusion reached:

Justification - for continuing with the initiative even though there is a potential for negative impacts or missed opportunities

Please provide details of the overall conclusion reached in relation to the initiative

Proposal 1 - may have a negative impact on those disabled people that would no longer be able to access a DFG for small & medium works due to the reintroduction of the means test, as they would need to self-fund their adaptations. However, those excluded from accessing a DFG will be assessed as having the financial ability to fund small and medium works and this needs to be balanced with the positive impact this proposal will have on those disabled people that do not have the financial means to fund home adaptations.

Our data shows that waiting times for adaptation works has notably increased, one of the main reasons for this is due to the significantly increased demand for DFGs following the removal of the means test for small and medium works. This increased demand is resulting in disabled people that do not have the financial means to undertake the necessary adaptations waiting for extended periods of time. Extended waiting times for these works can have a negative impact on a persons independence and can result in the person requiring statutory care services or no longer being able to remain in their home.

As such, on balance, the proposal will have a positive impact on those that are most in need of a DFG and their carers, as the available resource will be better targeted to those most in need of a DFG, resulting in more people that are identified as both physically and financially requiring a DFG in obtaining these key adaptations more quickly. Promptly accessing adaptations is essential in helping to prevent people from requiring statutory support services, reduce hospital and care home admissions and help with timely hospital discharge.

Proposal 2 – will have a positive impact on those people with a disability that require more costly works to remain living safely and independently in their homes.

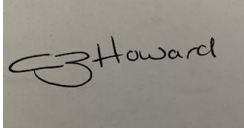
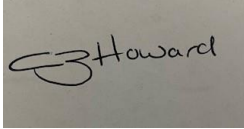
11. Actions

What actions are required in relation to obtaining further data/information, to reduce or remove negative impacts or improve positive impacts?

Action	Who will be responsible for seeing it is done?	When will it be done by?	How will we know we have achieved our objective?
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Undertake 6 week consultation in respect of the reintroduction of a means test	Rob Davies	Before final policy is presented to Cabinet for decision.	Feedback from consultation informs decision making.
Quarterly KPIs for waiting times, number of works over £36k and number of works completed	Rob Davies	Quarterly	Reduction for waiting times Increased number of works completed and Increased number of works costing over £36k

12. Sign off

	Name	Position	Signature	Date
Completed by	Chelé Zandra Howard	Head of Housing & Communities		19/08/24
Signed off by	Chelé Zandra Howard	Head of Service		19/08/24