Agenda Item No:	7	Fenland
Committee:	Cabinet	CAMBRIDGESHIRE
Date:	24 March 2025	
Report Title:	County-wide Housing Adaptatio	ns and Repairs Policy

#### **Cover sheet:**

## 1 Purpose / Summary

1.1 To consider revisions to the existing County-wide Disabled Facilities Grants and Housing Repairs Policy as an outcome of the 2024 review of Disabled Facilities Grants which help support wider health and social care outcomes.

## 2 Key Issues.

- 2.1 The Council has the statutory responsibility for delivering Disabled Facilities Grants to vulnerable residents living in Fenland.
- 2.2 Funding is through a capital allocation from central government.
- 2.3 In 2014, the Government pooled this budget with other budgets in Health and Social Care at a Cambridgeshire level and called it the Better Care Fund (BCF) to prevent avoidable hospital admissions, increase the speed of hospital discharge and keep vulnerable residents living in their homes.
- 2.4 Guidance from the BCF makes it clear that the funding should be used flexibly to meet the needs of vulnerable residents and improve health and social care outcomes.
- 2.5 In 2019, FDC approved a Cambridgeshire wide Housing adaptations policy to ensure the BCF allocation could be utilised in accordance with the review outcomes, BCF guidance and best practice guidance from Foundations (The National Body for Home Improvement Agencies (HIAs), Handyperson Services and the Disabled Facilities Grant in England).
- 2.6 From this a new County-wide policy, a plan was implemented to embed a consistent approach to delivery across Cambridgeshire.
- 2.7 It has now been five years since the policy was first introduced and a year long review has now been undertaken consisting of a project team in which Fenland has had Officer representation and been working on development of a revised County-wide policy which is set out in Appendix A.
- 2.8 In 2024/25 the BCF allocation for Disabled Facilities Grants funding in Fenland was £1,325,000.
- 2.9 Appendix B has a useful summary of the policy and the types of assistance available.
- 2.10 Key organisations and support partners have had the chance to comment and contribute to the policy development.

- 2.11 Key changes from the 2019 policy include:
  - a) Raising the amount to discretionary "Top up" loans above the mandatory maximum for DFG's to £30,000, meaning £60,000.00 is now available for larger scale projects.
  - b) Raising the maximum amount of discretionary grant from £10,000.00 to £25,000.00 and introducing a part loan repayment charge secured against the property, where high value works are funded. Grant will be given to fund to works up to £15,000.00 with any balance over this figure being given as a repayable loan.

#### 3 Recommendations

3.1 It is recommended that Cabinet:

Approve the County-wide Housing Adaptations and Repairs Policy (attached as appendix A)

Wards Affected	All
Forward Plan Reference	[Insert Reference No. From Forward Plan. (It is a legal requirement to include key executive decisions on the forward plan for 28 days before the decision requested in this report is taken).
Portfolio Holder(s)	Councillor Sam Hoy – Portfolio Holder for Housing
Report Originator(s)	Steve Hammond – Private Sector Housing Officer
Contact Officer(s)	Dan Horn – Assistant Director Sarah Gove – Housing & Communities Manager Carol Pilson – Corporate Director
Background Papers	

#### 4 BACKGROUND AND INTENDED OUTCOMES

- 4.1 The Council has the statutory responsibility for delivering Disabled Facilities Grants to vulnerable residents living in Fenland.
- 4.2 Funding is through a capital allocation from central government.
- 4.3 In 2014, the Government pooled this budget with other budgets in Health and Social Care at a Cambridgeshire level and called it the Better Care Fund (BCF) to prevent avoidable hospital admissions, increase the speed of hospital discharge and keep vulnerable residents living in their homes.
- 4.4 Guidance from the BCF makes it clear that the funding should be used flexibly to meet the needs of vulnerable residents and improve health and social care outcomes.

- 4.5 The BCF governance structure commenced a review across the County which Fenland District Council participated in. Three findings emerged:
  - a) New services are needed that consider people's needs in context including early conversations and planning for the long term. This supports taking action earlier at a lower cost and to help the resident with their health and well-being.
  - b) Existing services will need to adapt to support a growing population that are living longer placing a need for flexibility in the approach services can take to keep residents in their own home safely
  - c) Funding arrangements across the system will need to change to support a shift in focus to intervene earlier and prevent the need for higher cost health and social care services on an ongoing basis.

#### 5 REASONS FOR RECOMMENDATIONS

- 5.1 In 2019, FDC approved to a Cambridgeshire wide Housing adaptations policy to ensure the BCF allocation could be utilised in accordance with the review outcomes, BCF guidance and best practice guidance from Foundations (The (National Body for Home Improvement Agencies (HIAs), Handyperson Services and the Disabled Facilities Grant in England).
- 5.2 From this a new County-wide policy a plan was implemented to embed a consistent approach to delivery across Cambridgeshire.
- 5.3 In 2024/25 the BCF allocation for Disabled Facilities Grants funding in Fenland was £1,325,000.
- 5.4 Appendix B has a useful summary of the policy and the types of assistance available.
- 5.5 It has now been five years since the policy was first introduced and a new year long review has now been undertaken consisting of a project team in which Fenland has had Officer representation and been working on development of a revised County-wide policy which is set out in Appendix A.
- 5.6 There are 2 substantive changes from the 2019 policy.
- 5.7 Change 1 is raising the amount to discretionary "Top up" loans above the mandatory maximum for DFG's to £30,000, meaning £60,000.00 is now available for larger scale projects. Reasons:
  - The maximum Disabled Facility Grant award is currently £30,000. This limit hasn't changed since 2005.
  - Inflation in building cost since then now mean that the £30K maximum grant is no longer sufficient to fund major works, predominantly as extensions for disabled children.
  - This was recognised in the 2019 policy, so Councils introduced discretionary DFG "top up" funding above the £30K - subject to funds being available.
  - The 2019 policy allowed Fenland to introduce a £15K max "top up" funding to help grant applicants fund larger schemes.

- Since Covid, building costs have risen dramatically and the £30K DFG & £15K" top up" is in many cases no longer sufficient to fund major works.
- The new 2024 policy is proposing to raise the "top up" funding to £30K which with the maximum DFG, will mean £60K of potential funding available subject to funds being available.
- 5.8 Raising the maximum amount of discretionary grant from £10,000.00 to £25,000.00 and introducing a part loan repayment charge secured against the property, where high value works are funded. Grant will be given to fund to works up to £15,000.00 with any balance over this figure being given as a repayable loan. Reasons:
  - Since the 2019 policy was introduced, Fenland has funded some major high cost improvement and repairs work through its discretionary grant scheme.
  - There have been many cases were the £10K grant limit has been breached due to the complexities of the householders circumstances through a discretionary grant.
  - Under the 2019 policy, all additional works have been funded via a discretionary grant, so no grant monies have been repayable upon sale of the property.
  - Under the proposed 2024 policy, where costs exceed £10K, this amount will be funded via a discretionary loan which will be repayable upon sale of the property.
  - For instance, where the estimated cost of works is £15K, £10K will be funded via grant and £5K funded via discretionary loan.
  - o A similar arrangement is presently in place for DFGs.
  - The loan will be registered on the Local Land Charges Register and will not attract any interest or fees.
  - Officers expect the vast majority of cases still to be funded under the £10K limit, so there will be no material change for the majority of grant applicants.
  - Only the exceptional, high cost cases will be affected by this proposed change.

#### 6 CONSULTATION

6.1 Key organisations and support partners have had the chance to comment and contribute to the policy development

#### 7 ALTERNATIVE OPTIONS CONSIDERED

7.1 It is felt not making the changes restricts the policy's impact in terms of balancing meeting the needs of vulnerable households with utilising public funds in a proportionate way to support Better Care Fund outcomes.

#### 8 IMPLICATIONS

#### 8.1 Legal Implications:

- 8.2 The Council have procured East Cambridgeshire District Council Home Improvement Agency to manage the process of the adaptations to households with FDC approving and managing each application and the use of the Better Care Fund allocation
  - The fund is audited annually to ensure the Council utilises the fund in accordance with the requirements of both the policy and the Better Care Funding grant determination.

## 8.3 Financial Implications:

8.4 The finance is through the Better Care Fund allocation the Council receives on an annual basis from Central Government.

## 8.5 Equality Implications:

Set out in Equality Impact Assessment at Appendix C

## 7 SCHEDULES

Appendix A – Revised County-wide Housing Adaptations and Repairs Policy

Appendix B – Summary of the policy and the types of assistance available.

**Appendix C – Equality Impact Assessment** 





## Cambridgeshire Housing Adaptations, Repairs and Renewals Policy 2025-2030

FOR RESIDENTS LIVING IN EAST CAMBRIDGESHIRE AND FENLAND DISTRICT COUNCIL AREAS

Consultation Draft November 2024, to take effect from April 2025

(SEPARATE VERSIONS OF THIS POLICY ARE AVAILABLE FOR RESIDENTS OF CAMBRIDGE CITY, HUNTINGDONSHIRE AND SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL AREAS. THEIR VERSIONS OF THE POLICY ARE LARGELY THE SAME AS THIS ONE, BUT WITH SOME SLIGHT DIFFERENCES).

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## PART 1: INTRODUCTION

## 1.1 Purpose and objectives of the policy

This Housing Adaptations, Repairs and Renewal policy shows:

- a) How the five district councils across Cambridgeshire will approach provision of home adaptations and repairs for people living in their areas, to help them to live safely and independently at home.
- b) More specifically, how the policy will apply in East Cambridgeshire and Fenland District Council areas. (Cambridge City, Huntingdonshire and South Cambridgeshire District Councils have their own versions of this policy).

It aims to provide, as far as possible, a consistent approach across the five districts, subject to local demand and funding available. However, it does not cover the Peterborough City Council area which has its own Housing Renewal Policy.

The policy outlines the interventions which the councils have agreed may be funded through the Disabled Facilities Grant Capital Allocation paid to them through the Department of Health's Better Care Fund, and through any other capital funds the councils may have allocated to meet the objectives of the policy.

The policy is aimed at those on low incomes and recognises the important role of housing in promoting physical and mental health and wellbeing. The key objectives of the policy are:

- To support individuals' choices around living healthily, safely and independently at home.
- To help prevent hospital, care home or residential school admission.
- To facilitate patients being discharged from hospital and enabling them to live safely and independently at home, including making it easier for carers to provide support.
- To prevent the need for higher expenditure elsewhere in the health and/or social care system.
- To improve housing conditions and remove hazards in the home (i.e. Category 1 Hazards under the Health and Safety Rating System).

The policy, which replaces the previous policy adopted in 2019, is set within the context of relevant national legislation, regulation, policy and guidance (see Appendix 2).

A summary version of this policy is also available, and a paper version of the policy can be provided on request.

#### 1.2 Background

The Regulatory Reform Order 2002 (Housing Renewal) gives local authorities a general power to introduce policies for assisting individuals with renewals, repairs and adaptations in their homes through the provision of grants or loans for works that can be treated as capital expenditure. A formally adopted policy must be in place if assistance is to be offered.

This policy covers how Disabled Facilities Grants, which the district councils have a statutory duty to provide to those who need them, will be awarded. It also forms all or part of each of the

councils' Regulatory Reform Order Repair and Renewal policies, as well as any other housing renewal assistance which may be offered by individual councils on a discretionary basis.

It aims to support a range of other policies and plans and priorities, including:

- The national Better Care Fund programme, which aims to "support local systems to successfully deliver the integration of health and social care in a way that supports person-centred care, sustainability and better outcomes for people and carers."
- The Cambridgeshire and Peterborough Health and Wellbeing Integrated Care Strategy objective of "reducing poverty through better housing, employment and skills" through "improving the quality of housing to enable health and wellbeing resilience", and "supporting mental health in... existing homes".
- The district councils' Housing and Homelessness and Rough Sleeping Strategies.
- Meeting of needs identified through the <u>Cambridgeshire Joint Strategic Needs</u>
   <u>Assessment 2023.</u> (www.cambridgeshireinsight.org webpage, opens in new window)
- The councils' duties around tackling hazards in the home.
- The councils' duties and priorities around promoting equality and financial inclusion.
- Cambridgeshire County Council's Business Plan.
- Having due regard to the Armed Forces Covenant when allocating Disabled Facilities Grants.

The policy also aligns with specific strategies and policies of East Cambridgeshire and Fenland District Councils, including:

- East Cambridgeshire District Council's Corporate Plan and Objectives (eastcambs.gov.uk webpage, opens in new window)
- Fenland District Council's Business Plan (fenland.gov.uk pdf, opens in new window)
- East Cambridgeshire District Council's Equality and Diversity Policy (eastcambs.gov.uk webpage, opens in new window)
- Fenland District Council's Comprehensive Equal Opportunities Policy (fenland.gov.uk pdf, opens in new window)
- East Cambridgeshire District Council's housing policies (eastcambs.gov.uk webpage, opens in new window)
- Fenland District Council's Housing Enforcement Policy (fenland.gov.uk pdf, opens in new window)

Housing adaptations and repairs are part of a range of interventions helping people to live safely and independently at home. These include, for example, reablement services, provision of assistive technology/technology-enabled care and other daily living equipment, and the Cambridgeshire Handyperson Service.

The policy recognises that in order to achieve better outcomes for people, and to make best use of the limited resources available, providing repairs and adaptations in the home in which someone is currently living will not always be the best solution. It needs to be implemented in the context of considering people's wider housing options. Independent advice and information on alternative housing options – for example sheltered or extra care housing or moving to a more suitable home – will, where appropriate, be made available at an early stage. This is particularly important where someone's home is unlikely to remain suitable in the longer term.

Further information on Cambridgeshire's approach to considering applicants' wider housing options is at <u>Appendix 1</u>. Examples of evidence to support this policy are shown in <u>Appendix 2</u>.

This revised policy will take effect from April 2025.

## 1.3 Capital resources

Disabled Facilities Grant funding is capital funding and cannot generally be used for revenue funding purposes. Examples of what may or may not count as capital expenditure are included in Appendix A of the national Disabled Facilities Grant Guidance published in 2022, but the decision on whether an intervention can be treated as capital expenditure is ultimately down to the council concerned.

The amount of Government funding which each of the district councils is allocated each year for Disabled Facilities Grants is calculated based on a national formula. The formula has not been reviewed for some years, so does not necessarily fully reflect the profile and the changing needs of the area. As a result, for some councils the allocation is insufficient to meet demand for mandatory Disabled Facilities Grants, with those councils having to provide additional funding to meet their statutory responsibilities.

Where there is sufficient government funding available to meet demand for mandatory Disabled Facilities Grants in the district, councils may choose to fund additional discretionary works through this policy. Funding may come ether from separate funds; or from their Disable Facilities Grant allocation, provided that assistance is awarded in line with Better Care Fund principles, Integrated Care System priorities, and national legislation, regulation and guidance in place at the time.

This policy aims to make best use of the limited resources available to meet our key objectives.

## 1.4 The role of the Home Improvement Agency

Home Improvement Agencies have an important part to play in providing advice, support and assistance to older and disabled people and those on low incomes who need to adapt, repair, improve or maintain their homes to meet their changing needs.

The East Cambridgeshire and Fenland District Council Home Improvement Agency is a shared council service operating across both areas. The Home Improvement Agency will assist people to apply for grants and loans, will design and organise works, obtain quotes, supervise the works on site and provide the administrative support needed to help applicants to live independently at home.

The Home Improvement Agency may also carry out works covered by this policy for those not eligible for or claiming financial assistance.

Staff at the Home Improvement Agency work closely with district council officers, occupational therapists and other professionals. They may also act as qualified trusted assessors, carrying out some assessments on behalf of the occupational therapy service, or for those clients who are self-funding simple adaptations.

As a discretionary service, the Home Improvement Agency reserves the right not to offer advice, support and/or assistance in exceptional circumstances.

## PART 2: ASSISTANCE AVAILABLE

### 2.1 Disabled Facilities Grant (mandatory grant)

Mandatory Disabled Facility Grants are available to eligible people with disabilities living in the district, to enable disabled adaptations to the home.

The council will award mandatory Disabled Facilities Grants (DFGs) in accordance with up-to-date government legislation and guidance, which determines amongst other things: the maximum amount of grant payable; the type of work that can be funded; and the test of financial resources that must be applied to determine the contribution, if any, to be made by the applicant.

<u>See Appendix 3</u> for more details on Disabled Facilities Grants. Further information is available on request.

The Care Act also includes duties for Cambridgeshire County Council to provide minor equipment and adaptations up to a value of £1,000 free of charge, where there is an assessed need. A county-wide Handyperson service also plays a role in providing minor adaptations and repairs where required. These are outside the scope of this policy.

#### 2.1.1 Eligibility

Occupiers of all types and tenures of residential properties are eligible to apply. This also includes park homes and houseboats, and eligibility extends to a range of licensees, including agricultural workers and service employees.

Disabled Facilities Grants will not be made available to those living in residential care homes; or where specialist equipment/adaptations form part of a supported living group home where it is considered to be the landlord's responsibility to keep the equipment/adaptations in good repair or to provide replacements.

Applications for grant assistance on a dwelling owned by a trust will be considered on a case-by-case basis.

Council tenants should apply, in the first instance, to the relevant council's housing adaptations service. A different application process will apply. See <u>part 3.1</u> below for contact details.

In assessing whether an applicant is eligible for a Disabled Facilities Grant, the council or Home Improvement Agency will consult with Social Services, and other agencies as appropriate.

Applications for Disabled Facilities Grants for adults will normally be subject to a household means test to assess income and savings levels, using the national Financial Test of Resources, unless they are on a qualifying benefit. (See Appendix 4 for more detail). No means test will apply in relation to Disabled Facilities Grant applications for children up to the mandatory maximum grant amount (currently £30,000); although a means test will be carried out for any discretionary assistance awarded above the mandatory £30,000 limits under part 2.2 of this policy). For the purposes of this policy, 'children' are as defined in the Glossary at Appendix 6)

Some applicants may be eligible for a Disabled Facilities Grant, but be required to make a financial contribution, depending on their financial circumstances. This contribution is usually payable before work commences.

Applicants will not be eligible for a Disabled Facilities Grant for work that has already started.

Assistance will not be available to individuals who have no National Insurance number or recourse to public funds. Further details are available from the government's <u>Public Funds</u> web page. (gov.uk webpage, opens in new window)

#### 2.1.2 Determining whether works are appropriate

Disabled Facilities Grants are available for capital expenditure on adaptations which the council considers are necessary and appropriate to meet the needs of the disabled person, and reasonable and practicable having regard to the age and condition of the dwelling. Consideration will be given, at an early stage and in liaison with the applicant, whether moving to alternative accommodation might be a better option. In these circumstances, help and support will be offered in considering what housing options might be available. Details of the Cambridgeshire Early Help, Housing Options for Older People and Older People's Visiting Support service are at Appendix 1.

If moving is considered a better option, discretionary Disabled Persons' Relocation Assistance grant may be available (see part 2.3).

In deciding whether adaptations are necessary, appropriate, reasonable and practicable, and whether they are likely to meet the person's needs, an assessment of the internal layout of the existing dwelling will be carried out. Consideration may be given to funding additional sleeping and/or bathing accommodation by way of an extension to the existing dwelling only where neither rearrangement, nor moving to an alternative property, is feasible.

In determining what works can be funded, this will be based on the recommendations by the Occupational Therapist or, for less complex issues, a Trusted Assessor.

Disabled Facilities Grants are not available to provide adaptations to facilitate the use of mobility scooters, nor provide storage or charging facilities for scooters, as this sits outside of the purposes specified within the Housing Grants, Construction and Regeneration Act 1996 as amended (see Appendix 3).

#### 2.1.3 Amount of grant payable

Under the 1996 Act, the mandatory maximum grant that can currently be awarded for a Disabled Facilities Grant is £30,000. This upper limit has been in place for a number of years and is often not sufficient to cover the costs of larger adaptations.

Where the works required, including any fees, will cost more than the maximum amount set by government, an applicant may be asked to look for additional sources of funding and/or to make a financial contribution themselves. In some circumstances they may be able to apply for discretionary Top Up Assistance to help with this. See part 2.2 below for details.

In the case of housing association tenants, the council or Home Improvement Agency may be able to arrange for the landlord to cover some of the cost.

If the work is arranged through the local Home Improvement Agency, the cost of work will be assessed, and contractors appointed, in accordance with arrangements agreed between the council and the Home Improvement Agency. The Home Improvement Agency will charge a fee for overseeing the works as part of the grant application.

If an applicant arranges for the work to be carried out themselves, the council will fund the lower of a minimum of two quotations, provided the quotations received are reasonable taking into account all the circumstances.

Where an applicant is not using the Agency for the work, they will generally be responsible for paying the contractor direct, and the council will reimburse at agreed payment intervals.

Where the work is to be carried out by a family member, rather than through the Home Improvement Agency or a private contractor, Disabled Facilities Grant assistance will cover what the council considers to be reasonable costs for materials, subject to suitable invoices or receipts. Labour costs may not be covered in these circumstances.

As the council is responsible for deciding the amount of assistance to be paid, they will not be responsible for funding additional work agreed between the applicant and the builder.

Where applications are received for more than one person in a household with the same need, grant will not be payable twice for one adaptation (e.g. for one level access shower).

#### 2.1.4 Means test and contributions

Applicants for Disabled Facilities Grants not receiving one or more qualifying benefits will be means tested using the national Financial Test of Resources in place at the time. More detail on how this assessment will be carried out is at Appendix 4.

Means tests will not be carried out in the case of grants for children unless the cost of the work is likely to go above the mandatory maximum grant amount and a discretionary top up grant is also being sought. (See the <u>Glossary at Appendix 6</u> for definition of who counts as a child for these purposes).

For East Cambridgeshire and Fenland District Council residents, where a means test is required for adaptations for a child, this will involve means testing both the parent(s) and the child.

Variations to the means test may be considered in exceptional circumstances where works likely to cost under £10,000 could be carried out reasonably quickly and are for the benefit of someone with a rapidly progressing/degenerative condition or for someone receiving end of life care. All such decisions will be at the council's discretion.

Advice will be given from the outset on whether or not a disabled person might be eligible and whether the Home Improvement Agency can assist with the application. Where applicants are not eligible for assistance, or their financial circumstances mean that they will need to make a contribution to the cost, the council or Home Improvement Agency may be able to offer advice to the applicant to seek other sources of funding. For example, through charitable contributions or releasing equity in their home.

#### 2.1.5 Carrying out of works

We encourage applicants to have works project-managed by, and delivered through, the local Home Improvement Agency. A fee for this service is charged and will usually be included in the grant award.

In some cases, the applicant may wish to carry out additional work over and above what the council or Home Improvement Agency deems is necessary to meet the needs of the disabled person. In this situation, the council will need to be satisfied that the applicant has sufficient financial resources to fund the additional work.

Where an owner-occupied property is co-owned and one or more of the co-owners is not living there, reasonable attempts will be made to contact the non-resident owner/owners. If still unable to make contact, or permission is not obtained, a decision will be made on whether to

continue with the work, taking into account the best interests of the person requiring the disabled adaptation.

For East Cambridgeshire and Fenland District Council residents, where someone wants help to coordinate adaptations which would help to meet the objectives of this policy, but is not eligible for a grant or loan, our Home Improvement Agency can assist to have the works carried out as a private customer.

#### 2.1.6 Repayment of assistance when the property is transferred/disposed of

Where the value of the grant to an owner occupier exceeds £10,000 a charge will be registered against the property, making some of the grant repayable if the property is disposed of or transferred within 10 years of completion of the work. The minimum charge registered will be £500; the maximum will be £10,000.

#### 2.1.7 Future applications

Where work is completed following a mandatory Disabled Facilities Grant application and the applicant has been required to make a financial contribution to the work, this may in some circumstances reduce the contribution required to be made on future applications for mandatory Disabled Facilities Grant works. Further information is available on request.

Further applications for grants can be made for the same property if needed. For example, if the disabled person's condition changes.

#### 2.1.8 Smaller adaptations

Some small standard adaptations eligible for a Disabled Facilities Grant may be offered as a Special Purposes Assistance grant if funding is available and if the council is satisfied that funding it through discretionary Special Purposes Assistance would significantly speed up the process and improve the outcome for the applicant (see part 2.4 below). The council or Home Improvement Agency will discuss with the applicant the most appropriate route for the individual concerned, and fees and charges may vary. This option, if offered, does not affect the disabled person's statutory right to apply for a Disabled Facilities Grant.

#### 2.1.9 Adaptations in social housing properties

Any adaptations in social housing will require the permission of the provider landlord concerned. Providers will be expected to work with the council and make decisions within reasonable timescales, to prevent unnecessary delays for the applicant.

The council will also expect social housing providers to make a reasonable financial contribution towards the cost of the works.

Owing to local housing and homelessness pressures experienced across all the local authorities, where major adaptations have been carried out and the property is subsequently relet, the council may impose a condition relating to nomination rights throughout the grant condition period. If the property becomes vacant during the grant condition period, the council may require it to be held for letting by persons nominated by the council for a reasonable period of up to four weeks.

Alternatively, the council will expect the provider to make reasonable attempts to allocate the property to someone who needs those adaptations.

Applicants should be aware that some major adaptations may lead to rents or service charges being increased; for example, where an extension increases the number of bedrooms.

Although applications made directly by social landlords on behalf of tenants are not meanstested, in deciding the amount of grant to award the council will take into account the extent to which the landlord is able to charge a higher rent because of the works.

#### 2.1.10 Adaptations in private rented properties

Although applications by private landlords are not means-tested, in deciding the amount of grant to award the council will take into account the extent to which the landlord is able to charge a higher rent because of the works.

#### 2.1.11 Responsibility for adaptations once completed

Once work is completed and the completion certificate has been issued, the property owner and/or relevant person becomes responsible for the adaptation, including following up any issues with the contractor(s) or work required under warranties, and for any future maintenance and repairs.

The Home Improvement Agency 's fees cover the officer time associated with the application, payment and completion of the works. On completion of the works, the Home Improvement Agency is no longer funded to provide on-going support in respect of any defects that may arise.

## 2.2 Disabled Facilities Grant Top Up Assistance (discretionary loan)

In cases where the cost of works agreed through a Disabled Facilities Grant application is above the mandatory maximum grant amount set by government - currently £30,000 - applicants may be able to apply for discretionary Top Up Assistance in the form of a loan which will be secured on the property.

This is a discretionary loan and the decision on whether to award it in each case will depend on the individual's needs, their financial resources, and the resources available to each council.

Details of how discretionary cases may be prioritised is shown in part 4.1 below.

#### 2.2.1 Eligibility

Disabled Facilities Grant Top Up Assistance may be available to those who have been assessed as eligible for a mandatory Disabled Facilities Grant where the cost of approved works is above the mandatory maximum grant amount – currently set at £30,000.

Disabled Facilities Grant Top Up Assistance may be available in cases where:

- The option to move to more suitable accommodation has been explored fully but found not to be feasible; **and**
- Having taken all reasonable steps, funding cannot be found from other sources; and
- Not carrying out the works would mean that the applicant would be unable to remain living in the community; or the person or their carer would be at significant risk if the work was not completed; or completion of the work would potentially bring significant savings in other areas of public provision including health, social care, and education.
- An assessment of the applicant's financial circumstances indicates that they cannot afford to fund the additional costs.

Disabled Facilities Grant Top Up Assistance will be offered as a loan, secured on the property by way of a local land charge. There should be sufficient equity in the property to meet the cost of

the assistance, taking into account any other charges on the property, and any potential uplift in value which might, in the council's opinion, apply to the property once the work is completed. If there is insufficient equity, or if the applicant is a housing association tenant, and no other suitable accommodation can be found, the council may, at its discretion and in exceptional circumstances, consider offering all or part of Disabled Facilities Grant Top Up Assistance as a grant.

In the case of Disabled Facilities Grant Top Up Assistance for adults, the means test carried out to assess eligibility for and any contribution towards mandatory Disabled Facilities Grant will take into account the full cost of the works, including the need for any Top Up Assistance.

Where an application for Disabled Facilities Grant Top Up Assistance is for a child (as defined in the <u>Glossary at Appendix 6</u>), the financial circumstances of the household, including essential income and outgoings, will be taken into account.

#### 2.2.2 Maximum amount payable

The maximum amount payable for discretionary Top Up Assistance will be £30,000 including the local Home Improvement Agency's fees where their services have been used.

The council reserves the right to amend this maximum figure in the light of any future national policy changes or for budgetary reasons.

If the cost of works exceeds the maximum payable through a Disabled Facilities Grant and Disabled Facilities Grant Top Up Assistance, and other options are unavailable, the council may refer the case to Cambridgeshire County Council for them to consider whether they are able to provide any additional funding under their own obligations.

#### 2.2.3 Repayment

For East Cambridgeshire and Fenland District Council residents: where Disabled Facilities Grant Top Up Assistance is awarded, a local land charge will be registered against the property in order to secure the loan. The loan will be required to be repaid in full when the property is transferred/disposed of.

#### 2.2.4 Carrying out of works

Where an owner-occupied property is co-owned and one or more of the co-owners is not living there, reasonable attempts will be made to contact the non-resident owner/owners. If still unable to make contact, a decision will be made on whether to continue with the work, taking into account the best interests of the person requiring the work.

#### 2.2.5 Future applications

Future applications for Disabled Facilities Grant Top Up assistance, where assistance has previously been awarded for that disabled person, will only be considered in exceptional circumstances.

## 2.3 Disabled Persons' Relocation Assistance (DPRA) (discretionary grant)

Disabled Persons' Relocation Assistance is currently available for residents in East Cambridgeshire and Fenland, subject to sufficient funding being available.

Applications for Disabled Persons' Relocation Assistance can be considered for people living in the district where:

Adaptations are required for a person who, having satisfied the means test, is eligible for a Disabled Facilities Grant, but:

- a) relocation may be a better and cheaper option, taking into account the cost of the works and any future works likely to be required in the new property; or-
- b) Where adaptations are required but it is not reasonable or practicable to adapt a disabled person's existing accommodation; or
- c) Where relocation is likely to lead to savings to the wider public purse, or it would help a disabled person to resolve other issues which might impact on health, and/or wellbeing.
- d) If moving from one district to another, the application will need to be made to the district from which the relevant person is moving (e.g. if an applicant is moving from South Cambridgeshire to Fenland, the application will need to be made to South Cambridgeshire).
- e) In each case, a suitable alternative property must have been identified before a formal application for Disabled Persons' Relocation Assistance is submitted.
- f) Disabled Persons' Relocation Assistance may contribute towards reasonable costs of moving to a more appropriate property: Examples of what this may cover include:
  - removal expenses
  - estate agent fees
  - legal fees
  - other relocation expenses reasonably incurred.
- g) It will not include any adaptations which may be required to the new home.
- h) Disabled Persons' Relocation Assistance is discretionary assistance and depends on the individual's needs and the resources available. Details on how discretionary cases may be prioritised is shown in <u>part 4.1</u> below.

#### 2.3.1 Eligibility

Disabled Persons' Relocation Assistance can be considered for applicants who meet the criteria above, where the council is satisfied that the property to which the disabled person is moving more closely meets his/her needs and those of the family than the existing one.

Applications may be considered from/on behalf of owner occupiers and tenants.

A representative of the council or an Occupational Therapist may visit the property being considered for relocation, to ensure it is suitable to meet the needs of the disabled person.

Only applications made before the person has moved home will be considered.

## 2.3.2 Grant payable

Assistance will be in the form of a grant which will not be required to be repaid.

The aggregated cost of the Disabled Persons' Relocation Assistance and any work to adapt the new property must not exceed the cost of adapting the disabled person's existing accommodation.

The final decision as to whether expenditure is appropriate, and costs are reasonable will rest with the council. If the applicant is transferring to a rented property, grant will not be available for anything which is the landlord's responsibility.

The applicant is responsible for getting quotes to cover relocation costs. The council will be responsible for assessing whether costs claimed for are reasonable. Assistance is only payable upon the successful completion of the purchase or sign-up of the tenancy of the 'new' property and is dependent on the disabled person then occupying that property as their only and main residence.

Whether grant is paid to the applicant or to contractors or suppliers will be at the council's discretion.

If the disabled person chooses not to go ahead with the move once some or all of the assistance has been paid, the council reserves the right to require some or all of the money to be repaid.

#### 2.3.3 Future applications

If the disabled person subsequently moves again, a further application for Disabled Persons' Relocation Assistance may only be considered where the disabled person's circumstances have changed significantly since moving into the property for which the assistance was awarded, or where there were particular exceptional reasons; such having to move due to flee domestic abuse, or due to being a member/family member of the armed forces as covered by the Armed Forces covenant. This will be at the council's discretion.

Only one application for Disabled Persons' Relocation Assistance will be considered for that person within any five-year period.

## 2.4 Special Purposes Assistance (SPA) (discretionary grant and/or loan)

Special Purposes Assistance is currently available for residents in East Cambridgeshire and Fenland, subject to sufficient funding being available.

Special Purpose Assistance may be available for home repairs, or other minor works or interventions in the home which the council is satisfied is reasonable and practicable and will help to meet one or more of the Policy's key objectives. Applications should be made to the Home Improvement Agency in the first instance, rather than applying to the council.

It will not normally be offered for interventions which are readily available through other services, or which are a landlord responsibility.

Examples of the types of work may include:

- Property repairs and replacement of fixtures/fittings
- Remedying of Category 1 hazards, including work to reduce the risk of falls
- Energy efficiency measures to promote warm homes
- Security measures
- Works not eligible for a mandatory Disabled Facilities Grant but would help prevent hospital or care admission, speed up transfers of care, and/or save money elsewhere in the health, social care and/or education system
- Additional work to facilitate work required under a mandatory Disabled Facilities Grant but which is not eligible for mandatory Disabled Facilities Grant funding
- Work to make a home dementia-friendly.
- Work to improve digital connectivity or install assistive technology within the home

- Adaptations which would normally be funded through a mandatory Disabled Facilities
  Grant but where the council is satisfied that funding it through Special Purposes
  Assistance would significantly speed up the process and improve the outcome for the
  applicant. The council would also have to be satisfied that there were exceptional
  circumstances which justified the mandatory Disabled Facilities Grant process being
  waived for that particular applicant.
- Larger items of personal equipment where alternative funding is not available, and where provision would be cheaper and/or provide a better outcome for the individual than would be achieved through adaptations.
- Any other request deemed by the council to be reasonable and practicable, and necessary and appropriate to meet the objectives of the Policy.

Special Purposes Assistance is not available for repairs to disability equipment, such as stairlifts, ceiling track hoists, etc, as it is considered to be ongoing maintenance and cannot be funded through capital expenditure. It is generally the responsibility of the owner to maintain equipment in good working order, or it will be covered by manufacturer's warranty

Special Purposes Assistance can be offered as a discretionary grant and/or loan or a combination of the two, and will depend on the individual's needs, the resources available, and the particular district council's wider objectives and priorities. Details on how discretionary cases may be prioritised is given in part 4.1 below.

#### 2.4.1 Eligibility

Applicants must be living in the district and living in the property in question as their only or principal home.

If repair or other work is required other than disabled adaptations, the applicant must normally have been resident in that home for a minimum of two years prior to the date of application.

Applications from tenants will normally only be considered for work which is not the responsibility of the landlord.

Special Purposes Assistance will normally only be considered for those on low income or in receipt of a qualifying benefit. (This does not apply to adaptations for children which are being funded through Special Purposes Assistance but would normally be expected to be funded through mandatory Disabled Facilities Grant. (See <u>Appendix 4</u> for more detail).

Evidence of being in receipt of benefits will normally be required, although if providing evidence would lead to unreasonable and exceptional delays in work being carried out, the council may use its discretion to accept a signed declaration that the person for whom the work is required is in receipt of one of these benefits. If this statement is later found to be false, then the applicant will be required to repay the grant in full.

Special Purposes Assistance will not normally be available for disabled adaptation work where adaptations are already being funded through mandatory Disabled Facilities Grant and Disabled Facilities Grant Top Up Assistance.

#### 2.4.2 Means test and contributions

If not in receipt of a qualifying benefit, a means-test will be carried out based on household income. The means test will apply to the person on behalf of whom the application is being made, as well as any non-resident owners or co-owners. Special Purposes Assistance will not

be available where it is considered that there is sufficient income or savings available to undertake the works required. Applicants may also, depending on their financial circumstances, be required to make a financial contribution, which will usually be payable before the work starts.

The means test may be waived in exceptional circumstances at the council's discretion, e.g. for someone receiving end of life care.

Where the applicant is required to make a contribution but does not have sufficient savings, and the council concerned is satisfied that seeking a contribution would give rise to exceptional financial hardship and be detrimental to the health and wellbeing of the applicant, a decision may be made to waive the contribution. This would be subject to the discretion of the council concerned and availability of funding.

The council or Home Improvement Agency may consider whether other funding options are available in considering whether assistance is payable.

#### 2.4.3 Amount of assistance payable

The maximum amount allowed to one household will generally be £15,000, including any Home Improvement Agency fees. However, for work which would result in remedying Category 1 hazards under thee Housing Health and Safety Rating System (a standard used to measure property condition), the maximum will be £25,000 including fees but may be raised higher for exceptional cases.

#### 2.4.4 Repayment

Where the value of the assistance to an owner-occupier for work other than disabled adaptations exceeds £10,000, a loan for some or all of the amount above £10,000 may be offered. This will be by way of a local land charge registered against the property, making the loan element repayable on transfer or disposal of the property.

#### 2.4.5 Carrying out of works

Where an owner-occupied property is co-owned and one or more of the co-owners is not living there, reasonable attempts will be made to contact the non-resident owner/owners. If still unable to make contact, a decision will be made on whether to continue with the work, taking into account the best interests of the person requiring the work.

East Cambridgeshire and Fenland District Council expect that most discretionary works will be managed through the Home Improvement Agency, unless it is more expedient for the grant applicants to manage the works themselves.

#### 2.4.6 Future applications

Further applications for Special Purposes Assistance will not normally be considered from an applicant household within three years of the work being completed unless there are extenuating circumstances. For example, if refusal would lead to significant health impact or a delayed transfer of care; or if they have had to move to flee domestic abuse, or due to being a member/family member of the armed forces as covered by the Armed Forces covenant.

Where the council agrees to fund further applications for Special Purposes Assistance within three years of the work being completed, if the total costs over that three-year period exceeds £10,000, a local land charge will be placed on the property making the loan element repayable on transfer/disposal of the property.

#### 2.4.7 Responsibility for works once completed

The Home Improvement Agency 's fees cover the officer time associated with the application, payment and completion of the works. On completion, the Home Improvement Agency is no longer funded to provide on-going support in respect of any defects that may arise.

As with Disabled Facilities Grant works, once work is completed and the completion certificate has been signed, the property owner and/or relevant person becomes responsible for the completed works, including following up any issues with the contractor(s) or work required under warranties, and for any future maintenance and repairs.

## 2.5 Discretionary funding of partnership work and other services

This policy allows for Disabled Facilities Grant capital grant funding provided through the Better Care Fund to be made available for other social care capital funding purposes, including wider partnership projects or other services where it can be clearly demonstrated that they would help to meet Better Care Fund objectives and the objectives of this policy.

## PART 3: ACCESS TO THE SERVICE

## 3.1 How to apply and who to contact for further information

East Cambridgeshire and Fenland District Council Home Improvement Agency The Grange, Nutholt Lane

Ely

CB7 4EE

Telephone: 01353 616950

Email: HIA@eastcambs.gov.uk

## 3.2 Valid applications

For an application to be valid, it must be in writing, and all the information required by the council must be provided. This may include, amongst other things:

- Details of why the work is needed
- Details of the relevant works
- Estimates of the cost of the works
- Any financial information required for a financial assessment to be carried out
- Written documentation evidencing a legal interest in the property, and that the person
  on behalf of whom the application is made intends to live there as their only or main
  residence throughout the grant/loan condition period. If the application is for a property
  held in trust or is occupied under another licence, for example in the case of agricultural
  workers, it will be at the council's discretion as to the appropriateness or otherwise of
  the requirement for written documentation.
- For works to be carried out for the benefit of a tenant, a statement of consent to the
  works signed by the person who at the time of the application is the landlord under the
  tenancy.

Exactly what information is required in each case will depend on the type of assistance being applied for and the circumstances of the applicant. More information is available on request.

Where the applicant is using the services of the local Home Improvement Agency, the agency can help with completing the application.

Further information on the types of legal interest and occupancy documentation required are at <u>Appendix 5</u>.

## 3.3 Fees to be charged, and charges for abortive work

The Home Improvement Agency will arrange for work to be carried out under this policy for which they will charge a fee to cover their costs.

The fee-paying structure and what is a reasonable level of fees to be charged will be agreed between the council and the agency and may change over time.

At the time of publication of this policy fees are being charged based on a percentage of the overall cost of the work. However, a minimum fee may be charged for smaller works where calculating it on a percentage basis would not cover the agency's costs.

Where financial assistance is awarded, the fee will be included in the amount to be paid to the client.

Where preparatory work is carried out by the Home Improvement Agency and the applicant decides not to proceed with securing the grant or loan which would include a fee to the agency, the agency reserves the right to charge the applicant separately for some or all of the cost of that up-front work. The same will apply where abortive costs are incurred for non-grant funded work. Decisions will be made on a case-by-case basis.

Up to date information on fees to be charged is available on request.

The fees charged by East Cambridgeshire and Fenland District Council may vary from time to time, and applicants will be advised of the current rate when they appoint the Home Improvement Agency. The agency's fees are subject to VAT.

## 3.4 Repayment

Repayment arrangements may vary from council to council. Where more than one form of assistance is provided, more than one Local Land Charge may be placed on the property.

#### 3.5 Conditions

Information on grant/loan conditions are available from the council or Home Improvement Agency. These conditions remain in force throughout the relevant grant/loan condition period.

In making an application for financial assistance the applicant agrees to the terms and conditions attached to the provision of that assistance.

## 3.6 Other principles

All applications will be dealt with on their merits and decisions made on a case-by-case basis. Any decision to consider applications for assistance which fall outside of the policy will be at the council's discretion.

We will always endeavour to act within the best interests of the person for whom the application is being made, or the work is being carried out.

Before making a loan, or requiring repayment of a grant or loan, the council will have regard to the person's ability to afford to make the contribution or repayment.

We will always assume that the person concerned has mental capacity to make decisions, unless there is documentary evidence or other strong reasons to doubt it.

Exceptions to the policy may be considered in exceptional circumstances.

We will aim to make best use of the resources available to achieve the objectives of the policy.

## PART 4: ADDITIONAL INFORMATION

## 4.1 Prioritisation of funding

While this policy is designed to encourage flexible use of the Disabled Facilities Grant Capital Allocation, where insufficient funding is available, mandatory Disabled Facilities Grants will be given first priority over discretionary assistance.

Where the council considers there will be sufficient funding to provide discretionary assistance on top of mandatory Disabled Facilities Grant work, then applications for discretionary assistance will be dealt with on a first come first served basis, so long as sufficient funding remains available.

If there are a number of applications being considered at any one time, applications will generally be prioritised in the following order:

- 1) Mandatory Disabled Facilities Grants, and Disabled Persons' Relocation Assistance for applicants who would be eligible for a Disabled Facilities Grant, within the terms of part 2.3.1 above.
- 2) Funding to enable works to be carried out through a Disabled Facilities Grant where the work is not eligible for mandatory Disabled Facilities Grant funding
- 3) Disabled Persons' Relocation Assistance under the terms of part 2.3.1 above
- 4) Discretionary Top Up Assistance
- 5) Disabled Facilities Grant works to be carried out under Special Purposes Assistance where the council is satisfied that funding it through Special Purposes Assistance would significantly speed up the process and improve the outcome for the applicant.
- 6) Other Special Purposes Assistance
- 7) Disabled Persons' Relocation Assistance under the terms of part 2.3.1 above
- 8) Discretionary social care partnership projects and/or other services.

The council reserves the right to amend this priority ordering if the need arises. For example, where additional funding becomes available from elsewhere with the intention of it being used for a particular type of assistance; if changes in legislation enable or require it.

In assessing whether to fund assistance other than mandatory Disabled Facilities Grants, and what priority should be given, the council will also consider:

- a) The extent to which providing assistance will meet the objectives of this policy.
- b) Whether the need for assistance is considered serious and urgent both in its own right and relative to any other current applications and enquiries for assistance which the council is considering.
- c) The extent to which the applicant is able and can him/ herself afford to resolve the problem and /or pay for the work.
- d) Whether the work to which the application relates is considered serious or urgent relative to the general state of repair of dwellings in the district.
- e) Any other circumstances which may be relevant at the time.

## 4.2 Approval of application and payment of assistance

Before approving an application, the council will need to be satisfied that the application is complete and that it accurately reflects the applicant's circumstances; also that the applicant clearly understands and accepts the conditions of any financial assistance being provided.

Where the assistance is to pay for work to be carried out:

- The council must be satisfied that the cost of the works is reasonable and that all the appropriate notifications and/or permissions have been obtained e.g., Building Regulations, Planning Permission etc.
- If the Home Improvement Agency has declined the work and the applicant is arranging their own work, they should not make any arrangements for the work to start until they have received the grant/loan approval in writing from the council.
- If carrying out their own work the applicant must notify the council when the work is completed. A council representative may need to visit the property to inspect the works before arranging payment. No payment will be made until the relevant work is completed to the council's satisfaction. The applicant will be responsible for ensuring that any defects are remedied.
- Payment will generally be made by the council to the contractor, unless the applicant
  has managed the work themselves, in which case the applicant will be responsible for
  paying the contractor direct.
- Where the approved work has not been carried out to the satisfaction of the applicant the council may, at the request of the applicant and if it considers it to be reasonable, withhold payment.

Further conditions may apply to the payment of any assistance under this policy, which applicants need to formally agree to before any application can be approved. Details are available from the council or the Home Improvement Agency.

In East Cambridgeshire and Fenland district it is expected that works will be completed within 12 months of grant or loan approval. Failure to make sufficient progress on works funded by a grant and/or loan may result in the grant and/or loan being revoked by the council.

## 4.3 Council decision-making and appeals

All applications for assistance contained within this policy are subject to the council's decision-making processes.

If an applicant wishes to appeal against a decision under this policy, contact the Home Improvement Agency manager in the first instance. The manager will advise the applicant of how an appeal may be taken forward.

The council may make exceptions to the policy in exceptional circumstances, and each case will be considered on its merits.

## 4.4 Equalities

The public sector equality duty under the Equality Act 2010 requires public bodies, in exercising their functions, to have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not; and
- Foster good relations between people who share a protected characteristic and those who do not.

The protected characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation.

An Equality Impact Assessment has been carried out on this policy to ensure that the policy takes into account the needs of all groups, and that particular groups of people are not adversely affected by it.

## 4.5 Safeguarding

There are national requirements for safeguarding and protecting people at risk of abuse or neglect. All the Cambridgeshire councils are committed to safeguarding and promoting the welfare of children and adults who may be at risk, and their policies and processes reflect the direction of Cambridgeshire County Council in relation to safeguarding. All key staff are trained in safeguarding issues. Your council can provide details of its own policies in relation to safeguarding.

#### 4.6 Customer Care and Complaints

In East Cambridgeshire and Fenland, customer care is of paramount importance. Staff are trained in their area of work, and most are experienced at supporting disabled and/or vulnerable people. Contractors are required to act in accordance with a code of conduct, and health and safety is taken very seriously.

Customers who wish to make a complaint should speak first to the manager of the Home Improvement Agency, who will advise on how to make a complaint, and to who the complaint should be made. Complaints will initially be dealt with by the Home Improvement Agency, or the relevant council, depending on the nature of the complaint.

All reasonable attempts will be made to ensure that works are carried out within timescales laid down in national Disabled Facilities Grants guidance. However, there may be factors affecting timescales which are beyond the control of the council or the Home Improvement Agency. Where delays occur, we will do our best to minimise these as far as we can and to keep the applicant updated.

## 4.7 Links with other strategies and plans

In making decisions under this policy regard will be had to wider council priorities. For example, where installing new boilers or other heating systems we will, where funding allows, take the opportunity to improve energy efficiency standards to help meet the council's broader carbon reduction/climate change/ other environmental objectives.

## 4.8 Monitoring of outcomes

A set of performance measures and monitoring targets have been agreed between Cambridgeshire County Council and the district councils.

Overall outcomes are difficult to measure, as providing assistance through this policy may, for some people, be one of a number of factors needed to support independent living. However, customer satisfaction surveys carried out by the Home Improvement Agencies include questions around whether the customer feels that, as a result of work carried out, they have maintained independent living; been able to be discharged from hospital; or been prevented from being admitted to hospital or care home or other specialist setting.

## 4.9 Policy Review

The Policy will run from April 2025. It will be reviewed periodically, as and when necessary.

The maximum amount payable for Disabled Facilities Grants Top Up Assistance, which has been increased since the previous policy, will be reviewed annually within the context of the resources available to fund the policy, or sooner if national rules around the maximum amount of Disabled Facilities Grants payable is changed.

## PART 5: APPENDICES

## Appendix 1 Early Help and Housing Options

In order to achieve better outcomes for people, and to make best use of the resources available, providing repairs and adaptations in the property in which someone is currently living will not always be the best solution; options must also be available for people to move to more suitable accommodation.

The Home Improvement Agencies already provide basic housing options advice. However, with limited funding available, for the policy to be successful it will need to be implemented hand in hand by considering people's wider housing options at an earlier stage.

For adults where their current home may not meet their needs now or in the future, there are Specialist Housing Advisors employed by Cambridgeshire County Council who work with the Adult Early Help Team working with Social Workers and Occupational Therapists. This service provides advice and information on all the possible options that may be available at an early stage.

For older people the councils also promote the use of the Elderly Accommodation Council (First Stop – HOOP) resources to deliver early advice and information on alternative housing options prior to a request for an adaptation. This provides comprehensive information on services available to maintain independence and an independent advice line. Information on alternative housing opportunities - for example sheltered housing, extra care or the purchase of a more suitable home, can inform early decisions. This is especially important if the home will not be suitable in the longer term.

The Housing Options for Older People (HOOP) tool (hoop.eac.org.uk webpage, opens in a new window) is available both online and in leaflet format and is designed to help older people think about how suitable their current home is and can identify what alternative options are nearby.

Support with planning, managing and facilitating a move can be sought from the Older Peoples Visiting Support Services which are delivered across the county to people in all tenures, be they property owners or renters, if this is not readily available from family or friends.

For working-aged people with a disability who are considering applying for an adaptation to their home, information and advice can be sought on alternative social housing options from the local Home-Link teams. Support with planning, managing and facilitating a move may be available from the Floating Support Services available across the county.

For families with a child or young person with Special Educational Needs and Disability (SEND 0-25) where their current home may not meet the child's needs now or in the future, there is a Specialist Housing Officer who works with the SEND Social Care, Occupational Therapists and others.

These services provide advice and information on all the possible options that may be available at an early stage. Often major adaptations can be expensive and the limits of the Disabled Facilities Grant funding available means that sometimes more expensive works (i.e. extensions with specialist equipment) cannot be fully funded that way. Options may include a move to a more suitable property, accessing or moving within social housing, or a new build opportunity.

## Appendix 2 National and Local Context and Supporting Data

#### Legislative background

Provision of financial assistance under this policy is mainly governed by the Housing Grants, Construction and Regeneration Act 1996, as amended by the Regulatory Reform (Housing Assistance) (England and Wales) Order 2002.

National DFG guidance: <u>Disabled Facilities Grant delivery</u>: <u>guidance for local authorities in England (March 2022)</u>, gives more information on the relevant legislation. (gov.uk webpage, opens in new window)

The Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 (gov.uk webpage, opens in new window) gives local authorities a general power to introduce policies for assisting individuals with renewals, repairs and adaptations in their homes through provision of grants or loans. A formally adopted policy must be in place if assistance is to be offered. This policy constitutes each council's Housing Assistance Policy under the Order.

#### National data

According to the English Housing Survey 2021/2022:

- Around 10% of households in England are estimated to be living in a home which have Category 1 hazards under the Housing Health and Safety Rating System.
- 14% of households are living in a home that does not meet the national Decent Homes Standard.
- 4% of households are living in a home with damp present.

Households in the private rented sector are more likely to live in poor quality housing than social renting and owner-occupied households.

A BRE briefing paper, <u>The cost of poor housing in England by tenure (BRE 2023)</u> (bregroup.com pdf, opens in new window) estimates that, in 2019:

- Around 10% of owner-occupied homes had a Category 1 hazard that, if left untreated, would result in an annual cost to the NHS of £783 million
- Around 13% of private rented homes had a Category 1 hazard that, if left unmitigated, would result in an annual cost to the NHS of £290 million
- Around 5% of social rented homes had a Category 1 hazard that, if left unmitigated, would result in an annual cost to the NHS of £65 million.
- The two most prevalent Category 1 hazards in the English housing stock are excessive cold and falls associated with stairs.

#### Local Data

Data and analysis from the <u>Cambridgeshire and Peterborough Joint Strategic Needs</u>
<u>Assessment 2023</u> (cambridgeshireinsight.org.uk webpage, opens in new window) shows that:

- The Cambridgeshire population is almost 679,000, with a 9.3% growth in population since 2011 (Census 2021).
- The population is forecast to increase by 14.3% to 2031, with increases expected across all age bands with the exception of children and young people aged 5 to 14 years.
- Around 16.4% are living with a disability under the Equality Act.

- Healthy life expectancy at birth is 64.2 for males and 67.7 for females, both higher than the England average.
- Although measures of health for Cambridgeshire usually compare quite well with the England average, residents' health across the county varies considerably.
- Generally speaking, residents in Fenland (and Peterborough) have the poorest health, and South Cambridgeshire tends to have the best health. There are patches of poor health in some areas, most commonly in Fenland (and Peterborough) and also in north Cambridge and in parts of Huntingdonshire.
- Most of the local population who are in poor health live outside the most deprived areas, and there are struggling households everywhere, even in areas not considered deprived as a whole.

The councils' Housing and Homelessness and Rough Sleeping Strategies provide information on the local housing market and the councils' strategic approaches to dealing with local housing issues. These, together with data published in quarterly housing market bulletins covering the Cambridge housing sub-region and broken down by district, demonstrate significant pressure within the local housing market.

The Home Improvement Agencies monitor adaptations and other assistance carried out locally, including numbers of referrals, enquiries and applications; numbers of grants and loans awarded; funding committed, and amounts spent; and customer satisfaction data. This data demonstrates, for example:

- An ongoing local need for Disabled Facilities Grants and other discretionary assistance.
- Increasing numbers of Disabled Facilities Grant applications where work would cost more than the national £30,000 Disabled Facilities Grant limit.

## Appendix 3 Disabled Facilities Grants – further information

The provisions governing mandatory Disabled Facility Grants are set out in the Housing Grants, Construction and Regeneration Act 1996, as amended by the Regulatory Reform (Housing Assistance) (England and Wales) Order 2002.

A summary of the purposes for which mandatory Disabled Facility Grants may be given are as follows:

- a) Facilitating access and provision: These include works to remove or help overcome any obstacles which prevent the disabled person from moving freely into and around the dwelling and enjoying the use of the dwelling and the facilities or amenities within it.
- b) Making a dwelling or building safe: Adaptations to the dwelling or building to make it safe for the disabled person and other persons residing with him/her.
- c) Room usable for sleeping: The provision of a room usable for sleeping should therefore only be undertaken if the council is satisfied that the adaptation of an existing room in the dwelling (upstairs or downstairs) or the access to that room is unsuitable in the particular circumstances.
- d) Bathroom: A disabled person should have access to a wash hand basin, a WC and a shower or bath (or if more appropriate, both a shower and a bath).
- e) Facilitating preparation and cooking of food: A wide range of works are available to enable a disabled person to cater independently.
- f) Heating, lighting and power: The improvement of an existing heating system in the dwelling to meet the disabled occupant's needs. Where there is no heating system or where the existing heating arrangements are unsuitable to meet his needs, a heating system may be provided.
- g) Dependent residents: Works to a dwelling required to enable a disabled occupant better access and movement around the dwelling in order to care for another person who normally resides where whether or not they are related to the disabled person.
- h) Access to garden: Works for facilitating access to and from a garden by a disabled occupant or making access to a garden safe for a disabled occupant.

Further details are available from the council or Home Improvement Agency.

## Appendix 4 Test of Resources/ Means Testing

Where required under this policy, a test of resources will be carried out in order to assess the amount, if any, that the applicant must contribute to cost of the works. If the applicant is not in receipt of a qualifying benefit, they may have to provide details of income and capital.

For those in receipt of one or more of certain qualifying benefits or any equivalent or successor benefits at the time of the application, their contribution towards the financial assistance will be nil.

The relevant qualifying benefits set by government at the time of publishing this policy are:

- Universal Credit
- Income Support
- Income based Job Seekers Allowance or Income Based Employment Support Alliance
- Working Tax Credit with gross income less than the current level set by the Department of Work and Pensions
- Housing Benefit
- Guaranteed Pension Credit
- Or Child Tax Credit with a relevant income less than the current level set by the Department of Work and Pensions

In addition to the qualifying benefits set by government, Council Tax Reduction may, under this policy, be treated as a qualifying benefit where it relates to households on a low income. This would exclude other Council Tax Reduction schemes, such as single person discount or severely mentally impaired status, etc.

For those not on one of the qualifying benefits listed above, where means testing is required legally and/or under the policy, a full means test will be carried out under the national test of resources in accordance with the Housing Renewal Grants Regulations 1996 (as amended), or any future legislation that replaces it. This will calculate the applicant's contribution in order to assess the extent to which any assistance may be given up to the maximum eligible expense limit.

The council may in some cases, and where legally permitted, exercise the discretion to consider a grant or loan where applicants are not on qualifying benefits but instead:

- have an income (at the time of application), of less than the current income level recognised by the Department of Work and Pensions,
- and have savings less than the current cut off level determined by the benefits service,
- and are considered to be a priority due to their situation or their urgency of the works required.

The means test or other financial assessment will apply to the person for whom the intervention is being applied for, and any spouse/partner.

Variations to the means test may be considered at the council's discretion; for example, if it would otherwise lead to exceptional hardship.

# Appendix 5 Documentation required to demonstrate a legal interest in the property and intention to remain in the property.

Also see sections 21-22A of the <u>Housing Grants, Construction & Regeneration Act 1996</u> for more detail (gov.uk webpage, opens in new window)

#### Owner-Occupiers

An owner's certificate which certifies that the applicant has or proposes to acquire an owner's interest in the dwelling, and that the applicant intends that the person requiring financial assistance will live in the dwelling as their only or main residence throughout the relevant grant/loan condition period, or for such shorter period as his/her health and other relevant circumstances permit. The council retains the discretion to demand repayment of the grant or loan if this condition is breached.

#### **Tenants**

A tenant's certificate which certifies that the person requiring financial assistance is a tenant, and that they intend that the occupant for whom the assistance is being sought will live in the dwelling as their only or main residence throughout the relevant grant/loan condition period, or for such shorter period as his/her health and other relevant circumstances permit.

The council retains the discretion to demand repayment of the grant or loan if this condition is breached. It will be at the council's discretion whether an application should also be accompanied by an owner's certificate from the landlord.

#### Occupiers (in relation to houseboats and park homes)

Houseboat and park home dwellers will need to demonstrate that they have a legitimate right to occupy that home and/or site. An occupier's certificate will also be required stating that the applicant intends that the occupant for whom assistance is being sought will live in the qualifying houseboat or park home as their only or main residence throughout the relevant grant/loan condition period or for such shorter period as his/her health and other relevant circumstances permit. The council retains the discretion to demand repayment of the financial assistance if this condition is breached. A consent certificate must also accompany an occupier's application, from each person with an interest in the land or mooring, or in the park home site or boatyard itself.

If none of the above certificates are appropriate to the applicant's situation then signed documentation shall be provided by either the owner or the occupier to confirm the intention for future occupation of the property by the person for whom financial assistance is being sought.

#### Availability for letting

In a case where a certificate of intended letting accompanies the application:

- It is a condition of any financial assistance under this policy that, throughout the relevant grant/loan condition period the dwelling will be let or available for letting to the applicant as a residence. Being available as a holiday letting will not satisfy compliance with this requirement.
- It is also a condition of the financial assistance that the council, may, by written notice require the owner to provide, within 21 days of that notice, a statement showing how the property is occupied and by whom.

## Appendix 6 Glossary

TERM	DEFINITION
Assistance Better Care Fund	Any form of financial assistance approved under this policy The Better Care Fund (BCF) (nhs.uk webpage, opens in new window) is a programme spanning both the NHS and local government which seeks to join-up health and care services, so that people can manage their own health and wellbeing and live independently in their communities for as long as possible. The BCF has been created to improve the lives of some of the most vulnerable people in our society, placing them at the centre of their care and support, and providing them integrated health and social care services, resulting in an improved experience and better quality of life.
Category 1 Hazards	Hazards in the home assessed as 'serious' through the <u>Housing Health</u> and <u>Safety Rating System.</u> (gov.uk webpage, opens in new window)
Children	For mandatory Disabled Facilities Grant applications, the relevant person is a child if;  under the age of 16  a person who is 16 or over but not yet 20, and is still in full-time non-advanced education (A level and below) and not getting Income Support, income-based Job Seekers' Allowance, income-related Employment and Support Allowance or Universal Credit.
Condition	Any condition attached to financial assistance approved under this policy. Details of conditions are available on request.
Council	Any reference to council, other than specific references to Cambridgeshire County Council, means the local housing authority operating in the area in which the person on behalf of whom an application is made resides, or an authorised representative of that housing authority, i.e. Cambridge City Council; East Cambridgeshire District Council; Fenland District Council; Huntingdonshire District Council; or South Cambridgeshire District Council. An authorised representative could include, for example: the Home Improvement Agency commissioned by that authority, an Occupational Therapist, a Trusted Assessor, etc.
Disabled person/disabled occupant	<ul> <li>For the purposes of this policy, a person is disabled if:</li> <li>their sight, hearing or speech is substantially impaired.</li> <li>they have a mental disorder or impairment of any kind; or</li> <li>they are physically substantially disabled by illness, injury, impairment present since birth, or otherwise.</li> <li>The disability must be substantial and permanent. (See s100 Housing Grants, Construction and Regeneration Act 1996 for full definition)</li> </ul>
Discretionary assistance	Grants and/or loans which the council may make available to applicants, subject to having a policy in place, and to having sufficient funding available to offer that assistance. The extent to which discretionary assistance may be available to an applicant may also be subject to how the council concerned interprets and/or implements financial regulations – e.g. use of capital grant funding for revenue purposes.
Disposal/transfer of a property	Any reference to 'disposal' of a property means:  • A conveyance of the freehold

	<ul> <li>An assignment of the lease – where the lease was used to</li> </ul>
	qualify for the assistance: e.g. a long lease that was treated as effective ownership
	<ul> <li>The grant of a lease, other than a mortgage term, for a term of more than 21 years otherwise at a rack rent</li> </ul>
	<ul> <li>In the case of a mobile home or a houseboat, the sale, pledge or assignment of the mobile home or houseboat.</li> </ul>
Home Improvement Agency	An agency commissioned by the council to support people to remain independent at home. The role of the local agency is outlined in <u>part 1.4</u> of this policy.
Household	The person or persons who occupy a dwelling as their only or main residence.
Housing Health and	National system for assessing risks in residential properties (gov.uk
Safety Rating System (HHSRS)	webpage, opens in new window). Replaced the old housing fitness standard.
Local land charge	Local land charges are defined in the government's <u>Practice Guide 79:</u>
	Local Land Charges (gov.uk webpage, opens in new window). For the
	purposes of this policy, a local land charge registered on a property may require financial assistance to be repaid to the council on resale
	of the property.
Mandatory	Disabled Facilities Grants are 'mandatory' in that local authorities are
assistance	legally required to provide them to applicants who meet national eligibility requirements.
Maximum amount	The maximum amount the government says that a council can pay as a
for Disabled	mandatory Disabled Facilities Grant. At the time of writing this policy
Facilities Grants	the maximum was set at £30,000, but the government has indicated that this is likely to change in future.
Means test/test of	As part of an application for some forms of assistance under this
resources	policy, a test of resources must be carried out in order to assess the amount, if any, that the applicant must contribute to the cost of the
	works. If the applicant is not in receipt of a qualifying benefit, they will
	have to provide details of income and capital. More information is available in Appendix 4 to this policy.
Owner's interest	Where an application for a Disabled Facilities Grant (or other works to
	the home) has been made by an owner-occupier the applicant must
	provide proof of ownership. Under the 1996 legislation: An owner's
	certificate' certifies that the applicant has, or proposes to acquire, an
	owner's interest (as defined in section 21(2)) in the dwelling, and that he intends that the disabled occupant will live in the dwelling as his
	only or main residence'. For more information see Appendix 5 to this
	Policy
Regulatory Reform	Councils have powers to provide financial assistance to individuals to
Order Repair and	help them improve living conditions. In order to be able to use those powers they need to have a published policy detailing how they will
Renewal policies	use those powers.
Relevant person	The person for whose benefit the financial assistance is offered and/or work is being carried out.
Trusted Assessors	Staff within the Home Improvement Agency who have been trained to
	Trusted Assessor Level 4 standard which demonstrates a reasonable level of competence and experience in assessing for basic home
	adaptations.
	•

# Cambridgeshire Housing Adaptations, Repairs & Renewals Policy 2025-2030

# **SUMMARY**

#### Introduction

This policy is aimed at helping people in Cambridgeshire to live safely and independently at home.

# This version of the policy applies to people living in the East Cambs and Fenland areas.

(Separate documents are available for residents of Cambridge City, Huntingdonshire, and South Cambs areas. Their versions of the policy are largely the same as this one, but with some slight differences).

## Types of financial assistance

The policy includes four types of financial assistance – in the form of grants or loans - which may be available to those on low incomes:

- 1. Mandatory **Disabled Facilities Grants (DFGs)** to provide disabled adaptations in people's homes.
- 2. Discretionary **Top Up Assistance** where the cost of works agreed through a Disabled Facilities Grant application is above the statutory maximum amount currently set nationally at £30,000 (may be subject to change).
- 3. Discretionary **Relocation Assistance** to help disabled people to move to a more appropriate home; and
- 4. Discretionary **Special Purposes Assistance** for repairs, or other minor works or interventions in the home.

The tables below give more detail on each of these.

The funding available to the council may also be used to fund wider partnership projects which can be funded through capital expenditure and which help to meet the objectives of the policy.

## **Objectives of the policy**

The policy is aimed at people on low incomes. Key objectives policy are:

- To support individuals' choices around living healthily, safely and independently at home.
- To help prevent hospital, care home or residential school admission
- To facilitate a patient being discharged from hospital and enabling them to live safely and independently at home, including making it easier for carers to provide support
- To prevent the need for higher expenditure elsewhere in the health and/or social care system
- To improve housing conditions and remove hazards in the home (i.e. Category 1 hazards under the Health & Safety Rating System)

## Further information and how to apply.

Your council or the East Cambs and Fenland Home Improvement Agency (HIA) can help you to apply for financial assistance.

If the grant or loan is to pay for work to be done in your home, the Home Improvement Agency can also arrange for that work to be carried out on your behalf.

If you need help to coordinate adaptations which would help to meet the objectives of this policy, but are not eligible for a grant or loan, The East Cambs and Fenland HIA may be able to help you to have work carried out as a private customer.

As part of considering any application, there is likely to be an initial discussion with you on whether, if you are offered financial assistance, your home is likely to remain suitable for you in the longer term. As part of this discussion you may, if appropriate, be pointed towards advice and help in thinking about longer term housing options.

The <u>District</u> Councils have a statutory duty to provide Disabled Facilities Grants to those who need them. However, the extent to which the other three discretionary forms of assistance can be offered will depend on both the individual's needs and the resources available to the relevant council at the time.

For more information on what the policy covers and whether you might be eligible, please contact:

East Cambs & Fenland Home Improvement Agency, The Grange Nutholt Lane Ely Cambridge CB7 4EE

Web page: HIA@eastcambs.gov.uk

Email: www.eastcambs.gov.uk

Tel: 01353 616951

# **Grants and Loans: Summary**

Disabled Facilities Grant (DFG)		
Section in policy	Section 2.1	
Mandatory or discretionary	Mandatory (Eligibility is based on current legislation – may be subject to future change)	
Description	Home adaptations for disabled people	
Grant or loan	Grant, secured on the property through a local land charge.	
Maximum amount	Maximum amount allowed to be paid, including Home Improvement Agency fees, is set by government. (£30,000 at March 2025)	
Means test	Adults: Must be in receipt of one or more qualifying benefits or undergo a full Financial Test of Resources.  Children and eligible young people: not means tested	
Tenure	All tenures (except council tenants in Cambridge City and South Cambridgeshire)	
Specific restrictions	National eligibility criteria apply	
Residency requirements	None	
Secured on property	Yes – for grants over £10,000. Minimum charge £500; maximum charge £10,000	
Repayable	Yes, if property disposed of within 10 years.	
Restrictions on future applications	Further applications may be considered	

Disabled Facilities Grant (DFG) Top Up			
Section in policy	Section 2.2		
Mandatory or discretionary	At the discretion of the council		
Description	Where the cost of mandatory DFG works is higher than the maximum amount allowed by government to be paid for a DFG. (See Disabled Facilities Grants above). Alternative accommodation and funding options must have been explored. May be available where not carrying out work would mean not being able to remain in the community or would present significant risks. May also be available where work could lead to savings to the public purse.		
Section in policy	Section 2.2		
Grant or loan	East Cambs & Fenland residents:  Loan – secured on the property through a local land charge		
Maximum amount	£30,000 including Home Improvement Agency fees. (Amount may be subject to change).		
Means test & contributions	Adults: means test carried out for DFG will take into account full cost of work. Applicant may be required to make a contribution.		
	Applications on behalf of children (as defined in the full policy): Standard DFG means test will be carried out, but essential outgoings will also be taken into account.		
Tenure	All tenures (except council tenants in Cambridge City & South Cambridgeshire)		
Specific restrictions	Applicant must be eligible for DFG. May be available where: a move to alternative accommodation is not feasible, and funding is not available from elsewhere, and without work the applicant would be unable to remain living in the community, or person or carer would be at		

Disabled Facilities Grant (DFG) Top Up			
	significant risk; or work would generate public service savings. Assessment of financial circumstances must indicate they cannot afford to fund the additional costs.		
Residency requirements	None		
Secured on property	Yes – full amount		
Repayable	Yes – full amount repayable on disposal of property.		
Restrictions on future applications	Further applications only considered in exceptional circumstances		

Disabled Persons' Relocation Assistance				
Section in policy	Section 2.3			
Mandatory or discretionary	At the discretion of the council			
Description	To help with reasonable costs of a disabled person moving to a more suitable home.			
Grant or loan	Grant			
Maximum amount	Maximum amount payable £5,000.			
Means test	Must already be eligible for DFG – finances will already have been assessed.			
Tenure	All tenures (except council tenants in Cambridge City and South Cambridgeshire)			
Specific restrictions	<ul> <li>a) Adaptations required, but moving home may be better and cheaper, taking into account cost of works required in current and new home; or</li> <li>b) Existing accommodation is not adaptable and new home more closely meets needs; or</li> <li>c) Moving home is likely to lead to wider public savings, or would help to resolve other health and/or wellbeing issues.</li> <li>A suitable alternative property must have been identified.</li> </ul>			

Disabled Persons' Relocation Assistance			
	Application needs to be made to the District from which the relevant person is moving.		
	Cost of Disabled Persons' Relocation Assistance and any work to adapt the new property must not exceed the cost of adapting the disabled person's existing accommodation.		
Residency requirements	None		
Secured on property	No		
Repayable	No, unless applicant decides not to go ahead with the move.		
Restrictions on future applications	Individual's circumstances must have changed significantly for a further application to be considered, or other exceptional circumstances apply. Only one application per person will be considered within any five-year period.		

Special Purposes Assistance			
Section in policy	Section 2.4		
Mandatory or	At the discretion of the council		
discretionary			
Description	Home repairs, minor works or other interventions in the		
	home to meet policy objectives.		
Grant or loan	Foot Combo & Fonland regidents: First C10 000 co. c		
Grant or loan	grant, with some or all of anything above that amount		
	offered as a loan		
Maximum amount	£15,000 including Home Improvement Agency fees;		
	except for work for an owner-occupier which would result in removal of Category 1 hazards* where the maximum		
	will be £25,000 including fees. (Amounts may be subject		
	to change).		

Special Purposes Assistance		
	*Category 1 hazards under the Housing Health & Safety Rating System	
Means test & contributions	Must be in receipt of a qualifying benefit or be means tested, other than in exceptional circumstances. Means test will also apply to any non-resident owners or co-owners. The applicant may be required to make a contribution. (The financial assessment will not apply to adaptations for children which would normally be funded as a mandatory DFG).	
Tenure	All tenures (except council tenants in Cambridge City & South Cambs), where work is not the landlord's responsibility.	
Specific restrictions	Not normally available for disabled adaptation work already being funded through DFG and DFG top-up award.  Not available for disability equipment repairs and maintenance which cannot be treated as capital expenditure.	
Residency requirements	Must be living in the property as their only or principal home. For works other than disabled adaptations: applicant must have lived there for 2 years prior to date of application other than in exceptional circumstances.	
Secured on property	Yes – for amounts over £10,000. Secured on the property as a local land charge.	
Repayable	Any amount over £10,000 awarded to an owner-occupier will be repayable on transfer or disposal of the property.	
Restrictions on future applications	3 years from completion of work, except in extenuating circumstances. If further work is funded within the 3 years and the total cost exceeds £10,000, the amount above £10,000 will be repayable on sale/transfer of the property	

#### FENLAND DISTRICT COUNCIL

# **Equality Impact Assessment** (EqIA)

This tool helps the Council ensure that we fulfil legal obligations of the <u>Public Sector</u> Equality Duty to have due regard to the need to –

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

\*(Note that this EqIA has been agreed by Fenland District Council. The other Cambridgeshire Districts covered by the policy may have their own EqIAs).

1. Title of strategy, policy, plan, project, contract or major change to your service
Cambridgeshire Housing Adaptations, Repairs & Renewals Policy

2. Webpage link to full details of the strategy, policy, plan, project, contract or major change to your service (if available)

Insert link for new policy once approved by Cabinet.

3. What is the objective or purpose of your strategy, policy, plan, project, contract or major change to your service?

Each of the five District Councils in Cambridgeshire have had an Adaptation & Repairs Policy in place for many years, explaining how mandatory Disabled Facilities Grants (DFGs) and other discretionary grants/loans for home adaptations and improvements (mainly in the private sector) will be awarded to people on low incomes within their Districts.

In 2019, when Disabled Facilities Grant funding from government had started to be channelled through the Integrated Care System's Better Care Fund, a Cambridgeshire-wide approach was adopted to spell out options more clearly, and to try to gain as much consistency as possible amongst the policies of the five districts.

The policy is based on a review of, and will replace, the existing Cambridgeshire Adaptations & Repairs Policy adopted in 2019.

It proposes a continuation of the same types of financial assistance for eligible applicants on low incomes for adaptations, repairs and improvement to their homes.

It also details some of the help and support which the council's Home Improvement Agency, CambsHIA, may provide in applying for assistance and arranging for work to be carried out.

The policy as whole is expected to cover the five Cambridgeshire District Councils: Cambridge City, East Cambridgeshire, Fenland, Huntingdonshire and South Cambridgeshire District Council. This Equality Impact Assessment is based on the version of the policy aimed at East Cambs and Fenland residents, on the basis of having a shared service Home Improvement Agency across the two Districts.

The objectives of the policy, which is aimed at people on low incomes, are:

- To support individuals' choices around living healthily, safely and independently at home
- To help prevent hospital, care home or residential school admission
- To facilitate patients being discharged from hospital and enabling them to live safely and independently at home, including making it easier for carers to provide support
- To prevent the need for higher expenditure elsewhere in the health and/or social care system
- To improve housing conditions and remove hazards in the home (ie Category 1 hazards under the Health & Safety Rating System)

#### 4. Responsible Team and Group

The Fenland District Council working group together with the other Cambridgeshire Districts: East Cambridgeshire, Huntingdonshire and South Cambridgeshire District Council.

5. Who will be affected by this strategy, policy, plan, project, contract or major change to your service?	⊠ Residents □ Visitors		
(Please tick all that apply)	□ Staff		
Residents of Fenland requiring financial assistance for disabled ac repairs/improvements to their homes.	daptations, or for other		
6. What type of strategy, policy, plan, project, contract or major change to your service is this?	□ New □ Major change ⊠ Minor change		
7. Are other departments or partners involved in delivering this strategy, policy, plan, project, contract or major change to your service? (Please tick)	⊠ Yes □ No		
Cambridgeshire County Council	L		
NHS Cambridgeshire & Peterborough			
Cambridgeshire Home Improvement Agency (Cambs HIA)			
East Cambridgeshire & Fenland's Home Improvement Agency			
8. Has the report on your strategy, policy, plan, project, contract or major change to your service gone to Committee? If so, which one?			
Fenland District Council Cabinet 24 March 2025			
9. What research methods/ evidence have you used in order impacts of your strategy, policy, plan, project, contract or service?			
Historic service user data			
National and local data as referred to in the sections below.			
Engagement with staff and partners including:			
Grant Officers and Home Improvement Agencies (HIAs) or Cambridgeshire.	perating across		

- People with disabilities and third sector organisations, through Healthwatch Cambridgeshire.
- Cambridgeshire County Council Adult Social Care and Special Educational Needs Commissioners.
- Cambridgeshire Occupational Therapy services.
- The Cambridgeshire & Peterborough Integrated Care Partnership Health & Wellbeing Board.

#### 10. Potential impacts

For each category below, please explain if the strategy, policy, plan, project, contract or major change to your service could have a positive/ negative impact or no impact. Where an impact has been identified, please explain what it is. Consider impacts on service users, visitors and staff members separately.

(a) Age - Please also consider any safeguarding issues for children and adults at risk

Older people: POSITIVE IMPACT

#### Data

#### Census 2021

Percentage of population aged 65 and over:

Cambridge City: 11.2%East Cambridgeshire: 11.2%

Fenland 22.8%

• Huntingdonshire 20.1%

• South Cambridgeshire 19.7%

#### Housing Needs of Specific Groups, Cambridgeshire & West Suffolk, GL Hearn 2021

Expected increase in population aged 65+ with mobility problems between 2020 & 2040:

Cambridge: 51.3% increaseEast Cambridge: 68.9% increase

• Fenland: 56.7%

• Huntingdonshire: 85.4%

• South Cambridgeshire: 62.1% increase

#### Family resources survey 2021 to 2022

- 45% of pension age adults in the UK are disabled.
- The most common impairment amongst disabled State Pension adults was a mobility impairment

#### Centre for Ageing Better, The role of home adaptations in later life, 2017

- There is strong evidence that minor home adaptations are an effective and costeffective intervention for preventing falls and injuries, improving performance of everyday activities and improving mental health.
- There is strong evidence that minor adaptations are particularly effective at improving outcomes and reducing risk when they are combined with other necessary repairs and home improvements, such as improving lighting and removing trip and fall hazards.
- Adaptations may potentially relieve pressures on accident and emergency services, speed hospital discharge and reduce the need for residential care.

#### English Housing Survey, Older People's Housing 2020-21

- 15% of older households lived in homes that failed to meet the Decent Homes Standard. Nearly a third of older private renters (30% of households) lived in a nondecent home,
- Older private renters (19% of households) were more likely to have a Category 1 hazard present in their home than owners
- More than half of older households lived in homes that had an Energy Efficiency Rating of D or below.

#### Centre for Ageing, The State of Ageing 2022

- More than half of non-decent homes in England & Wales are occupied by someone 55 or older; with the likelihood of living in a non-decent home being highest in the private rented sector.
- Almost a quarter of those aged 75 and over renting privately are at risk from Category 1 Hazards under the Housing Health &Safety Rating System

#### Government statistics: Profile of Households & Dwellings 2023

 Households with a Household Reference Person aged 65 or over made up the greatest proportion of the owner-occupied sector (36%).

#### **Impact**

Subject to the amount of funding available for each local authority, the policy supports all age groups, including older people, by:

- Clarifying the eligibility criteria for Disabled Facilities Grants
- Providing DFG top-ups for when the national maximum DFG amount payable is not sufficient, and increasing the maximum top-up amount payable from £15,000 to £30,000.
- Providing relocation grants for people who are eligible for DFGs but for whom moving is likely to be a better option
- Providing financial assistance for repairs or improvements, including home energy improvements, to owner-occupiers on low incomes.
- Potentially: preventing falls and injuries amongst older people; improving performance of everyday activities; improving mental health; speeding up hospital discharge; and reducing the need for residential care. (Based on national evidence, although not possible to measure on a local or individual basis).

Younger people: POSITIVE IMPACT

#### Data

#### English Housing Survey Home Adaptations Report 2019-20

• Households with a person aged under 55 that required adaptations were more likely to report that their accommodation was unsuitable (30%) than those that required adaptations in older age groups (20% or less).

#### **Adaptation costs**

The cost of adaptations for larger works such as home extensions for children and young people can range from around £40k to £85k, which is higher than the statutory maximum amount payable to an applicant for a DFG.

#### **Impact**

Subject to the amount of funding available for each local authority, the policy supports all age groups, including younger people by:

- Clarifying the eligibility criteria for Disabled Facilities Grants to help ensure understanding amongst applicants and professionals of what is available and to whom.
- Continuing to provide DFG top-ups for when the national maximum DFG amount payable is not sufficient, increasing the maximum top-up amount payable from £15,000 to £30,000, and adding that where costs go above this amount cases may be referred to the County Council to be considered under their own obligations. Children and young people with disabilities are more likely than other groups to need need larger scale adaptations such as home extensions. The changes should help cover the rising costs of these types of works, and may help to deliver DFGs more quickly for this group.
- Continuing to providing relocation grants for people who are eligible for DFGs but for whom moving is likely to be a better option.
- Continuing to provide financial assistance for repairs or other home improvements to owner-occupiers on low incomes.
- Taking outgoings into account when assessing a household's financial circumstances in relation to top-up assistance for children's adaptations, potentially making more children and young people eligible for DFGs; (although this would not be measurable as there is no historic data on applications rejected due to not meeting the means test).

#### (b) Disability

#### POSITIVE IMPACT

#### Data

#### Census 2021 Disability England & Wales

Percentage of residents who identified as being disabled under the Equality Act with day-to day activities limited a lot:

Cambridge: 6.2%

East Cambridgeshire: 5.8%Huntingdonshire: 6.1%

• Fenland: 8.4%

• South Cambridgeshire: 5.1%

Percentage of households containing one or more disabled person:

• Cambridge: 28.3%

• East Cambridgeshire: 29.9%

• Fenland: 35.7%

• Huntingdonshire: 29.8%

• South Cambridgeshire: 28.2%

#### English Housing Survey Home Adaptations Report 2019-2020

- 8% of all households in England had at least one person with a long-standing physical or mental health conditions and said they required adaptations to their home.
- 81% of households that required adaptation felt their home was suitable for their needs. The 19% that required adaptations and who considered their accommodation unsuitable accounted for 2% of all households in England.
- The number and percentage of households that reported they did not have all the adaptations that they needed has increased from 45% in 2014 to 53% In 2019-20.

#### UK Disability Survey research report June 2021

- 47% of disabled people reported that it required at least 'some effort' getting in and out of where they live
- Disabled people reported that fully adapting their homes would significantly improve their lives by increasing their independence and safety; and some reported that moving to accessible housing would improve their lives.

#### Social Metrics Commission - 2023 report - Social Metrics Commission

• 58% of all people in poverty in the UK are disabled or living in a family that includes a disabled person.

#### National Energy Action 2024

• Estimated that 3.6m people in the UK with a disability would be in fuel poverty from April 2024.

#### Public Health England, Disability & Domestic Abuse

• Disabled people experience disproportionately higher levels of domestic abuse than non-disabled people.

Subject to the amount of funding available for each local authority, the policy should support disabled people by:

- Clarifying the eligibility criteria for Disabled Facilities Grants to help ensure understanding amongst applicants and professionals of what is available and to whom.
- Continuing to provide DFG top-ups for those on low incomes when the national maximum DFG amount payable is not sufficient, and increasing the maximum top-up amount payable from £15,000 to £30,000 which may help to speed up delivery of larger scale adaptations.
- Continuing to provide relocation grants for people on low incomes who are eligible for DFGs but for whom moving is likely to be a better option
- Continuing to provide financial assistance for repairs or home improvements to owner-occupiers on low incomes, including energy efficiency, and taking additional opportunities to improve energy efficiency as part of other works.
- Allowing for the means test to be waived in exceptional circumstances at council's discretion – e.g. for someone with a degenerative or rapidly progressing condition or receiving end of life care.
- o Clarifying that decisions will be made in the best interest of the disabled person.
- Expecting social landlords to attempt to re-let properties with major adaptations to another disabled person.
- Allowing applicants to be reconsidered for Relocation Allowance if they have to move again due to fleeing domestic violence or abuse.

#### (c) Gender reassignment

NO SPECIFIC IMPACTS IDENTIFIED

(d) Marriage and civil partnership
NO SPECIFIC IMPACTS IDENTIFIED
(e) Pregnancy and maternity
(c) Fregnancy and materinty
NO SPECIFIC IMPACTS IDENTIFIED
(f) Race – Note that the protected characteristic 'race' refers to a group of people

defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

#### Census 2021 Protected characteristics by disability status

• The highest age-standardised rates of disability occurred for people who identified with the ethnic groups "White: Gypsy or Irish Traveller" (33.2% in England and 39.1% in Wales) and "Mixed or Multiple ethnic groups: White and Black Caribbean" (22.4% in England and 26.7% in Wales).

#### English Housing Survey 2021-2022, housing quality & condition

• Owner-occupier households with an ethnic minority Household Reference Person were slightly more likely to be living in a non-decent home than white owner-occupier households.

#### Government statistics: People in low income households 2023

 A report from the Office for National Statistics in 2019 showed that most ethnic minority groups earned less than their white British counterparts. The exceptions were the Chinese, white Irish and Indian ethnic groups. These groups earned a higher typical hourly wage than white British employees.

Social Metrics Commission: Measuring Poverty 2023

• The rate of poverty is much higher for Black and Minority Ethnic families. 40% of people living in families where the household head is Black/African/Caribbean/ Black British are in poverty, compared to just under 19% of those living in families where the head of household is White.

<u>Joseph Rowntree Foundation: Bangladeshi, Black African and Pakistani households at higher risk of very deep, long-term poverty, December 2024</u>

 Bangladeshi, Black African and Pakistani households are 2 to 3 times more likely to experience persistent very deep poverty, compared to white households.

Subject to the amount of funding available for each local authority, the policy should support people from ethnic minorities who are on low incomes by:

- Clarifying the eligibility criteria for Disabled Facilities Grants to help ensure understanding amongst applicants and professionals of what is available and to whom.
- Continuing to provide DFG top-ups for when the national maximum DFG amount payable is not sufficient,
- Increasing the maximum top-up amount payable from £15,000 to £30,000, which may speed up the delivery of adaptations for households with children, including ethnic minority households
- Continuing to provide relocation grants for people who are eligible for DFGs but for whom moving is likely to be a better option
- Continuing to provide financial assistance for repairs or other home improvements to owner-occupiers in non-decent homes.
- Clarifying that occupiers of all types and tenures of residential properties are eligible to apply, which may also include Gypsy/Roma/Traveller communities not living in bricks and mortar housing.

(g) Religion or belief		
NO SPECIFIC IMPACT IDENTIFIED		

#### (h) Sex

#### Census 2021 Disability by Age:

Women are more likely to be disabled and be limited by their condition or illness than men: In England, 18.7% of females and 16.5% of males were disabled. Of these, 10.8% of females and 9.4% of males said that they were limited a little by a condition or illness, and 7.8% of females and 7.1% of males said they were limited a lot.

#### Employment in the UK: April 2024:

• The national employment rate for women, at 71.6%, is lower for women than for men (78.0%) and for the population as a whole (74.5%).

#### Gender pay gap in the UK 2024:

 Women tend to be paid less than men. The national pay gap between men and women for all employees in 2024 was 13.1%

#### Public Health England, Disability & Domestic Abuse

- Women are significantly more likely to experience domestic violence than men, and disabled women are significantly more likely to experience it than disabled men.
- Disabled men experience a similar rate of domestic abuse as non-disabled women.

Subject to the amount of funding available for each local authority, the policy should support both sexes, but women in particular, by:

- Clarifying the eligibility criteria for Disabled Facilities Grants to help ensure understanding amongst applicants and professionals of what is available and to whom.
- Continuing to provide DFG top-ups for when the national maximum DFG amount payable is not sufficient, and increasing the maximum top-up amount payable from £15,000 to £30,000 which may potentially speed up the delivery of larger scale adaptations.
- Continuing to provide relocation grants for people who are eligible for DFGs but for whom moving is likely to be a better option
- Continuing to provide financial assistance for repairs or other home improvements to owner-occupiers in non-decent homes.
- Clarifying that decisions will be made in the best interest of the disabled person.
- Expecting social landlords to attempt to re-let properties with major adaptations to another disabled person.
- Allowing applicants to be reconsidered for Relocation Allowance, or to make further applications for Special Purposes Assistance within 3 years of work being completed, if they have to move again due to fleeing domestic violence or abuse.

#### (i) Sexual orientation

#### Census 2021 Protected Characteristics by Disability Status

• The percentage of disabled people who identified as lesbian, gay, bisexual or another minority sexual orientation (6.4% in England and 6.1% in Wales) was greater than that of non-disabled people (2.6% in England and 2.5% in Wales).

The policy should support disabled LGBTQ people by:

- Clarifying the eligibility criteria for Disabled Facilities Grants to help ensure understanding amongst applicants and professionals of what is available and to whom.
- Continuing to provide DFG top-ups for when the national maximum DFG amount payable is not sufficient and increasing the maximum top-up amount payable from £15,000 to £30,000 which may potentially speed up the delivery of larger adaptations.
- Continuing to provide relocation grants for people who are eligible for DFGs but for whom moving is likely to be a better option.
- Clarifying that decisions will be made in the best interest of the disabled person.
- Expecting social landlords to attempt to re-let properties with major adaptations to another disabled person.
- (j) Other factors that may lead to inequality in particular, please consider the impact of any changes on:
  - Low-income groups or those experiencing the impacts of poverty.
  - People of any age with care experience this refers to individuals who spent part of their childhood in the care system due to situations beyond their control, primarily arising from abuse and neglect within their families. The term "Care experience" is a description of a definition in law, it includes anyone that had the state as its corporate parent by virtue of a care order in accordance with the Children Act 1989 and amendments.
  - Groups who have more than one protected characteristic that taken together create overlapping and interdependent systems of discrimination or disadvantage. (Here you are being asked to consider intersectionality, and for more information see: https://media.ed.ac.uk/media/1 | 159kt25q).

#### **Poverty**

#### POSITIVE IMPACT

(See under different Equalities groups above)

#### People with care experience

NO SPECIFIC IMPACTS IDENTIFIED

#### Intersectionality

#### POSITIVE IMPACT

As detailed above, the following groups with more than one protected characteristic are particularly likely to benefit from the elements of the policy relating to provision of disabled adaptations:

#### Older people with disabilities:

 Older people are more likely to have mobility problems than other age groups, and there is strong evidence that adaptations and removal of home hazards can improve a number of outcomes for this group

#### Younger people with disabilities:

- Households aged under 55 who require adaptations are more likely to report that their accommodation is unsuitable than those in older age groups;
- The cost of adaptations for children and young adults such as home extensions is often higher than the statutory maximum payable through a DFG.

#### Women with disabilities

 Women are more likely to be disabled and limited by their condition and illness than men.

#### Men with disabilities

• Disabled men experience a similar rate of domestic abuse as non-disabled women.

#### Disabled people living in poverty

- Over half of all people in poverty in the UK are disabled/living in a family which includes a disabled person. Fuel poverty is also an issue for this group.
- People with disabilities are more likely to experience domestic abuse than nondisabled people.

#### Ethnic minorities with disabilities

 Disability rates are higher for those identifying as White Gypsy/Irish Traveller, and mixed or multiple ethnic groups, than for other ethnicities.

#### LGBTQ people with disabilities

• The percentage of LGBTQ people with disabilities is higher than that of non-disabled people.

As detailed above, with the policy aimed at people on low incomes, the following groups with more than one protected characteristic are particularly likely to benefit from the policy overall.

Ethnic minorities living in poverty

 Rates of poverty are higher for black & minority ethnic families than for households headed by a person who is white.

Women living in poverty/on low incomes

• Women tend to be paid less and are less likely to be employed than men.

11. Action plan – New equality impacts will be identified in different stages throughout the planning and implementation stages of changes to your strategy, policy, plan, project, contract or major change to your service. How will you monitor these going forward? Also, how will you ensure that any potential negative impacts of the changes will be mitigated? (Please include dates where possible for when you will update this EqIA accordingly.)

No negative impacts have been identified.

The policy as a whole is aimed at people on low incomes, and three of the four types of assistance included in the policy are aimed specifically at people with disabilities.

Ensuring the policy continues to appropriately meet the needs of groups with protected characteristics will be through monitoring the take-up of grants of loans and of satisfaction levels.

Fenland District Council will look to improve the understanding and identifying opportunities to reach different equalities groups, and making sure their needs are met; and ensuring policies, practices, and initiatives foster a culture of equality, diversity and inclusion.

This EqIA will be monitored and updated in accordance with Fenland District Councils Equality Service Champions working group timetables.

I2. Do you have any additional comments?	
n/a	

# 13. Sign off

Name and job title of Fenland District Council lead officer for this equality impact assessment

Mr Steven Hammond – Private Sector Housing Officer.