

# Cyngor Sir Powys County Council

## Impact Assessment (IA)

*The integrated approach to support effective decision making*



**Please read the accompanying guidance before completing the form.**

This **Impact Assessment (IA)** toolkit, incorporates a range of legislative requirements that support effective decision making and ensure compliance with all relevant legislation. **Draft versions of the assessment should be watermarked as "Draft" and retained for completeness. However, only the final version will be made publicly available. Draft versions may be provided to regulators if appropriate. In line with Council policy IAs should be retained for 7 years.**

<b>Service Area</b>	Housing Services	<b>Head of Service</b>	Nina Davies	<b>Director</b>	Nigel Brinn	<b>Portfolio Holder</b>	Cllr Myfanwy Alexander
<b>Proposal</b>	Reviewed adaptations policy for Council Housing						
<b>Outline Summary / Description of Proposal</b>							
<p>The proposed reviewed policy describes how the Council Housing Revenue Account (HRA) support its tenants and prospective tenants and their households with independent living. This is done through:</p> <ol style="list-style-type: none"> <li>I. allocating homes to prospective tenants</li> <li>II. adapting homes for current tenants</li> <li>III. assisting current tenants to move to suitable alternative homes</li> <li>IV. building or acquiring homes</li> </ol> <p>The reviewed policy puts more emphasis on the fact that adaptations is one of the options to meet the need of tenants and their household. This is not a policy change, but tenants and staff involved are expected to have a holistic view if providing medium and large adaptations is the best way to use housing stock, finance and meeting needs. It is expected that in the majority of cases the current home will be adapted.</p> <p>The policy reflects the reviewed common allocations scheme, including the accessible homes matching process.</p> <p>The reviewed policy now uses the terminology and financial thresholds from Welsh Government ENABLE guidance. The small adaptations limit is raised from £500 to £1,000. Small adaptations are delivered quickly and a thorough needs assessment is often not necessary. Medium adaptations cost between £1,000 and £10,000. Large adaptations cost over £10,000. Medium and large adaptations require a holistic assessment to decide if adapting the accommodation is the best way to meet the needs of the household. For medium and large adaptations, housing management considerations are made an integrated part of the decision making process. This should avoid costly adaptations where it would be better to offer alternative more suitable accommodation. The time scales for medium and large adaptations reflect the timescales suggested by Welsh Government.</p>							

### 1. Version Control (services should consider the impact assessment early in the development process and continually evaluate)

Version	Author	Job Title	Date
1	Henk Jan Kuipers	Housing Service Improvement Officer	28-03-2019
2	Henk Jan Kuipers	Housing Service Improvement Officer	17-09-2019
3	Henk Jan Kuipers	Housing Service Improvement Officer	01-10-2019
4	Henk Jan Kuipers	Housing Service Improvement Officer	22-11-2019

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2. Profile of savings delivery (if applicable)

2021-22	2022-23	2022-2023	2023-2024	2024-2025	TOTAL
£N/A	£	£	£	£	£

3. Consultation requirements

Consultation Requirement	Consultation deadline/or justification for no consultation
Public and Staff consultation required	<p>The original policy (May 2017) was subject to a public consultation. This review has been subject to a stakeholder consultation.</p> <p>All housing staff, Social Services Occupational Therapists and County Councillors have been consulted.</p> <p>Tenants’ Scrutiny Panel and Housing Services Group 100 have been consulted.</p> <p>Disability Powys / Age Cymru Powys / Credu have been invited to respond, but have not provided feedback.</p> <p>Two local access groups and two tenants of the “Breaking down barriers” group have been consulted.</p>

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### 4. Impact on Other Service Areas

**Does the proposal have potential to impact on another service area? (Have you considered the implications on Health & Safety, Corporate Parenting and Data Protection?)  
PLEASE ENSURE YOU INFORM / ENGAGE ANY AFFECTED SERVICE AREAS AT THE EARLIEST OPPORTUNITY**

Social Services Occupational Therapists have been consulted and support the policy.

### 5. How does your proposal impact on the council's strategic vision?

<b>Council Priority</b>	<b>How does the proposal impact on this priority?</b>	<b>IMPACT</b> Please select from drop down box below	<b>What will be done to better contribute to positive or mitigate any negative impacts?</b>	<b>IMPACT AFTER MITIGATION</b> Please select from drop down box below
<b>The Economy</b> <b>We will develop a vibrant economy</b>	Investment in accessible and community based lifetime accommodation	Good		Choose an item.
<b>Health and Care</b> <b>We will lead the way in effective, integrated rural health and care</b>	Wellbeing will increase by focussing on the needs of the individual, create accessible and suitable accommodation, protecting vulnerable people from injury, increase independency. Housing and Social Services work closely together.	Good		Choose an item.
<b>Learning and skills</b> <b>We will strengthen learning and skills</b>	No impact expected	Neutral		Choose an item.
<b>Residents and Communities</b> <b>We will support our residents and communities</b>	No impact expected	Neutral		Choose an item.

**Source of Outline Evidence to support judgements**

The HRA delivers around 1,000 small adaptations annually, costing on average £150.  
Medium / large adaptations

Report executive summary: the role of home adaptations in later life (2017); Jane Powell et al; Centre for Ageing Better

<https://www.ageing-better.org.uk/sites/default/files/2017-12/The%20role%20of%20home%20adaptations%20in%20improving%20later%20life.pdf>

“- There is strong evidence that minor home adaptations are an effective and cost-effective intervention for preventing falls and injuries, improving performance of everyday activities and improving mental health. Major adaptations have been less extensively studied, but the evidence shows that they can also support people in achieving these outcomes in some circumstances.

- 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.

- There is good evidence that greatest outcomes are achieved when individuals, families and carers are closely involved in the decision-making process, focusing on individual goals and what a person wants to achieve in the home.

- There is insufficient evidence at present to quantify the overall return on investment (ROI) from home adaptations. However, one aspect that has been measured is the ROI of home interventions in preventing falls on stairs. Preventive work to mitigate worse than average hazards associated with falls on stairs among households with an adult aged 65 or over would cost in the region of £290 million and confer a benefit to society of around £470 million, which corresponds to a positive ROI of 62p for every £1 and a payback period of less than eight months.

- Available evidence finds that delays in installing adaptations can reduce their effectiveness.

- There is good evidence that people can be put off installing adaptations until they reach a point of crisis, in part because they do not wish to change or ‘medicalise’ their home.”

Report executive summary: The cost-benefit to the NHS arising from preventative housing interventions (2016); Garret Helen, et al; IHS BRE Press

<https://www.brebookshop.com/samples/327646.pdf>

“This research has demonstrated some of the potential cost-benefit to the NHS of undertaking preventative, pro-active home interventions for households with a long term sickness or disability, where the risk of accidents in their home are significantly worse than the national average.”

6. How does your proposal impact on the Welsh Government’s well-being goals?

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Well-being Goal	How does proposal contribute to this goal?	<u>IMPACT</u> Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	<u>IMPACT AFTER MITIGATION</u> Please select from drop down box below
<b>A prosperous Wales:</b> An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.	Where appropriate local contractors will carry out adaptations works. The Council cannot guarantee that all works will be carried out by contractors based in Powys or employing local people. There are corporate procurement procedures that have to be followed.	Good		Choose an item.
<b>A resilient Wales:</b> A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).	No impact expected	Neutral		Choose an item.
<b>A healthier Wales:</b> A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood. <b>Public Health (Wales) Act, 2017:</b> Part 6 of the Act requires for public bodies to undertake a health impact assessment to assess the likely effect of a proposed action or decision on the physical or mental health of the people of Wales.	When tenants' needs are met they are less likely to injure themselves. It will reduce the fear of an injury, for example through a fall. It will increase independency and wellbeing. The housing service will provide and fund adaptations in line with the Housing Grants, Construction and Regeneration Act 1996.	Good	There may be additional adaptations that increase the wellbeing of residents, for which alternative funding may be sought by Social Services in line with the Social Services and Wellbeing (Wales) Act 2014.	Very Good
<b>A Wales of cohesive communities:</b> Attractive, viable, safe and well-connected Communities.	No impact expected	Neutral		Choose an item.

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Well-being Goal	How does proposal contribute to this goal?	<b>IMPACT</b> Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	<b>IMPACT AFTER MITIGATION</b> Please select from drop down box below
<p><b>A globally responsible Wales:</b>                      A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.</p> <p><b>Human Rights - is about being proactive (see guidance)</b></p> <p><b>UN Convention on the Rights of the Child:</b>                      The Convention gives rights to everyone under the age of 18, which include the right to be treated fairly and to be protected from discrimination; that organisations act for the best interest of the child; the right to life, survival and development; and the right to be heard.</p>	<p>An issue has been identified to be sensitive when asking people to move after the person that needs the adaptation has left. This is a delicate balance between addressing need of disabled people, efficient use of resources and the circumstances of the remaining household. The policy will be reworded to ensure the rights of the remaining household are respected, balanced with the need of the person in housing need that requires the adaptation.</p>	<p>Good</p>		<p>Choose an item.</p>
<p><b>A Wales of vibrant culture and thriving Welsh language:</b> A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.</p>				
<p><i>Opportunities for persons to use the Welsh language, and treating the Welsh language no less favourable than the English language</i></p>	<p>No impact expected</p>	<p>Neutral</p>		<p>Choose an item.</p>
<p><i>Opportunities to promote the Welsh language</i></p>	<p>No impact expected</p>	<p>Neutral</p>		<p>Choose an item.</p>
<p><i>Welsh Language impact on staff</i></p>	<p>No impact expected</p>	<p>Neutral</p>		<p>Choose an item.</p>
<p><i>People are encouraged to do sport, art and recreation.</i></p>	<p>No impact expected</p>	<p>Neutral</p>		<p>Choose an item.</p>
<p><b>A more equal Wales:</b> A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio economic background and circumstances).</p>				
<p><i>Age</i></p>	<p>Powys has an ageing population. Older people have more often than younger people a need for an adaptation. Addressing needs will have a positive impact on older vulnerable people.</p>	<p>Good</p>		<p>Choose an item.</p>
<p><i>Disability</i></p>	<p>Addressing the housing needs of disabled people helps to enable them to carry out day to day activities and remove barriers. Disadvantages are taken away.</p>	<p>Very Good</p>		<p>Choose an item.</p>

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Well-being Goal	How does proposal contribute to this goal?	<b>IMPACT</b> Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	<b>IMPACT AFTER MITIGATION</b> Please select from drop down box below
<i>Gender reassignment</i>	No impact expected	Neutral		Choose an item.
<i>Marriage or civil partnership</i>	No impact expected	Neutral		Choose an item.
<i>Race</i>	Gypsies and Travellers on Council sites. Privately owned caravans situated on Council sites are not eligible for adaptations under the Housing Grants, Construction and Regeneration Act 1996.	Poor	Gypsies and Travellers who have stopped travelling due to old age, ill-health or being disabled and are living on a Council owned site, should approach ASSIST to discuss their needs. OTs will recommend how the needs can be met. This is now added to the policy.	Good
<i>Religion or belief</i>	No impact expected	Neutral		Choose an item.
<i>Sex</i>	No impact expected	Neutral		Choose an item.
<i>Sexual Orientation</i>	No impact expected	Neutral		Choose an item.
<i>Pregnancy and Maternity</i>	No impact expected	Neutral		Choose an item.

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### Source of Outline Evidence to support judgements

Of 5121 introductory and secure tenancies, we know of 628 if they had a disability when they were last asked (12%). Of this number 69% stated that they have an impairment. From 88% of tenants we do not know if they have an impairment or not.

### 7. How does your proposal impact on the council's other key guiding principles?

Principle	How does the proposal impact on this principle?	IMPACT Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
<b>Sustainable Development Principle (5 ways of working)</b>				
<b>Long Term:</b> <i>Looking to the long term so that we do not compromise the ability of future generations to meet their own needs.</i>	Medium and large adaptations are provided with the aim to address a need for the next five years. If this is not possible or economical in the current Council home, than the Council will assist with finding suitable alternative accommodation.	Good		Choose an item.
<b>Collaboration:</b> <i>Working with others in a collaborative way to find shared sustainable solutions.</i>	A solution to meet the needs will be as much as possible be agreed between the tenant (and carer/household members), Housing Standards and Improvement Officer and Occupational Therapist.	Good		Choose an item.
<b>Involvement (including Communication and Engagement):</b> <i>Involving a diversity of the population in the decisions that affect them.</i>	The individual tenant (and carer/household members) will be part of the decision making process. The 2017 policy was subject to public consultation. This review has been subject to a stakeholder consultation.	Good		Choose an item.
<b>Prevention:</b> <i>Understanding the root causes of issues to prevent them from occurring.</i>	By looking at addressing needs holistically, including matching tenants with accommodation that suits their needs and does need as little work as possible. Avoiding adaptations in accommodation that is less suitable now or in the longer term.	Good		Choose an item.
<b>Integration:</b> <i>Taking an integrated approach so that public bodies look at all the well-being goals in deciding on their well-being objectives.</i>	The HRA works with the Private Sector Housing Team and Occupational Therapists to decide on the best solutions to address needs in the most effective way.	Good	A review of the small adaptations process and delivery is underway.	Good



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Principle	How does the proposal impact on this principle?	IMPACT Please select from drop down box below	What will be done to better contribute to positive or mitigate any negative impacts?	IMPACT AFTER MITIGATION Please select from drop down box below
<b>Preventing Poverty:</b> Prevention, including helping people into work and mitigating the impact of poverty.	Council tenants currently do not have to contribute financially to adaptations. Private tenants or home owners can apply for a grant and will be means tested.	Good		Choose an item.
<b>Unpaid Carers:</b> Ensuring that unpaid carers views are sought and taken into account	Unpaid carers are involved in the assessment process and their views taken into account.	Good		Choose an item.
<b>Safeguarding:</b> Preventing and responding to abuse and neglect of children, young people and adults with health and social care needs who can't protect themselves.	No impact expected	Neutral		Choose an item.
<b>Impact on Powys County Council Workforce</b>	There will be more emphasis in moving tenants if they live in unsuitable accommodation. Supporting individual tenants to move can be an intensive process. A support package will need to be developed.	Unknown		Choose an item.

### Source of Outline Evidence to support judgements

8. What is the impact of this proposal on our communities?

Severity of Impact on Communities	Scale of impact	Overall Impact
Low	Low	Low
<b>Mitigation</b>		

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A small number of people will be advised to move to more suitable accommodation, they will receive practical assistance and a discretionary disturbance payment of up to £2,000. There are ten households identified with a Personal Emergency Evacuation Plan. This means that they are not able to evacuate their property within 2.5 minutes during an emergency. A small number of households may be asked to move after they no longer need an adaptation. Expected to happen maybe once a year on average.

9. How likely are you to successfully implement the proposed change?

Impact on Service / Council	Risk to delivery of the proposal	Inherent Risk
Low	Low	Low
Mitigation		

Risk Identified	Inherent Risk Rating	Mitigation	Residual Risk Rating
People in unsuitable accommodation refusing to move. This will leave them in unsuitable accommodation; e.g. a single person living in a three-bed house, having difficulty using stairs. It is not expected there will be large numbers, but the impact on individuals can be serious. There are ten households identified that have a Personal Evacuation Emergency Plan.	Medium	The Council will not and cannot force people to move to more suitable accommodation under this policy. Each case needs to be well documented to evidence everything reasonable has been undertaken by the Council to offer alternative accommodation.	Low
People that sign an agreement, and it turns out the adaptation does not work for them may be reluctant to get back to the Council	Low	The policy is changed and does not include a requirement for a signed agreements.	Low
If a household does no longer need an adaptation, they may be asked to move. Especially after a bereavement or long period of living at the address, this can be very upsetting	Medium	The policy has been reworded to ensure the rights of the remaining household are respected, balanced with the need of the person that requires the adaptation.	Low
Overall judgement (to be included in project risk register)			
Very High Risk	High Risk	Medium Risk	Low Risk
			Low

10. Overall Summary and Judgement of this Impact Assessment?

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<b>Outline Assessment (to be inserted in cabinet report)</b>	<b>Cabinet Report Reference:</b>	
The proposed policy balances the needs of current and prospective tenants and their household with the HRA being cost effective and using housing stock efficiently.		

11. Is there additional evidence to support the Impact Assessment (IA)?

<b>What additional evidence and data has informed the development of your proposal?</b>

12. On-going monitoring arrangements?

<b>What arrangements will be put in place to monitor the impact over time?</b>
Performance and customer satisfaction is monitored in line with Welsh Government ENABLE guidance.
<b>Please state when this Impact Assessment will be reviewed.</b>
In three years' time or earlier if necessary.

13. Sign Off

Position	Name	Signature	Date
<b>Impact Assessment Lead:</b>	Henk Jan Kuipers		
<b>Head of Service:</b>	Nina Davies		
<b>Director:</b>	Nigel Brinn		
<b>Portfolio Holder:</b>	CLlr Myfanwy Alexander		

14. Governance

<b>Decision to be made by</b>	Portfolio Holder	<b>Date required</b>	February 2022
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# FORM ENDS

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