CEREDIGION COUNTY COUNCIL

Report to:	**Cabinet**
Date of meeting:	**1st February 2022**
Title:	**Amendments to the Private Sector Housing Grants and Loans Financial Policy for Ceredigion**
Purpose of the report:	**For Elected Members to be aware of and comment on the amendments to the policy document for issuing of grants and loans for private sector housing improvement**
For:	**For decision**
Cabinet Portfolio and Cabinet Member:	**Cllr Dafydd Edwards**

In March 2021 Welsh Government announced that all small and medium sized disabled adaptations would be available for all, that is, for the removal of the Test of Financial Resources. The Private Sector Housing Grants and Loans Financial Policy is amended to reflect Welsh Government's recommendation. Due to an increase in materials and labour, the maximum available assistance for both the small disabled adaptations (formally known as the Safe, Warm and Secure grant) and the Emergency Repair Assistance is increased to reflect this.
In addition to this, Welsh Government has increased the maximum amounts for the interest free loans administered by the Local Authority, and more detailed information on the interest free loans has been included.

In cases of Discretionary Disabled Grant top-ups that were greater than £15k, and special or unique circumstances, they were discussed at a Grants Panel Meeting. This has been amended to the decision being made in accordance with the delegated powers granted to the Corporate Lead Officer (as referenced within the Constitution) in consultation with the relevant Cabinet portfolio Member (pages 11, 16, 22 and 23).

These amendments have been included in the policy and are summarized as follows:

1. Amendments

- Page 9 – segregating the large DFG mandatory grant and the small and medium DFG discretionary grants
- Page 10 and 11 – segregating the large DFG mandatory grant and the small and medium DFG discretionary grants with maximum grant amounts
- Page 12 – Emergency Repair Assistance maximum assistance is increased from £3,000 to £5,000 plus VAT and fees
- Page 13 and 14 – Houses into Homes and Home Improvement Loan maximum value increased from £25,000 to £35,000 per unit, with conditions
- Pages 17 – As both small and medium adaptations will be discretionary funding, this will be closely monitored with Occupational Therapist or Occupational Therapist Assistant to use a priority system
- Pages 20 – details what works are considered as large type works
- Page 23 and 24 – introduces the DFG medium sized works, listing type of work, eligibility and conditions that apply.
- Page 24 and 25 – introduces the DFG small (formally known as Safe, Warm and Secure) sized works, listing type of work, eligibility and conditions that apply
- Page 28 and 29 – maximum assistance available for Emergency Repair Assistance increased
- Page 31 and 32 – Home Improvement Loan – maximum available amount increased with conditions in relation to rent for landlords
- Page 36 – Houses into Homes – maximum available amount increased with condition
- Page 38 onwards – Local Authority Loan Procedure attached

Note: There are no repayment conditions for both the small and medium sized adaptations. The adaptations involved in these grants, e.g. stairlift, level access shower, grab rails, ramps, do not tend to increase the value of the property.

Wellbeing of Future Generations:	**Has an Integrated Impact Assessment been completed?** Yes **If, not, please state why** ***Summary:*** **Long term:** **Collaboration:** **Involvement:** **Prevention:** **Integration:**
Recommendation(s):	**Members are asked to consider and agree to the proposed changes to the Private Sector Housing Grants and Loans Financial Policy for Ceredigion.**
Reasons for decision:	**To ensure the effective implementation of the Private Sector Housing Grants and Loans Financial Policy for Ceredigion.**
Overview and Scrutiny:	

Policy Framework:	**This Policy report aligns to priorities included within: Ceredigion Local Well-being Plan 2018 - 2023; Corporate Strategy 2018 - 2022; Housing For All: A Local Housing strategy for Ceredigion**
Corporate Priorities:	Boosting the Economy Enabling Individual and Family Resilience
Finance and Procurement implications:	Specific Capital Grant allocated
Legal Implications:	
Staffing implications:	None
Property / asset implications:	None
Risk(s):	None
Statutory Powers:	**Housing Grants, Construction and Regeneration Act 1996 (as applicable to DFGs), and the Regulatory Reform Order (Housing Assistance) (England & Wales) Order 2002 related to provision of financial assistance to private sector homeowners and tenants.**
Background Papers:	None
Appendices:	
Corporate Lead Officer:	Donna Pritchard
Reporting Officer:	
Date:	18.02.2022

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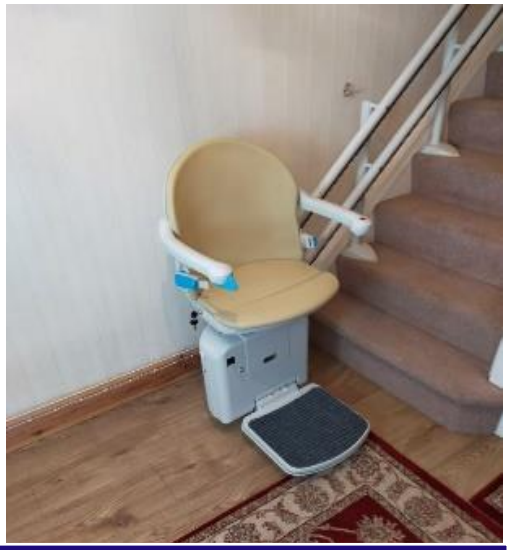

Housing Grants and Loans Financial Assistance Policy

December 2021

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1 INTRODUCTION

In July 2002 the Government made significant changes to housing grant legislation, introducing the Regulatory Reform (Housing Assistance) (England & Wales) Order 2002. This order allows local authorities to formulate their own flexible financial assistance policies to target their funding to address specific local needs and strategic priorities.

Disabled Facilities Grants now remain the only national mandatory grant, with all other types of assistance being at each Council's discretion.

With the introduction of the Regulatory Reform Order, before a Local Authority can provide any assistance under the order, an Authority must have adopted a policy for the provision of assistance, and give public notice of the policy[1]. In addition, they must ensure that a full copy of the policy is available at all reasonable times and available by post on payment of a reasonable charge. Any assistance must then be provided in accordance with the policy. Consequently, it is incumbent upon Local Authorities to ensure that their financial assistance policy is updated to reflect the terms of this scheme and any other assistance they offer.
The purpose for which assistance may be provided is set out in Article 3 of the order. That is for the purpose of improving living conditions in their area and Authorities may provide direct or indirect assistance to a person for the purpose of enabling him:

- to acquire living accommodation (whether within or outside their area) - only where the Authority has acquired or proposes to acquire (compulsory or otherwise his existing living accommodation) or are satisfied that the acquisition of other living accommodation would provide for that person a benefit similar to that which would be provided by the carrying out of work to his existing accommodation;
- to adopt or improve living accommodation (whether by alteration, conversion or enlargement);
- to repair living accommodation;
- to demolish buildings comprising or including living accommodation;
- where buildings comprising, or including, living accommodation have been demolished to construct buildings that comprise, or include, replacement living accommodation.

'Living accommodation' is defined in Part 2 of the Order as a building or part of a building, a caravan, a boat or similar structure, occupied or available for residential purposes.

The Order further states[2] that the 'assistance' may be provided in any form and may be unconditional or subject to conditions, including conditions as to the repayment of the

[1] Article 4 Regulatory Reform (Housing Assistance) (England and Wales) Order 2002
[2] Article 3 Regulatory Reform (Housing Assistance) (England and Wales) Order 2002

assistance or of its value (in whole or in part), or the making of a contribution towards the assisted work.

With the introduction of the **Wellbeing of Future Generations (Wales) Act 2015**, there is an increased focus on the local authority to improve the economic, social, environmental and cultural well-being of its residents. Through enabling the provision and improvement of housing, the local authority is therefore contributing towards a number of the seven wellbeing goals, including a prosperous Wales, a resilient Wales, a healthier Wales, a more equal Wales, and a Wales of cohesive communities.

A key new legislation that impacts on those who need assistance is the **Social Services and Well-being (Wales) Act** that came into force on 6 April 2016. The Act provides the legal framework for improving the well-being of people who need care and support, and carers who need support, and for transforming social services in Wales. The fundamental principles of the Act are:

Voice and control – putting the individual and their needs, at the centre of their care, and giving them a voice in, and control over reaching the outcomes that help them achieve wellbeing.

Prevention and early intervention – increasing preventative services within the community to minimise the escalation of critical need.

Well-being – supporting people to achieve their own well-being and measuring the success of care and support.

Co-production – encouraging individuals to become more involved in the design and delivery of services.

In addition, the Local Government Act 2000 created a discretionary power referred to as 'the well-being power' which enables Local Authorities to do anything that they consider is likely to promote or improve the economic, social or environmental well-being of their area and / or persons in it, provided that they are not restricted from doing so by other legislation[3].

However, Section 2 does not enable a Local Authority to do anything which they are unable to do by virtue of any prohibition, restriction or limitation on their powers which is contained in any enactment (whenever passed or made)[4].

Therefore, Local Housing Authorities must have regard to Section 24, Local Government Act 1988[5], (subject to Section 25) which provides the Local Housing Authority with the power to provide any person with financial assistance for the purposes of, or in connection with, the acquisition, construction, conversion, rehabilitation, improvement, maintenance or

[3] Section 2, Local Government Act 2000
[4] Section 3, Local Government Act 2000
[5] Section 24, Local Government Act 1988

management (whether by that person or by another) of any property, which is or is intended to be privately let as housing accommodation.

Private let as housing accommodation is defined 'at any time when it is occupied as housing accommodation in pursuance of a lease or licence of any description or under a statutory tenancy and the immediate landlord is a person other than a Local Authority'.

Section 25, Local Government Act 1988, states that consent from the Secretary of State or Minister is required for the provision of financial assistance, unless[6] the assistance or benefit is provided in exercise of any power conferred by Article 3 of the Regulatory Reform (Housing Assistance)(England and Wales) Order 2002[7].

Consequently, the broad nature of the Regulatory Reform (Housing Assistance)(England and Wales) Order 2002 and the general 'well being' powers contained in the Local Government Act 2000, means that Local Authorities will be able to provide financial assistance through the provision of discretionary grants and loan schemes to the full range of applicants and can attach such conditions or terms that they consider appropriate in the circumstances.

2 PURPOSE OF THE POLICY

The purpose of this policy is to identify priorities for housing capital investment, and to demonstrate how this investment will assist in contributing to the vision contained in the Council's Housing Strategy, Public Services Board Wellbeing Plan and the council's Corporate Strategy as well as any regional plans at both Mid Wales and/or West Wales level e.g. Growing Mid Wales (for regeneration) and/or West Wales Regional Planning Board (for Health and Social Care).
This Policy should be read in conjunction with these strategic plans and any other related documents.

Therefore this Policy provides information to the residents of Ceredigion on the financial assistance and advice service that may be available from the Council to ensure that housing is provided that is safe to live in, is energy efficient, and helps maintain residents' health and wellbeing. This policy is available to housing developers, private sector homeowners and tenants (subject to certain criteria) throughout the county.

This Policy will describe in detail:

- The full range of assistance that may be made available
- Who is eligible for this assistance
- The level of assistance being offered
- Legal conditions attached
- How they should make an application

[6] Section 25 (1)(f) Local Government Act 1988
[7] National Assembly of Wales Circular 20/02, Renewal Guidance

Assistance will be targeted at those households who by virtue of their age, disability or financial disadvantage or focused to targeted areas as defined by the Council as being in most need.

The intention with this policy therefore, is to outline the mandatory and discretionary grants and loans available from the local authority including the eligibility criteria, terms and conditions that the local authority places on those wishing to access this funding.

This Policy will replace those polices already in place for existing grants and loans the local authority currently offers, and will become operational from the 1st January 2022.

3 POLICY OBJECTIVES

This policy aligns with the strategic aims of the local Housing strategy which provides a firm foundation for dealing with the challenges facing housing and housing related services in Ceredigion. This Strategy recognises that good quality, affordable, and sustainable housing has the potential to make a positive and lasting impact on the health, economic vibrancy and community sustainability of Ceredigion. The strategy also sets out the current situation in terms of need, supply, access and affordability, as well as looking at housing standards, and Ceredigion's future requirements. Furthermore, this financial assistance policy enables the delivery of activities that contribute to the council's Corporate Strategy priorities specifically related to Enabling Individual and Family Resilience by 'promoting the wellbeing of individuals and families within safe, affordable and accessible homes.'

Therefore the key objectives of the Council's Financial Assistance Policy for Housing Grants and Loans are:

- To improve the condition and safety of housing in the County with the primary aim of improving the health and wellbeing of residents.
- To increase the provision of housing through improvement or conversion of existing buildings to residential use.
- To promote independent living by adapting properties within the County, enabling people with disabilities to remain in their own homes.
- To enable warmer and safer homes that a greater number of elderly and vulnerable residents of the County are able to remain in.
- To assist in reducing the number of households in fuel poverty by improving energy efficiency of home, whilst working on behalf of residents to attract external funding from a variety of sources (Welsh Government, Energy Suppliers etc) to minimize the cost of energy efficiency measures for homeowners .
- To make the best use of resources available to deliver housing improvements to those in most need.

4. KEY ISSUES

Culture Change – Due to diminishing capital funding available from Welsh Government in recent years, the availability of funding for housing grants has significantly reduced and ended in most circumstances. Therefore in order to maximise the available funding so as to ensure the continued improvement of housing stock within the county, there is a recognition that a more sustainable and effective use of scarce resources is needed. This policy therefore confirms the need to change the culture of grant aid by encouraging homeowners to maintain and repair their own homes, first and foremost, by their own means, using assistance from home improvement loans where available, and in particular circumstances for the vulnerable and/or elderly through the availability of grant aid.

Introduction of ENABLE – Support for Independent Living – From April 2016, Welsh Government launched ENABLE which brings together the current arrangements for delivering adaptations by building on the existing range of individual programmes and funding streams. It is designed to deliver the same simplified adaptations and a standardised service to individuals irrespective of their tenure. It does this by approaching the concept of delivering home adaptations to the user/client as falling into three broad categories or types – small, medium and large. Irrespective of tenure or how the adaptations are funded, the basic way in which the user will experience the delivery of their needed adaptations will follow one of these categories. Works defined within each category of adaptations include: There are three broad categories of assistance:

- "Small" e.g. grab rails and stair rails, lever taps. There will be no means test applied for this grant
- "Medium" e.g. adaptations such as walk-in showers, stair lifts and ramps. There will be no means test applied for this grant
- "Large" e.g. adaptations which require major structural changes to a property and/or extensions to it. There will be a means test applied to this grant

This policy amendment therefore incorporates these new categories of adaptations.

Loan Fund - WG support and encourage these innovative approaches including grant/loan mixes, loans and equity release. The provision of home improvement loans will provide valuable income, which can be reused by the Authority on repayment of the loan. Welsh Government supports this approach and has made available a number of loan products – Town Centre Loans, Houses into Homes, and Home Improvement Loans. These Schemes are seen as a way of providing additional finance to individuals and businesses for home improvements and conversions, which will contribute to the overall programme of improving the quality of homes and increasing housing supply. These funds are seen as a new way of providing finance to local authorities, instead of providing traditional grant funding. Local Authorities can borrow the funding from Welsh Government via 'financial transaction' funding that must be repaid to WG in an agreed period of time.

Safety Net - It is recognised that some form of direct financial assistance will be required where clearly vulnerable homeowners cannot help themselves by their own financial means. Direct financial assistance will be applicable for disabled facilities, and in order to deal with

emergency repair issues including works in default where the local authority has needed to step in to carry out works on behalf of the occupant/property owner.

Through Age Wellbeing Model - development of prevention and early intervention services – with the development and formalisation of integrated services for social care and health services, there is increasing focus being placed on ensuring that people are able to remain in their homes where possible. With this in mind, the suitability of these properties for householders in terms of adaptability and condition becomes increasingly important. This is being further reinforced by the duties contained within the Social Services and Wellbeing Act 2015.

The Council is currently pursuing large scale change to a new Through Age and Wellbeing Model. The vision of the model is 'To ensure every child, young person and adult in Ceredigion will be able to reach their full potential. To ensure fair access for all to excellent universal and targeted services that supports the health and wellbeing of all citizens. To develop skills and resilience that will last a lifetime and enable individuals to cope well with the challenges and pressures that they may face.' This further reinforces the focus on improving independence and access to services.

Empty Properties - There is a significant percentage of empty properties within the County. Empty properties are a wasted resource. A key proposal of the Council's Housing Strategy is to work closely with a partner to purchase, renovate and/or rent former empty properties.

Area based regeneration and/or energy efficiency schemes - It is clear that there are areas within the county that require a more strategic approach with regard to improving housing. Periodically, funding is made available such as Arbed Warm Homes that is aimed at improving the energy efficiency of the housing stock or in recognition of housing's key impact on area regeneration. The local authority endeavours to proactively apply for such funding in order to ensure that funding continues to be drawn into the area for housing and / or regeneration capital improvement.

5 FINANCIAL ASSISTANCE AVAILABLE AND CONDITIONS ATTACHED

The Council has a duty to consider all applications for Mandatory Disabled Facilities Grants (DFG) which are administered under the Housing Grants, Construction and Regeneration Act 1996 (as amended) and specific details of the grant are contained within that Act of Parliament and associated guidance. The council also provides four other grants for disabled facilities – a Disabled Facilities Assistance, a Relocation Grant, Disabled Facilities Grant (Medium works) and Disabled Facilities Grant (Small works). All applications for assistance will be subject to an assessment of need by members of the Council's Porth Cynnal and Porth Gofal. This policy provides criteria to ensure grants are awarded fairly and consistently.

The local authority is committed to ensuring recognition of the needs of ex-service personnel. This Policy for Disabled Facilities Grants will ensure that priority will be provided to those applications received from ex-service personnel where their disability is as a result of service in the Armed Forces.

Furthermore, to realise the objectives of this policy and thereby the wider strategic aims of the local authority's Corporate Objectives and Public Service Boards Wellbeing Plan and associated documents, the Council provide the following grant and loan assistance (those that are labelled 'discretionary' are subject to budget availability).

ENABLE – Large Adaptations (mandatory funding)

- Disabled Facilities Grant (Large)

ENABLE – Medium and Small Adaptations (discretionary funding)

- Disabled Adaptations Assistance
- Disabled Adaptations Grant (Medium)
- Disabled Adaptations Grant (Small)
- Relocation Grant

Emergency Home Repair (discretionary)

- Emergency Repair Assistance
- Lifetime Loan
- Health and Housing Ancillary Assistance

Housing Improvement Loans (discretionary)

- Home Improvement Loan (Safe Warm Secure)
- Houses into Homes Loan (Empty Property Loan Scheme)

The availability of all Grant or Loan assistance will be subject to the Council's annual budget setting procedure. All non-mandatory grants/loans are offered at the Council's discretion and the framework for these grants/loans is subject to this Policy.

Details of each grant/loan are attached in the Appendices.

Some grants and/or loans are awarded on condition that the applicant will repay the grant/loan amount in full to the Council if the property is sold or not occupied as intended within an agreed time period. Full details of the grant/loan conditions are issued direct to applicants, in writing, at the time that a grant/loan is approved.

The grant/loan condition period starts on the date that work is completed to the satisfaction of the Council. Dependent on the type of grant or loan product, charges are lodged with the Land Registry prior to the approval of a grant/loan or as a Local Land Charge when work has been completed (dependent on type and value of grant/loan).

A Local Land charge is registered against the property in respect of Grants and Loans less than £5,000 when work has been completed. This land charge will secure the funds provided by the local authority, and will bind the applicant and any successors in title. This charge will be registered in the local land charges register and thereafter registered with the Land

Registry. Any grant/loan paid over £5,000 will be registered directly as a Legal Charge with the Land Registry.

In certain circumstances waiver of grant/loan conditions can be considered. Decisions on any waiver of repayment are made by the Team Manager for housing grants and loans with agreement from the appropriate Corporate Lead Officer and Cabinet Member in conjunction with Financial Services; with discretion to take these decisions to a relevant Grants/Loan Panel when appropriate.

Disabled Facilities Grant conditions imposed under this Policy remain as defined in the Housing Grants, Construction and Regeneration Act 1996 and any associated Regulations made under this Act as well as detailed within this Policy. Whilst this Policy gives a guide to the conditions, detailed guidance and a statement of law is available with reference to this legislation.

For certain types of discretionary grants and loans, conditions are placed on grant/loan either through a local land charge or a full Legal Charge with the Land Registry, depending on the value of the loan/grant. The powers that enable the local authority to secure these charges are defined within the Regulatory Reform Order 2002, and will be outlined to grant/loan applicants within the Grant/Loan Offer letter/agreement. The offer of the grant/loan will be subject to the applicant agreeing that a local land charge or legal charge is secured on the property and any successors in title if repayment has not been made prior to this time.

5.1 Table of the Grant/Loan Conditions Grant Type	**Condition Period**	**Grant/Loan Conditions**
ENABLE ADAPTATIONS		
Mandatory Disabled Facilities Grant (Large)	10 years	Maximum Grant = £36,000 Applicant must remain living at the property as his her only residence for the duration of the grant condition. The services of the in-house home improvement service must be used for all mandatory DFGs. Adaptation assistance must be supported by an Occupational Therapist assessment and recommendation.

Disabled Adaptations Assistance (Discretionary)	On sale/transfer/disposal of the property	Maximum financial assistance £15,000 (with discretion to increase on agreement of the Grants Panel). NB this is not grant aid, but financial assistance provided for the duration of the recipient's occupancy of the property. Financial assistance repayable on sale/transfer of the property. Land Registry Charge will apply. The services of the in-house home improvement service must be used although exemptions may be considered. Adaptation assistance must be supported by an Occupational Therapist assessment and recommendation.
Discretionary Disabled Facilities Grant (Medium)	No condition	Maximum Grant = £36,000 The services of the in-house home improvement service must be used for all discretionary DFGs. Adaptation assistance must be supported by an Occupational Therapist, Occupational Therapist Assistanct or Trusted Assessors assessment and recommendation.
Discretionary Disabled Facilties Grant (Small)	No condition	Maximum Grant = £5,000 The applicant must live in the dwelling as their only or main residence. Adaptation assistance must be supported by an Occupational Therapist, Occupational Therapist Assistanct or Trusted Assessors assessment and recommendation.

Relocation Grant	10 years	Maximum Grant = £10,000 There is a presumption against the allocation of a Disabled Facilities Grant where the property is unsuitable in the long term to the applicant's needs. To assist the disabled person to move to a more suitable property where it is more cost effective than adapting the current home consideration will be given to meeting legal and removal costs in addition to adaptation costs.
Emergency Repair Assistance (Discretionary)		
Emergency Repair Assistance	On sale/transfer/disposal of the property	Maximum financial assistance = £5,000. NB this is not grant aid, but financial assistance provided for the duration of the recipient's occupancy of the property. The applicant must live in the dwelling as their only or main residence and have an owner's interest in the dwelling, or be a tenant of the dwelling alone or jointly with others and have a 'duty or power' to carry out the works in question (e.g. in the case of tenants, the landlord usually has the duty or 'repairing obligation' and not the tenant), or occupy the dwelling under a right of exclusive occupation granted for life. In respect of a mobile home the occupier must also satisfy a 3 year residential qualifying period.
Lifetime Loan	On sale/transfer/disposal of the property	Maximum loan = £15,000 For loans up to £5,000 a local land charge will be secured on the property that will bind the applicant and any successors in title. This charge will be registered in the local land charges register and thereafter registered with the Land Registry.

		For loans over £5,000 a Land Registry Legal Charge will be lodged.
Health and Housing Ancillary Assistance	On sale/transfer/disposal of the property	No maximum but availability is funding dependent. For loans up to £5,000 a local land charge will be secured on the property that will bind the applicant and any successors in title. This charge will be registered in the local land charges register and thereafter registered with the Land Registry. For loans over £5,000 a Land Registry Legal Charge will be lodged.
Grants no longer available although grant conditions are still in force:		
Special Initiative Grants (Aberystwyth Renewal Area only) a. Energy efficiency b. Conversion – single household use c. Conversion – self contained flats	10 years	The grant amount will be placed as a Local Land Charge on the property for a term of 10 years.
LOANS		
Houses into Homes (Empty Property Loan Scheme)	For the duration of the loan	Maximum loan = £25,000 per unit of accommodation Loans will be secured as first or second charge against the Land Registry Title. Maximum loan for where rents are based on the Local Housing Allowance Rate = £35,000 per unit of accommodation.

Home Improvement Loan	For the duration of the loan	Maximum loan = £35,000 per unit of accommodation For loans up to £5,000 a local land charge will be secured on the property that will bind the applicant and any successors in title. This charge will be registered in the local land charges register and thereafter registered with the Land Registry. For loans over £5,000 a Land Registry Legal Charge will be lodged.

5.2 Waiver of the Grant/Loan Conditions

In certain circumstances, the Council can exercise its discretion and can waive repayment of a grant/loan. Each case is considered on its own merits and it is the responsibility of the grant/loan applicant to prove that that there are legitimate reasons why the conditions cannot be adhered to. A decision will be made by the Corporate Manager responsible for adaptations grants and loans in conjunction with the appropriate Corporate Lead Officer and Cabinet Member in conjunction with Financial Services upon receipt of a written request accompanied by the required supporting documents.

Copies of the grant/loan conditions can be obtained from the Housing Service under Posrth Gofan and are specific to the type of grant/loan received.

Specific considerations made by the Council prior to enforcing repayment of large disabled facilities grant include that we are satisfied that it is reasonable to require the repayment and will consider the following in line with Housing Grants, Construction and Regeneration Act 1996/Disabled Facilities Grant (Conditions relating to approval or payment of Grant) General Consent 2008): -

- the extent to which the recipient of the grant would suffer financial hardship were the recipient to be required to repay all or any of the grant;
- whether the disposal of the premises is to enable the recipient of the grant to take up employment, or to change the location of the recipient's employment;
- whether the disposal is made for reasons connected with the physical or mental health or physical or mental well-being of the recipient of the grant or of a disabled occupant of the premises; and
- whether the disposal is made to enable the recipient of the grant to live with, or near, any person who is disabled or infirm and in need of care, which the recipient of the grant is intending to provide, or where the person to whom the recipient of the grant has moved to live with him or her intends to provide care of which the recipient of the grant is in need by reason of disability or infirmity.

- Furthermore, for discretionary DFGs consideration will be given on application by the applicant/member of the family if the conditions of the grant were enforced which would lead to unnecessary financial hardship; the disposal is made for reasons connected with the physical or mental health or physical or mental well-being of the recipient of the grant or of a disabled occupant of the premises/member of the family.

6 HOME IMPROVEMENT AGENCIES

It can often be difficult to locate a reliable building contractor, obtain estimates and commission plans. The Council therefore encourages grant/loan applicants to engage the Housing Service Supervisory Service, or Wales and West Care and Repair to help them through the grant process. Both the Council and Care and Repair can appoint contractors and oversee any grant aided work for clients to make the grant process as easy as possible.

Alternatively, suitably qualified architects or building surveyors can provide this service privately for grant applicants. Supervisory service fees (up to a maximum level) can be considered a grant eligible expense and included in the overall grant award amount.

6.1 Ceredigion Home Improvement Supervisory Service

To ensure services are accessible and enable effective take up of grants for all households including vulnerable and/or elderly households the Council offers a full in-house Supervisory service.

The majority of grant applications made to the Council are from elderly or vulnerable households and opting for the Council's Supervisory Service removes the worry and stress which might be experienced in applying for a grant and in supervising the work of a builder as work progresses.

In recent years, a high number of grant applicants have engaged the services of the Supervisory Service to act on their behalf. Staff will arrange proof of ownership, drawing of plans, making of statutory Planning and Building Regulation applications and carrying out all

the formalities of appointing (on the residents behalf) a suitable building contractor. Building work is carried out to an agreed timescale and is supervised by our qualified surveyors until it is completed to a satisfactory standard.

6.2 West Wales Care and Repair

The Council works closely with West Wales Care & Repair, which exists to assist older and disabled people to repair and improve their homes. Care and Repair specialises in helping residents over 65 years of age to access a variety of services. They also administer the Rapid Response Adaptations Programme, a Home Safety scheme, the Handyperson Scheme and they offer help and advice about benefits, home maintenance and potential benevolent funding.

Care & Repair also submit grant enquiries for their clients and can in some circumstances offer a service to appoint and oversee contractors who can carry out privately funded work.

The Council is pleased to be working in partnership with the Care and Repair Agency which provides valuable referral, information and advocacy services, integral to the aims of this policy. For further details please contact Care & Repair on 01970 639920.

7. GRANTS/LOANS CONSIDERED IN SPECIAL CIRCUMSTANCES

The Council recognises that there will be occasions when its general policy will not provide a framework for special or unique circumstances which arise. In such circumstances, it may be necessary to consider providing assistance outside the scope of the policy. Examples of when special circumstances may occur include improvement and repair of adjoining properties, adaptations, conversions, extensions, energy efficiency housing improvement schemes and rebuilding of retaining walls. Financial assistance awarded in special circumstances will be on officer recommendation only and must be agreed in advance via the Council's agreed Cabinet decision process by delegated authority contained within the Council's Constitution to the appropriate Corporate Lead Officer and/or Corporate Manager responsible for housing adaptations and loans; and the appropriate Cabinet Members for these services.

8. GRANT/LOAN ELIGIBLE WORK IN CEREDIGION

All grant/loan eligible work is determined by the Council's Housing Adaptations and Improvement, Housing Standards and Energy Efficiency Officers, who will produce a specification of eligible works in each individual case. The cost of work will be determined by using a standard schedule of rates, and comparing this with the receipt of builder estimates for this work. This will form the basis of the grant/ loan award. The exception to this is for Disabled Facilities Grants, where eligible works is recommended by an Occupational Therapist, Occupational herapist Assistant or Trusted Assessors in accordance with the needs of the applicant. In the delivery of Disabled Facilities Grants, the Council has undertaken a procurement process whereby all DFG are delivered by a dedicated corporate Minor Works Framework contract which is reviewed every two years. This enables the

Council to employ a dedicated contractor with the expertise and sensitivity required in carrying out the DFG's, which in turn ensures prompt delivery of a high standard of customer service. Where applicable, client contribution towards the cost of works will be calculated and notified in the approval process. The contributions will be collected in advance of the contract start, and held by the Council, to ensure swift payment upon completion of works.

In most cases only eligible work can be considered for grant/loan aid, and Council officers will be able to give applicants advice specific to their individual grant application dependent on property condition.

The homeowner can commission non grant/loan aided work at the same time, but would have to fund these costs themselves. The Council will not be responsible for any works carried out alongside, but not paid for by a grant or loan.

All work must be carried out to the specifications set out by the local authority and to the required standard in accordance with Building Control standards.

Energy efficiency works may be offered with other types of grant/loan assistance if appropriate, and works identified may attract grant/loan aid either from the Council , or via external funding sources which the Council may be able to identify and claim any funding available on the residents behalf. Advice will be given in each individual case.

Grant aid is **not** available toward the cost of furniture removal and storage, temporary alternative accommodation costs or redecoration such as wallpapering and painting or for replacement of decorative coving, dado rails, ceiling roses etc. following completion of essential repairs. The only exception to this is the Relocation Grant which can cover the cost of furniture, removal and storage.

Applicants need to consider any of these extra costs that they will be liable for before accepting the offer of grant and proceeding with the grant aided work.

9. FUNDING

Discretionary funding will be closely monitored and only available subject to available budget. Where the Occupational Therapist/Occupational Therapist Assistant has provided a recommendation, they will stipulate whether this is 'routine' or 'priority'. Schemes will be prioritised on this basis.

10. FEES & CHARGES

When making an application for grant assistance, applicants will incur fees and charges.
Fees and charges can include any fees the Council deem appropriate and include:

- planning and building control fees
- the preparation of plans
- structural surveys
- legal services

Fees for services will only be eligible for grant assistance if those services are essential to enable the formal grant approval to be completed.

When considering an application for assistance for discretionary grants, all appropriate and eligible expenses will be considered. In the case of the discretionary grants, maximum limits refer to the cost of works and appropriate fees will be awarded in addition to the total cost of works. In the case of the mandatory Disabled Facilities Grant, fees must be included in the maximum grant amount. The cost of work and all fees cannot exceed the grant maximum allowed for a mandatory grant.

Applicants must note that any fees, charges or expenses they incur as part of the grant application process will not be reimbursed unless appropriate invoices are provided and the grant application progresses through to completion of the works.

The Council also have discretion to only grant aid fees deemed reasonable, and may not cover the full cost if unreasonable or excessive fees are charged.

An applicant will be liable for any costs incurred if a grant application does not progress to completion.

With the introduction of Safe, Warm or Secure Home Improvement Loans, as part of these national schemes, the council is able to charge an administration fee for setting up and administering the loan (the value of this administration fee will be included in the council's fees and charges document published on the council's website for Home Improvement & Houses into Homes loans).

In order to encourage owner-occupiers to take up the Home Improvement loan product, it is intended that this fee will be paid by the local authority as a Loan Application Grant. This incentive will be dependent on availability of local authority funds for this purpose, and may be withdrawn at any time. In circumstances where landlords are also keen to work with the local authority in increasing the availability of affordable rental properties, an incentive is also available whereby fees for landlords will be waived if the property is offered for rent at the Local Housing Allowance rate for the duration of the loan period, and the landlord rents the property to tenants from the Council's Affordable Housing Register or otherwise a tenant who would be eligible to be on this Register. The landlord will be required to enter into a 'Nomination Rights' agreement.

Further information on fees, charges, further qualification requirements and conditions and a Loans Procudure are included with the respective details included in Appendices A-C below.

11. COMPLAINTS

The Council aims to meet the needs of all its customers. However, there may be times when a person may feel that he is not satisfied with the service he or she has received or the manner or decision taken with regard to their application. In such circumstances, complaints may be made through our formal complaints procedure either through social services or the Corporate Complaints Policy for further investigation and response. The intention is to proactively deal with complaints and seek early resolution where service users are dissatisfied with the outcome of our decision/action. As such, all complaints will receive a formal reply, in writing.

12. TRANSITIONAL ARRANGEMENTS & PREVIOUS POLICY

Full grant applications which have been formally approved or submitted to the Council to be determined prior to 1st January 2022 will be subject to the Policy in operation at the time that the grant was approved (Housing Grants and Loans Financial Assistance Policy April 2018 with amendments in subsequent years to reflect changes in policy).

Grant/loan enquiries that have been surveyed, a schedule of eligible works issued and a formal full grant application* invited prior to 1st December 2021 will be subject to the eligibility criteria of the previous policy. Enquiries in this category for all grants (other than Disabled

Facilities Grants) that do not submit all the required documentation to constitute a full application by the 1st January 2022 will be cancelled and will have to re-apply under the terms and conditions of this Policy.

Enquiry forms for all discretionary Grants that are accepted by the Council prior to 1st December 2021, but where no schedule has been issued will be subject to the eligibility criteria, terms and conditions of this Policy.

* A ‘full grant application’ is considered to be all the documentation required to allow the Council to formally determine (approve or refuse) the application. This documentation can include (where applicable) the application form , evidence of all income and savings, proof of ownership , future occupation certificate, contractors estimate, drawings etc together with any other specific information requested relating to the specific enquiry.

13. FURTHER POLICY DEVELOPMENTS

It is the intention of the Council to regularly review this policy to ensure that maximum benefits are delivered from the financial assistance made available by ensuring ‘added gain’ from the capital housing programme and loans funds made available from Welsh Government. This includes seeking all external investment opportunities, working with partners and providing financial assistance that achieves the maximum outcomes in the most cost effective manner.

Regular reviews will take into account changes in national and local strategic housing priorities, the uptake of grants and budgetary constraints.

Grants will also be evaluated to include Integrated Impact Assessments to identify the ‘added gain’ from the contribution to wider strategic objectives of the Council.

The Council is committed to continuous improvement within the existing/foreseeable financial constraints that are being imposed on the Local Authority.

APPENDIX A – ENABLE – Support for Independent Living
DISABLED FACILITIES GRANTS AND SAFE, WARM AND SECURE

MANDATORY DISABLED FACILITIES GRANT (DFG - Large)	
Purpose/key outcomes	DFGs are available for large works to adapt a property to suit the particular needs of a disabled person who resides at the property. Assistance is given to: • Facilitate access • Provide suitable facilities • Make a building safe for use • Make environmental improvements to enable the disabled person to safely live in their home. Large works include (but is not limited to): • Extension to the original property • External lifts • Works where there is structural works to the property including requirement for Building Regulations and Planning
Eligibility criteria (applicant)	To be offered grant aid: **Owner Occupiers**: must be a freeholder or leaseholder with at least 10 years of the lease remaining and the dwelling must be your only or main residence. **Tenants**: any tenant may apply for a disabled adaptation (subject to landlord consent). **Landlords**: where a tenant makes an application for a DFG, the landlords must be, or will be, a freeholder or leaseholder with at least 10 years of the lease remaining and the dwelling(s) is/are to be let on a permanent residential basis and not as a holiday home. A disabled person may make an application for a grant even if they fall outside the definitions above: each individual circumstance will be considered for grant assistance subject to an assessment of need from an occupational therapist and on application for grant assistance. **Financial Resources** Owner Occupiers and Private Tenants - The Statutory Test of Financial Resources as retained for Disabled Facilities Grants (HRGR 1996) applies. The amount of grant allocated will be the difference between the amount the applicant is assessed as being able to afford and the total cost of the eligible works.

	The total of the incomes of all the persons who are relevant to the application will be taken into account. Grants for children are not subject to a test of parents' financial resources. It is the disabled adult person residing at a property who is subject to the means test where they share that residence with an owner-occupier (who may/may not be related). The age of the applicant will not be taken into account.
Eligibility criteria (works)	Works of adaptation required to enable the occupier to remain within their home. Assistance is given to: • Facilitate access • Provide suitable facilities • Make a building safe for use • Make environmental improvements to enable the disabled person to safely live in their home. Eligible works will be determined subject to an assessment of need by the Council's Occupational Therapist.
Conditions	For all DFGs the local authority will place a local land charge on the property in accordance with the *Housing Grants, Construction and Regeneration Act 1996: General Consent 2008* that will remain in place for 10 years following the completion of the grant works. ▪ Relevant Disposal When applying for a grant or loan the applicants will be required to sign a Certificate of Intended Occupation stating that throughout the grant condition period of **10 years**, the applicant or a member of the family intends to occupy the dwelling as his/her only or main residence <u>Or</u> If the applicant is a landlord, that he/she intends to let the dwelling as a residence to someone unconnected with him/her and is in agreement with the works. There is a presumption that grant aid will be recovered in full by the local authority where this condition is breached. This is subject to, delegated authority vested in the Corporate Lead Officer, to

	potentially waive repayment within the condition period in certain justifiable cases. Scheduled works included in the grant approval must be completed within 12 months of the approval date. Additional Grant Conditions - Authority is delegated to the Corporate Lead Officer to determine whether whole or part of a grant repayment is justified in specific instances of non-compliance based normally on a percentage reclaim relative to the time remaining of the grant condition period. The Corporate Lead Officer also has further authority to determine whether a fraud investigation is warranted. In cases of suspected fraud or deception - It is the policy of the authority to actively pursue, identify and investigate suspected instances of fraud and deception. The Council advises that this grant is only available through the services of the Council's Adaptations In-house supervisory service.
Maximum	The maximum grant assistance available is £36,000.

DISCRETIONARY DISABLED ADAPTATIONS ASSISTANCE	
Purpose/key outcomes **Please note:** This funding is not grant aid, but financial assistance provided for the duration of the recipient's occupancy of the property and becomes repayable on sale/transfer of the property.	To provide top-up funding for works of adaptation that have resulted in the maximum limit of the DFG being exceeded. This can also be used instead of a mandatory DFG for those not qualifying for mandatory DFG due to failing the means test (or not being able to afford their contribution), but ineligible for HILs. This funding is available only in exceptional circumstances and by agreement by the council's Grants Panel in cases where a report and officer recommendation is for discretionary top up funding exceeding £15,000 where works are deemed essential to provide the necessary adaptations above the mandatory DFG limit. For top funding of less than £15,000, delegated powers is provided to the Corporate Manager Housing Services to consider each case.
Eligibility criteria (applicant)	As for mandatory DFGs but also may include those failing means test but not able to service home improvement loan repayments
Eligibility criteria (works)	As for mandatory DFGs, and on recommendation of the council's Occupational Therapist and Corporate Manager Housing.
Conditions	For all discretionary grants a Land Registry Legal Charge will be lodged to become repayable on sale or transfer of the property, for whatever reason, at whatever point in time.

	The Council advises that this grant is only available through the services of the Council's Adaptations In-house supervisory service.
Maximum	£15,000 (with the discretion to increase this in exceptional circumstances by consideration of the Grants Panel)

DISCRETIONARY DISABLED FACILITIES GRANT (DFG - Medium)	
Purpose/key outcomes	Discretionary DFGs are available for medium works to adapt a property to suit the particular needs of a disabled person who resides at the property. Assistance is given to: • Facilitate access • Provide suitable facilities • Make a building safe for use • Make environmental improvements to enable the disabled person to safely live in their home. Medium works include (but is not limited to): • Level access showers • Stairlifts • Ramps (moderate ramps where Building Control and Planning is not required)
Eligibility criteria (applicant)	To be offered grant aid: **Owner Occupiers**: must be a freeholder or leaseholder with at least 10 years of the lease remaining and the dwelling must be your only or main residence. **Tenants**: any tenant may apply for a disabled adaptation (subject to landlord consent). **Landlords**: where a tenant makes an application for a DFG, the landlords must be, or will be, a freeholder or leaseholder with at least 10 years of the lease remaining and the dwelling(s) is/are to be let on a permanent residential basis and not as a holiday home. A disabled person may make an application for a grant even if they fall outside the definitions above: each individual circumstance will be considered for grant assistance subject to an assessment of need from an Occupational Therapist, Occupational Therapist Assistant or Trusted Assessor and on application for grant assistance.

	Financial Resources Owner Occupiers and Private Tenants – This will not be subject to a Test of Financial Resources.
Eligibility criteria (works)	Works of adaptation required to enable the occupier to remain within their home. Assistance is given to: • Facilitate access • Provide suitable facilities • Make a building safe for use • Make environmental improvements to enable the disabled person to safely live in their home. Eligible works will be determined subject to an assessment of need by the Council's Occupational Therapist, Occupational Therapist Assistance or Trusted Assessor.
Conditions	The Council advises that this grant is only available through the services of the Council's Adaptations In-house supervisory service. There will be no repayment conditions on this grant.
Maximum	The maximum grant assistance available is £36,000.

Discretionary Disabled Facilties Grant (Small) - SAFE, WARM AND SECURE ADAPTATION GRANT	
Purpose/key outcomes	**Safe Warm and Secure /Minor Adaptations:** The Council aims to facilitate quick easy access through the grant system for the provision of minor and/or emergency adaptations. Small works include (but is not limited to): • Grab rails • Handrails • Paths • Level access door thresholds • Steps • Lever taps • Repairs to existing adaptations.
Eligibility criteria (applicant)	Safe Warm and Secure Grants are non means tested up to £5,000 (plus VAT and fees) for all clients. The Council cannot pay for the same adaptations/work twice.

	The Council cannot pay for extending a service contract beyond the initial period, or for carrying out a replacement of equipment where servicing and maintenance has not been kept up to date.
Eligibility criteria (works)	Safe Warm and Secure Assistance – Minor Adaptations could help provide the following: Minor adaptations such as grab rails, steps and ramps, lever taps, repairs to existing adaptations. Any other works of assistance at the discretion of the Council. Grant is available on the recommendation of Occupational Therapists, Occupational Therapist Assistants, Community Care Workers or trusted assessors.
Conditions	The Council advises that this grant is only available through the services of the Council's In-House supervisory service or on application by the applicant, consideration will be given to waive this condition. There will be no repayment conditions on this grant.
Maximum	Up to £5,000 plus fees plus VAT

RELOCATION GRANT (DFG)	
Purpose/key outcomes	There is a presumption against the allocation of a Disabled Facilities Grant where the property is unsuitable in the long term to the applicant's needs. The Authority will also offer assistance towards the relocation of a disabled person in appropriate circumstances i.e. where a property's adaptation costs are not reasonable or practicable, or else where adaptation of the existing property may not adequately meet the needs of the disabled person or their family/carer. Therefore, sometimes an Occupational Therapist may identify a homeowner whose needs cannot be met within their existing home. Adaptations at certain properties may not be practicable and this decision will be made in conjunction with the disabled adaptations service. In these circumstances, a client may be eligible for financial assistance to move from their current home to a more suitable property, which is either adapted to meet their needs or, where adaptations are practicable.

Eligibility criteria (applicant)	For owner occupiers a Relocation Grant will be offered alongside a DFG which will be subject to the same eligibility criteria, means test and post completion conditions as apply to the discretionary/mandatory Disabled Facilities grant. In determining the level of assistance consideration will be given to the feasibility and cost of adapting both the current and proposed property, and the market value of each of the properties. The disabled person and their spouse would be subject to a test of their financial resources to determine their financial contribution. In cases where the disabled person is a child, the parents or guardian who will have an owner's interest in the relocation property will be subject to the test of resources calculation.
Eligibility criteria (works)	The grant offered will not exceed the cost of adapting the current property. For private sector tenants assistance with removal expenses will be considered in cases of hardship. The grant can only be used to cover the costs related to moving house, for example: • estate agent's fees • solicitor's fees • removal costs • essential utility connection costs • deposit for a privately rented property In some cases, we may also consider helping with the cost of carpets and curtains and replacement of certain appliances. However, this will depend on the individual circumstances of each case. An assessment of the new property will be carried out by the Occupational Therapist in order to determine if the disabled person's daily living needs could be met at that property. In liaison with a Housing Adaptations and Improvement Officer, a determination of the cost of any adaptations necessary at the new property will be made.
Conditions	A charge will be lodged at the Land Registry on the new property as soon as possible after purchase of the property. In the event of a disposal of the property, within 10 years of the payment of the grant award, the grant will be repayable in its entirety.
Maximum	The maximum grant assistance available is £10,000.

APPENDIX B - DISCRETIONARY MAINTENANCE AND REPAIR ASSISTANCE GRANTS AND LOANS

Poor housing conditions are a major factor in older and/or vulnerable people suffering poor health and becoming dependent on community care.

However, with limited capital resources as a local authority, and an increasing elderly population, it is not possible to assist every older or vulnerable person.

Some older persons will have the ability and/or means to pay for maintenance of their own homes. With this in mind, grant and / or loan assistance will be targeted at those in greatest need. The Emergency Repair Assistance can assist elderly and /or vulnerable people with no other financial means to do so, to carry out essential repairs to their home. Furthermore, more recently funding has been made available to local authorities through the Home Improvement Loan and Houses into Homes Loan Schemes as a way of providing additional finance to individuals and businesses for home improvements, which will contribute to the overall programme of improving the quality of homes and increasing housing supply.

Furthermore, with the introduction of the WG Vibrant Viable Places regeneration programme, Town Centre Loans have been made available in order to target the number of vacant, underutilised and redundant sites and premises in town centres and to support the diversification of town centres by encouraging more sustainable uses for empty sites and premises. A specific housing element is included in this scheme to support the conversion of properties into living accommodation.

EMERGENCY REPAIR ASSISTANCE	
Purpose/key outcomes	**Emergency Repair Assistance**: The Council aims to provide financial emergency repair assistance to help with urgent works of repair, for the vulnerable and/or elderly. **Please note:** This funding is not grant aid, but financial assistance provided for the duration of the recipient's occupancy of the property and becomes repayable on sale/transfer of the property.

Eligibility criteria (applicant)	**For people over 65 years** - Owner occupiers over 65 years with savings of less than £15,000, - Tenants over 65 years with life interest or have a long lease in a property with savings of less than £15,000, OR - Owner occupier or tenants who are in receipt of a means tested benefit (or equivalent) - Clients needing palliative care and/or to enable early release from hospital. - **People over 18 and under 65 years of age -** will also be eligible to apply if they meet the following criteria: - Owner occupier, **OR** - Tenant who has a long lease, **AND** - be in receipt of a means tested benefit including: Income Support, income based Job-Seeker's Allowance, Income based employment and support allowance, Guaranteed Pension Credit, Housing Benefit, Council Tax benefit, Child Tax Credit or Working Tax Credit for which his/her income has been calculated to be less than the sum determined annually by DWP for means-tested purposes (currently £15,860 for 2011/12) or Universal Credit. **OR** - Applicants whose primary place of residence is at the property, but not in receipt of the income-related benefits above, will be subject to the *Reduction in Grant Regulation '*means test'. Applicants whose contribution is calculated as less than £1,000 (one thousand pounds) will be eligible and will contribute the calculated amount towards the cost of the works. - The applicant must live in the dwelling as their only or main residence and have an owner's interest in the dwelling, or be a tenant of the dwelling alone or jointly with others and have a 'duty or power' to carry out the works in question (e.g. in the case of tenants, the landlord usually has the duty or 'repairing obligation' and not the tenant), or occupy the dwelling under a right of exclusive occupation granted for life. In respect of a mobile home the occupier must also satisfy a 3 year residential qualifying period. A check will be carried out as to whether any relevant grants have been paid previously to ensure that not more than £5,000 plus fees plus VAT is given in any three year period for each type of grant (Emergency Adaptation and Emergency Repair) (subject to exceptions below). The Council cannot pay for the same work twice.

Eligibility criteria (works)	Repair works for serious, unexpected, and potentially dangerous situations requiring immediate action to a dwelling such as: - securing the basic fabric of the property from the entry of wind or rain - protecting the occupants from immediate exposure to danger - repairs to windows and doors - defective drainage - dangerous wiring Any other works of assistance at the discretion of the Council.
Conditions	This financial assistance becomes repayable on sale or transfer of the property. A local land charge will be placed that will bind the applicant and any successors in title. This charge will be registered in the local land charges register and thereafter registered with the Land Registry. The Council advises that this financial assistance is only available through the services of the Council's Home Improvement Supervisory service or on application by the applicant, consideration will be given to waive this condition.
Maximum	Up to £5,000 plus fees plus VAT in a 3 year period.

HOME IMPROVEMENT LOANS	
Purpose/key outcomes	These Home Improvement Loans are made available to support the following elements: • Substandard Housing (Cat 1 / Cat 2 Hazards / Welsh Housing Quality Standard); • Repair, Fire Safety or Security; • Empty Homes (Renovation / Conversion);
	• Energy Efficiency (ECO top up); • Group Repair Schemes / Envelope Schemes; • Private Rented Sector (Access Schemes); • Aids and adaptations for older or disabled people or DFG top up. This is not an exhaustive list and if the works contribute to making the property warm safe **or** secure, then it will fall within the terms of the scheme.

Eligibility criteria (applicant)	Owners of substandard houses and includes: • Owner occupiers • Landlords • Developers • Charities / Third Sector Priority must be given to homeowners and landlords. Priority must be given to landlords that offer affordable / social housing / nomination rights over market rent. The applicant must be able to afford the monthly loan repayments and will be subject to a financial assessment. Applicants must not: • Have adverse credit history which may include: • County Court Judgements (CCJ) • Individual Voluntary Arrangements (IVAs) • Debt Relief Order (DRO) • Bankrupt (within last 6 years) • Company Insolvency / Liquidation Owe any outstanding debt to the Local Authority at the time of making an application Applicants must not: • Have adverse credit history which may include: • County Court Judgements (CCJ) • Individual Voluntary Arrangements (IVAs) • Debt Relief Order (DRO) • Bankrupt (within last 6 years) • Company Insolvency / Liquidation Owe any outstanding debt to the Local Authority at the time of making an application
Eligibility criteria (works)	Any loan requiring works must contribute to making the property **Warm, Safe or Secure**. There is no requirement that the property must meet all of these criteria. The loan could be targeted at one key element. The loan scheme could be used to support the following elements: • Substandard Housing (Cat 1 / Cat 2 Hazards / Welsh Housing Quality Standard); • Repair, Fire Safety or Security; • Empty Homes (Renovation / Conversion); • Energy Efficiency (ECO top up); • Group Repair Schemes / Envelope Schemes; • Private Rented Sector (Access Schemes); • Aids and adaptations for older or disabled people or DFG top up.

Eligibility criteria (works)	This is not an exhaustive list and if the works contribute to making the property warm safe **or** secure, then it will fall within the terms of the scheme. There must be no Category 1 hazards (as defined by Housing Health and Safety Rating System HHSRS) after completion of works if the loan is a Landlord Loan, ie. The property is a rented property. Officers from the local authority will visit each property to determine eligible work and discuss the loan application process with the applicant.
Maximum Loan Periods	Owner Occupiers - maximum loan period up to 10 years; Landlords / Developers / Charities - maximum loan period up to 5 years. Loan period will be agreed on application, and will depend on the value of the loan and applicant's financial ability to repay.
Repayment terms	Loan repayment will be by monthly direct debit payments unless otherwise agreed during the application process. For owner-occupier loans the repayment period will be set to ensure a minimum repayment of £50/month with a repayment period agreed during the application process (up to a maximum of 10 years).
Conditions	Any loan offered, taking into account any existing mortgage cannot exceed 80% of the current property value. It is possible in certain cases for another property to be used as security for the loan. For loans up to £5000 a local land charge will be secured on the property that will bind the applicant and any successors in title. This charge will be registered in the local land charges register and thereafter registered with the Land Registry. This local land charge will also apply to those owner occupiers who receive the Loan Application Fee Grant and this charge will bind the applicant and any successors in title until such time as the loan is repaid. For loans over £5000 a Land Registry Legal Charge will be lodged that will bind the applicant and any successors in title. The property must remain fully insured against loss or damage, to full reinstatement value.
Maximum	<u>Owner Occupiers</u> Min £1,000 up to a Max £35,000 per unit

	<u>Landlords</u> Min £1,000 up to a Max £25,000 per unit – market rent Min £1,000 up to a Max £35,000 per unit – rents are based on the Local Housing Allowance Rate.
Loan Application Fee Grant for owner-occupiers	This can include the use of the supervisory service to oversee the works. Provided there is no default on the loan, or breach of grant conditions, the grant will not be repayable. The local authority has discretion to only approve the Loan Application Fee Grant in certain circumstances on consideration by the Corporate Manaher and Corporate Lead Officer.
Loan Fee Charges/cost	A one-off administration fee will apply that may be paid over the term of the loan or paid up front. All fees are subjectto change annually in line with the Council's Fees and Charges Policy. Fees correct at time of Policy approval, January 2022. **Owner Occupiers** Loan up to £5000 – fee of £650 Loan £5001 to £35,000 – fee of £1000 In the event of Loan Application Fee Grant not being available a maximum of £500 will be charged to the applicant. **Landlords** Loan up to £10,000 – fee of £1035 Loan £10,001 - £35,000 – fee of £1555 Loan over £35,000 – fee of £2278 These fees for landlords will be waived if the property is offered for rent at the Local Housing Allowance rate for the duration of the loan period, and the landlord rents the property to tenants from the Council's Affordable Housing Register or otherwise a tenant who would be eligible to be on this Register by entering into a Nomination Rights Agreement. **Supervisory Service** The Local Authority can provide a supervisory service for building works to ensure consistency in standards of workmanship and timely delivery of works. This will include measuring up the property to produce a scheme of work, including drawings where necessary, obtain quotes for the work, including for specialist equipment, and sort out any issues as they arise. The applicant may choose this service if they so wish at a charge of 10%.

	Alternatively the applicant is at liberty to secure their own contractors for the works. In this circumstance, the local authority will not be liable for the quality of the workmanship or follow up on defects following completion of the works.

LIFETIME LOANS	
Purpose/key outcomes	There may be occasion when a property is in such a condition (Cat 1 hazards) that it is not reasonable for the Council to allow the occupier to remain without works being undertaken. The Council has discretion to offer a Lifetime Loan for Category 1 hazards within the property.
Eligibility criteria (applicant)	Owner occupiers who cannot meet the affordability check for Home Improvement Loans but who do not qualify for Emergency Repair Assistance or have already been awarded the ERA maximum. Where eligible benevolent funding must be sought
Eligibility criteria (works)	Repair works for serious, unexpected, and potentially dangerous situations requiring immediate action to a dwelling such as: - securing the basic fabric of the property from the entry of wind or rain - protecting the occupants from immediate exposure to danger - repairs to windows and doors - defective drainage - dangerous wiring Works will be Category 1 (HHSRS) hazards only. Any other works of assistance at the discretion of the Council. Officers from the local authority will visit each property to determine eligible work and discuss the loan application process with the applicant.
Repayment terms	This financial assistance becomes repayable on sale or transfer of the property or if the applicant ceases to reside at the property. A local land charge or full legal charge will be placed that will bind the applicant and any successors in title. This charge will be registered in the local land charges register and thereafter registered with the Land Registry. The Council advises that this financial assistance is only available through the services of the Council's In-house supervisory service

	or on application by the applicant, consideration will be given to waive this condition. The loans are interest free until the time that they become repayable. Where any sum is required to be paid, but is not repaid in accordance with the loan conditions, a breach of conditions will have occurred. In such instances Ceredigion County Council may demand immediate repayment of the loan and interest will be charged at 5% above the Bank of England base rate.
Conditions	The Council may consider the availability of equity in the property when determining the amount of loan to award. For loans up to £5,000 a local land charge will be secured on the property that will bind the applicant and any successors in title. This charge will be registered in the local land charges register and thereafter registered with the Land Registry. For loans over £5,000 a Land Registry Legal Charge will be lodged that will bind the applicant and any successors in title. This charge will be registered in the local land charges register and thereafter registered with the Land Registry.
Maximum	£15,000 inclusive of VAT (with the discretion to increase this in exceptional circumstances by consideration of the Grants Panel)
Loan Fee Charges/cost	No administration fee will be charged for this Loan.

HOUSES INTO HOMES (EMPTY PROPERTIES) LOAN	
Purpose/key outcomes	Houses to Homes is a Welsh Government initiative designed to bring empty homes (min 6 months empty) back into use for sale or rent. Finance may be used for: • loans to return a property to use to sell - these loans would have a maximum 2 year repayment period • loans to return a property to use for rent - these loans would have a maximum 5 year repayment period
Eligibility criteria (applicant)	Loans can be offered to individuals (expected 3 months pay slips), charities (3 years accounts), companies/ businesses (3 years accounts). Loans are not available for people wanting to renovate the property and live in it as their principal home (see Home Improvement Loans).

Eligibility criteria (works)	Works required for the renovation and improvement of single properties or the conversion of empty properties into a number of units, so that they are suitable for use as residential accommodation. Funding will be available up front before works start, providing owners with working capital.
Repayment Terms	This will depend on what is the intention with the property on completion of the works. • If renovating a single property, which is to be sold, the loan must be repaid when the property is sold or up to two years from the date of the loan approval, whichever is the sooner. • If converting a property into a number of units, which are to be sold on completion of the works, it is expected that the loan must be repaid on sale of the first unit, or two years, whichever is the sooner. However we will endeavour to arrange a mutually agreeable repayment schedule. • If the property/units are to be made available for letting the loan must be repaid within 3 years from the date of the loan approval. • All loans can be repaid earlier if the applicant wishes to do so. The loans are interest free, providing there is no default on the loan. • Where any sum is required to be paid, but is not repaid in accordance with the loan conditions, a breach of conditions will have occurred. In such instances Ceredigion County Council may demand immediate repayment of the loan and interest will be charged at 5% above the Bank of England base rate.
Conditions	Loans will be secured as first or second charge against the Land Registry Title. Loans can only be made available for properties that have been empty for at least six months or more. Any loan offered, taking into account any existing mortgage cannot exceed the following Loan to Value rates. Up to £25,000 loan - 80% LTV £25,001 - £100,000 loan – 75% LTV and £100,001 - £250,000 loan – 70% LTV. The Council may give consideration in certain cases for another property to be used as security for the loan. Applicant must carry out the conversion/repair works within an agreed time period.

	• The property/units must be marketed for sale or for let within a reasonable period of time after completing the works (12 weeks). If the property/units are available for rent and are not occupied within this time period, then the loan may become repayable. • The loan must be repaid either on or before the date as specified in your Loan Facility Agreement. The property must remain fully insured against loss or damage, to full reinstatement value.
Maximum	<u>Market rent properties</u> Min £1,000 up to a Max £25,000 per unit. <u>Local Housing Allowance rent properties</u> Min £1,000 up to a Max £35,000 per unit. Landlord will need to enter into a Nomination Rights agreement or the PRS Lease scheme.
Loan Fee Charges	All fees are subject to change annually in line with the Council's Fees and Charges Policy. Fees correct at time of Policy approval, January 2022. Loan up to £10,000 – fee of £1035 Loan £10,001 - £35,000 – fee of £1555 Loan over £35,000 – fee of £2278 The~~se~~ fees for landlords will be waived if the property is offered for rent at the Local Housing Allowance rate for the duration of the loan period, and the landlord rents the property to tenants from the Council's Affordable Housing Register or otherwise a tenant who would be eligible to be on this Register by entering a Nomination Rights Agreement. **Supervisory Service** The Local Authority can provide a supervisory service for building works to ensure consistency in standards of workmanship and timely delivery of works. This will include measuring up the property to produce a scheme of work, including drawings where necessary, obtain quotes for the work, including for specialist equipment, and sort out any issues as they arise. The applicant may choose this service if they so wish at a charge of 10%. Alternatively the applicant is at liberty to secure their own contractors for the works. In this circumstance, the local authority

	will not be liable for the quality of the workmanship or follow up on defects following completion of the works. Building/planning fees and RICS evaluation fees (if required) are not included and should be paid by the applicant.

HEALTH AND HOUSING ANCILLARY ASSISTANCE	
Purpose/key outcomes	Discretionary assistance to enable independent living where other grant and loan products do not cover costs due to limitations in criteria. Financial assistance is dependent on availability of appropriate funding avenues such as Integrated Care Funding. Examples of qualifying items include; - clearance of property in hoarding cases - temporary accommodation to facilitate works - connection of services - other public health matters This funding is offered at the discretion of the Team Manager only. **Please note:** This funding is not grant aid, but financial assistance provided for the duration of the recipient's occupancy of the property and becomes repayable on sale/transfer of the property.
Eligibility criteria (applicant)	Vulnerable clients who cannot access other funding sources.
Eligibility criteria (works)	Works which are necessary for the health/ safety of the occupant or other persons in proximity to the deficiency identified but cannot be fulfilled by other grant and loan products. Officers from the local authority will visit each property to determine eligible work and discuss each case with Team Manager.
Conditions	Local Land Charges or Land Registry Legal Charge will be lodged to become repayable on sale or transfer of the property, for whatever reason, at whatever point in time.
Maximum	Subject to available funding.

APPENDIX C – LOCAL AUTHORITY LOANS PROCEDURE

Local Authority Loans

Powers to award loans

The Regulatory Reform (Housing Assistance) (England & Wales) Order 2002 allows Local Authorities to formulate funding policies to address specific local needs and strategic priorities in improving living conditions. A policy must be in place/ adopted before any assistance can be issued.

Assistance may be provided in any form and may be unconditional or subject to conditions, including conditions as to the repayment of the assistance or of its value (in whole or in part), or the making of a contribution towards the assisted work. (As set out in local policy).

In addition the Local Government Act 2000 created a discretionary power referred to as 'the well-being power' which enables Local Authorities to do anything that they consider is likely to promote or improve the economic, social or environmental well-being of their area and / or persons in it, provided that they are not restricted from doing so by other legislation.

Consequently, the broad nature of the Regulatory Reform (Housing Assistance)(England and Wales) Order 2002 and the general 'well-being' powers contained in the Local Government Act 2000, means that Local Authorities will be able to provide financial assistance through Loan Schemes to the full range of applicants and can attach such conditions or terms that they consider appropriate in the circumstances.

Further information including eligibility can be found in the Housing Grants and Loans Financial Assistance Policy as agreed by cabinet 8th May 2018.

Financial Conduct Authority

The FCA regulates the provision of mortgages and conduct of parties engaged in regulated mortgage activity. Local Authorities are excluded from needing FCA permission for most consumer credit activities, but may still need permission for some types of lending.

Securing a 'land mortgage' over the property, either by legal charge registered with the District Land Registry or a local land charge (ie. a regulated mortgage) puts the regulation of the service under the Financial Services and Market Act 2000.

However, under the Financial Services and Market Act 2000 (exemption) (Amendment) (No.2) Order 2003 Local Housing Authorities offering mortgages have been exempt from the FCA regulatory regime, on the basis that a comparable quality service is provided to the client.

To ensure that Local Housing Authorities are able to meet the requirement of providing a comparative service, the LA should seek to follow the National Assembly of Wales issued Circular 20/02 (Renewal Guidance) and the Mortgage Sales Guidance for Local Authorities and Housing Associations 2000.

Distance selling

Where an LA provides a loan/ mortgage without any face-to-face contact with the customer at any stage this is classed as 'distance selling' and further information and regulations apply. *As set out in Distance Marketing Directive and incorporated within UK legislation via the Financial Services (Distance Marketing) Regulations 2004.*

In order to ensure this is not applicable, the LA must have a face-to-face meeting with the customer to discuss the loan/ mortgage.

Mortgage Administration Standards

1. Lending business must be conducted in an honest and responsible way, with due care and skill.
    a. LA's should have in place a policy identifying eligibility criteria and produce a document clearly showing this for customers.
    b. Lending procedure must be undertaken by a trained member of staff.
    c. Interview methods must not leave customers feeling pressurised into taking out a mortgage to fund home improvement works.
    d. Lending procedures must not result in any unfair treatment of customers.
    e. Lending procedures must not give rise to any conflict of duty with customers.
    f. Before giving any assistance the LA must be satisfied that the person has received appropriate advice or information about the extent and nature of any obligation (financial or otherwise) that they will be taking on.

2. Lending procedures must recognise the interests of the customer and treat them fairly.
    a. Clear information on the terms of the loan should be given in advance.
    b. Customers should be given time to consider whether this product is right for them, before signing documents.
    c. LA must be satisfied that customers are fully aware of any financial commitment they are entering into

3. All contact and communication with customers must be clear, fair and not misleading.
    a. Contact includes oral and written, telephone calls, face to face and correspondence (letters, emails).
    b. Customer should receive written information about the product being offered. (Guidance document) This should include; who is providing the loan/ mortgage; fees; refund policy; complaint procedure. (Prescribed information).
    c. Guidance document should be given at an early stage/ first contact.
    d. Includes the availability of the loan or other products available through the lender which may be suitable.
    e. On offer of loan/ mortgage, the customer should be given Mortgage Offer Document. This should include; customer name; date it was produced and how

long the offer is valid for; how to accept; what assistance has been given; fees applicable; amount of mortgage; repayments; value of property for security; interest rate; disposal terms/ risks; length of mortgage; total cost of mortgage; contact details. (Prescribed information)

4. Reasonable care must be taken to ensure that any mortgage offered to the customer is suitable for them, based on their needs and circumstances.
    a. The LA must take reasonable steps to obtain from a customer all information necessary to assess whether the loan is suitable. Eg. Ownership capacity (personal/ business etc.), other secured debt, financial situation of applicant etc.
        i. Customer can afford to take out the loan/ mortgage, consider income/ expenditure and likely changes in the future
        ii. Loan/ mortgage meets customers needs and circumstances
        iii. Customer meets eligibility requirements
        iv. For Lifetime Loan, customers future needs and plans eg. Moving, or his/ her wishes for the estate.

Please refer to the National Assembly of Wales issued Circular 20/02 (Renewal Guidance) and the Mortgage Sales Guidance for Local Authorities and Housing Associations 2000 for more information.

State Aid

State Aid should only need to be considered for Landlord loans. The current de minimis thresholds are EUR 200,000 (approx. £163,500) over a three year period. The aid component is not the loan itself (which must be repaid) but the advantage conferred on the borrower through not having to pay interest on the loan. Consequently, the amount of aid for each transaction would be counted as the present value of the interest that would be charged by a commercial lender. Provided that figure, plus the amount of any other state aid received by the borrower in the three years before the aid is given, does not exceed 200,000 Euros / £163,500 from all sources of public sector aid, then the de minimis rules can apply. The benefit of such a loan under these schemes is well below the current threshold.

Statement of state aid implications should be given to landlord/ developer applicants.

Current Loan Products

This procedure can be adapted to include new loan sources should the Local Authority be in a position to offer them.

Current products include:

- Emergency Repair Assistance
- Home Improvement Loan
- Houses into Homes Empty Property Loan
- Lifetime Loan

Process steps

	Emergency Repair Assistance	Lifetime Loan	Home Improvement Loan	Houses into Homes Loan	Town Centre Loan (not currently available)
Enquiry received.					
Initial letter or email sent including conditions/ info. (Guidance document)	X		X	X	
Visit to property to determine works and chat through loan face to face. Discussion should take place with applicant to confirm when the finance is repayable. Explain the process of application and securing the charge. Confirm ownership.	X	X	X	X	
HHSRS carried out at the dwelling to identify Cat 1 hazards	X	X			
Schedule of works to remedy Cat 1 hazards at dwelling. Source quotations using Councils Minor Works Framework.	X	X			
Complete application form with applicant	X	X			
Application received					
Check proposed works match purposes	X	X	X	X	
Verify application[1] (first officer) (refer to financial assessment stages)		X	X	X	

Verify application [8] (second officer) (refer to financial assessment stages)	X	X	X	X	
Ownership status should be confirmed with Land Registry Title and consideration given to any other charges (mortgages) secured on the dwelling.	X	X	X	X	
Company applications to be referred to Finance for assessment.			X	X	
Check property insurance in place			X	X	
Approval of Loan to take place.	X[9]	X[2]	X	X	
Legal Charge document to be drawn up.		X	X	X	
Loan agreement document to be drawn up.			X	X	
Documents[10] to be sent to applicant, with cover letter of further explanation. Applicant to be encouraged to source independent advice. Signing of Documents will need to be witnessed by third party.		X	X	X	
Obtain signed agreement from Corporate Managers Housing and Finance		X	X	X	
Returned documents[11] to be sent up to Legal for signing/ sealing on behalf of Council and registration of charges. Once this is in place, return one copy to applicant for safe keeping.		X	X	X	
Instruct contractor and check works on completion before payment.	X	X	X [12]		
Register costs with Local Land Charges	X	X [13]			
Payment to be sent to Finance. Copies of documents to be saved in shared folder. Finance will monitor repayments etc.	X	X	X	X	

[8] Check ownership, costs of work, financial assessment, ID forms, viability/ due diligence, security options, debts with CCC, fee recieved. See financial assessment stages for further information.

[9] Approval document to contain conditions, and reference to the approval being subject to charges being secured.

[10] Mortgage Offer Document, Loan Agreement, Legal Charge, Direct Debit

[11] Legal Charge, Loan Agreement, Land Registry Title, ID1 form, Mortgage company agreement/ Deed of priority, Manager agreement document. Legal services to register Land Registry charge and Companies House, if applicable.

[12] Only instruct contractor for Home Improvement Loan if Supervisory Service is used.

[13] Where costs are under £5000

NOTE: Loans above £100,000 should be subject to a Panel assessment protocol, to include input from Corporate Managers; Housing and Finance and assessing officers in both services.

Financial assessment stages

In order to minimise risk and carry out due diligence in assessment of applications for loan funding a stepped approach to financial assessment is carried out in line with the below.

Owner occupier application - Loan amount up to £25,000 Home Improvement Loan	
Affordability form	Check against bank statements and wage slips provided to ensure the additional loan payments can comfortably be met. (Responsible lending) If not, consider altering loan amount, repayment time frame or alternative financing.
Loan to Value	Maximum 80% (using current value and accounting for other mortgage/ secured lending)
Security	First or second charge on property being renovated
Insurance	Check house insurance in place, against loss or damage, to full reinstatement value
Debt check	Carry out debt check with debtors and council tax in relation to applicant and property. Debts must be resolved prior to approval.
Payment of funds	On Invoice, after works, stages if required
Repayment	Monthly at min £50/ month over max 10 years

Individual Landlord - Loan amount up to £25,000 Home Improvement, Houses into Homes	
Affordability form	Home Improvement Loan Check against bank statements and wage slips provided to ensure the additional loan payments can comfortably be met. (Responsible lending)

	If not, consider altering loan amount, repayment time frame or alternative financing. Houses into Homes Empty Property Loan Equity check Ability to complete scheme
Loan to Value	Maximum 80% (using current value and accounting for other mortgage/ secured lending)
Security	First or second charge on property being renovated or alternative property where ownership is the same.
Insurance	Check property insurance in place, against loss or damage, to full reinstatement value
Debt check	Carry out debt check with debtors and council tax in relation to applicant and property. Debts must be resolved prior to approval.
Payment of funds	Home Improvement Loan On Invoice, after works, stages if required Houses into Homes Empty Property Loan Up front after loan secured
Repayment	Home Improvement Loan Monthly at min £100/ month over max 5 years Houses into Homes Empty Property Loan Lump sum at end of term. (2y sale, 5y rent) Or upon sale if earlier

Individual /Landlord - Loan amount £25,001 - £100,000 Houses into Homes	
Affordability	Houses into Homes Empty Property Loan

	Equity check Ability to complete scheme
Loan to Value	Maximum 75% (using current value and accounting for other mortgage/ secured lending)
Security	First or second charge on property being renovated or alternative property where ownership is the same.
Insurance	Check property insurance in place, against loss or damage, to full reinstatement value
Debt check	Carry out debt check with debtors and council tax in relation to applicant and property. Debts must be resolved prior to approval.
Payment of funds	Houses into Homes Empty Property Loan Up front after loan secured, but release in stages/ tranches along with progress
Repayment	Houses into Homes Empty Property Loan Lump sum at end of term. (2y sale, 5y rent) Or upon sale if earlier

Individual /Landlord - Loan amount £100,001 - £250,000 **Houses into Homes** **PANEL ASSESSMENT**	
Affordability	Houses into Homes Empty Property Loan Equity check Ability to complete scheme
Loan to Value	Maximum 70% (using current value and accounting for other mortgage/ secured lending)
Security	First or second charge on property being renovated or alternative property where ownership is the same.

Insurance	Check property insurance in place, against loss or damage, to full reinstatement value
Debt check	Carry out debt check with debtors and council tax in relation to applicant and property. Debts must be resolved prior to approval.
Payment of funds	Houses into Homes Empty Property Loan Up front after loan secured, but release in stages/ tranches along with progress
Repayment	Houses into Homes Empty Property Loan Lump sum at end of term. (2y sale, 5y rent) Or upon sale if earlier Ability to require staged repayments is necessary

Business/ Company application - Loan amount up to £25,000 Houses into Homes	
Accounts	Finance to carry out assessment of business/ company to include a review of the two most recent full year Statement of Accounts, to include a full Profit & Loss account and Balance Sheet. The assessment will aim to ensure the business is sustainable, has the capacity to undertake the proposed development, ability to service the loan and doesn't have any cash flow issues. Where possible a Dun & Bradstreet Business Credit report will be also be used in conjunction with the Statement of Accounts to evaluate the financial health of the business. Where a business is a registered limited company information available from Companies House and any other public source will also form part of the assessment.
Loan to Value	Maximum 80% (using current value and accounting for other mortgage/ secured lending)

Security	First or second charge on property being renovated or alternative property where ownership is the same.
Insurance	Check property insurance in place, against loss or damage, to full reinstatement value
Debt check	Carry out debt check with debtors and council tax in relation to applicant and property. Debts must be resolved prior to approval.
Companies House	Charge registered against business entity with Companies House
Payment of funds	Houses into Homes Empty Property Loan Up front after loan secured
Repayment	Houses into Homes Empty Property Loan Lump sum at end of term. (2y sale, 5y rent) Or upon sale if earlier

Business/ Company application - Loan amount £25,001 - £100,000 Houses into Homes	
Accounts	Finance to carry out assessment of business/ company to include a review of the two most recent full year Statement of Accounts, to include a full Profit & Loss account and Balance Sheet. The assessment will aim to ensure the business is sustainable, has the capacity to undertake the proposed development, ability to service the loan and doesn't have any cash flow issues. Where possible a Dun & Bradstreet Business Credit report will be also be used in conjunction with the Statement of Accounts to evaluate the financial health of the business. Where a business is a registered limited company information available from Companies House and any other public source will also form part of the assessment.

Loan to Value	Maximum 75% (using current value and accounting for other mortgage/ secured lending)
Security	First or second charge on property being renovated or alternative property where ownership is the same.
Insurance	Check property insurance in place, against loss or damage, to full reinstatement value
Debt check	Carry out debt check with debtors and council tax in relation to applicant and property. Debts must be resolved prior to approval.
Companies House	Charge registered against business entity with Companies House
Payment of funds	Houses into Homes Empty Property Loan Up front after loan secured Staged payments as works progress
Repayment	Houses into Homes Empty Property Loan Lump sum at end of term. (2y sale, 5y rent) Or upon sale if earlier

Business/ Company application - Loan amount £100,001 - £250,000 **Houses into Homes** **PANEL ASSESSMENT**	
Accounts	Finance to carry out assessment of business/ company to include a review of the two most recent full year Statement of Accounts, to include a full Profit & Loss account and Balance Sheet. The assessment will aim to ensure the business is sustainable, has the capacity to undertake the proposed development, ability to service the loan and doesn't have any cash flow issues. Where possible a Dun & Bradstreet Business Credit report will be also be used in conjunction with the Statement of Accounts to evaluate the financial health of the business.

	Where a business is a registered limited company information available from Companies House and any other public source will also form part of the assessment.
Loan to Value	Maximum 70% (using current value and accounting for other mortgage/ secured lending)
Security	First or second charge on property being renovated or alternative property where ownership is the same.
Insurance	Check property insurance in place, against loss or damage, to full reinstatement value
Debt check	Carry out debt check with debtors and council tax in relation to applicant and property. Debts must be resolved prior to approval.
Companies House	Charge registered against business entity with Companies House
Payment of funds	Houses into Homes Empty Property Loan Up front after loan secured Staged payments as works progress
Repayment	Houses into Homes Empty Property Loan Lump sum at end of term. (2y sale, 5y rent) Or upon sale if earlier Ability to require staged repayments is necessary

To further mitigate risk against non-repayment/ default, a buffer is to be maintained of £100,000 across loan pots, from the original grant funding.

Cyngor Sir Ceredigion County Council - Integrated Impact Assessment (IIA)

An integrated tool to inform effective decision making

This **Integrated Impact Assessment tool** incorporates the principles of the Well-being of Future Generations (Wales) Act 2015 and the Sustainable Development Principles, the Equality Act 2010 and the Welsh Language Measure 2011 (Welsh Language Standards requirements) and Risk Management in order to inform effective decision making and ensuring compliance with respective legislation.

1. PROPOSAL DETAILS: (Policy/Change Objective/Budget saving)	
Proposal Title	Housing Grants and Loans Financial Assistance Policy

Service Area	Housing	Corporate Lead Officer	Donna Pritchard	Strategic Director	Caroline Lewis

Name of Officer completing the IIA	Alwen Edwards	E-mail	Alwen.Edwards@ceredigion.gov.uk	Phone no	01545 572183

Please give a brief description of the purpose of the proposal
This Policy includes the details for the Grants and Loans delivered by the Housing Service. These include external and internal funded grant and loans assistance and the conditions that apply to each. We are seeking to update the policy to include additional details on the loans and in line with the Welsh Government requirement to remove the Test of Financial Resources for small and medium sized grants. By removing the Test of Financial Resources this may have an impact on the number of clients eligible for the grant.
Who will be directly affected by this proposal? (e.g. The general public, specific sections of the public such as youth groups, carers, road users, people using country parks, people on benefits, staff members or those who fall under the protected characteristics groups as defined by the Equality Act and for whom the authority must have due regard).
This will directly affect the general public who require disabled adaptations in order for them to remain living independently in their own homes.

VERSION CONTROL: The IIA should be used at the earliest stages of decision making, and then honed and refined throughout the decision making process. It is important to keep a record of this process so that we can demonstrate how we have considered and built in sustainable development, Welsh language and equality considerations wherever possible.

Author	Decision making stage	Version number	Date considered	Brief description of any amendments made following consideration
Alwen Edwards	Overview and Scrutiny	1	16/12/2021	*This will demonstrate how we have considered and built in sustainable development throughout the evolution of a proposal. Have you considered and applied the sustainable development principle and Well-being Goals?*

COUNCIL STRATEGIC OBJECTIVES: Which of the Council's Strategic Objectives does the proposal address and how?	
Boosting the Economy	The Policy will have a positive impact on the local construction industry providing job opportunities due to the potential increase in the number of residents eligible for housing adaptations. Contractors from the CCC Minor Works Framework currently deliver housing adaptations and there is a potential for additional adaptations to be approved and undertaken. In addition to this with elderly clients living in their own homes there will be an increase in the reliance on local carers calling several times a day – local employment.
Investing in People's Future	The Policy will provide the opportunity for disabled and elderly residents to remain living within their homes through timely adaptations enabling them to live within their communities and with their families enhancing their health and wellbeing.
Enabling Individual and Family Resilience	By providing disabled adaptations to elderly and disabled clients, this enables clients to remain living independently within their homes and communities and with their families for longer.
Promoting Environmental and Community Resilience	By providing disabled adaptations to elderly and disabled clients, this enables clients to remain living independently within their homes and continue to be a part of their community. In building extensions and undertaking other adaptations within the home, the latest Building Regulations are adhered to ensuring that energy efficiency measures are installed within the structures. Local contractors who are on the CCC Minor Works Framework are used to deliver the works with the use of local Building Merchants reducing travel costs.

NOTE: As you complete this tool you will be asked for **evidence to support your views**. These need to include your baseline position, measures and studies that have informed your thinking and the judgement you are making. It should allow you to identify whether any changes resulting from the implementation of the recommendation will have a positive or negative effect. Data sources include for example:

- *Quantitative data - data that provides numerical information, e.g. population figures, number of users/non-users*
- *Qualitative data – data that furnishes evidence of people's perception/views of the service/policy, e.g. analysis of complaints, outcomes of focus groups, surveys*
- *Local population data from the census figures (such as Ceredigion Welsh language Profile and Ceredigion Demographic Equality data)*
- *National Household survey data*
- *Service User data*
- *Feedback from consultation and engagement campaigns*
- *Recommendations from Scrutiny*

- *Comparisons with similar policies in other authorities*
- *Academic publications, research reports, consultants' reports, and reports on any consultation with e.g. trade unions or the voluntary and community sectors, 'Is Wales Fairer' document.*
- *Welsh Language skills data for Council staff*

2. SUSTAINABLE DEVELOPMENT PRINCIPLES: How has your proposal embedded and prioritised the five sustainable development principles, as outlined in the Well-being of Future Generations (Wales) Act 2015, in its development?			
Sustainable Development Principle	Does the proposal demonstrate you have met this principle? If yes, describe how. If not, explain why.	What evidence do you have to support this view?	What action (s) can you take to mitigate any negative impacts or better contribute to the principle?
Long Term Balancing short term need with long term and planning for the future.	The Policy will be amended on a regular basis depending on changes in law, guidance and local circumstances. The removal of the Test of Financial Resources (TFR) for small and medium size grants will result in an increase of clients eligible for adaptations and these clients will remain living independently in their own homes reducing the need for them to move into hospital/care homes. This will reduce the need to expand the capacity of both establishments.	In the 4 years pre-Covid (i.e. 2016-17 to 2019-20) on average 115 DFG adaptations were delivered annually. Of these, on average 16 clients annually were as a result of hospital discharge. There are no figures available to demonstrate the number of clients who were not eligible due to having a high contribution on the Test of Financial Resources. There are no figures for residents who undertake adaptations without contacting the LA.	N/A

	More properties will be adapted and these adaptations can be used by other family members, or sold to owners who may require the adaptation.	Of the 357 completed and returned Satisfaction Questionnaires (2016-17 to 2019-20), 354 were satisfied or very satisfied with the adaptation. 17% of households on the Ceredigion Housing Register have requested an adapted property, thus creating the Accessible Housing Register	
Collaboration Working together with other partners to deliver.	The LA are working in collaboration with Welsh Government to deliver their requirements of removing the TFR for small and medium sized Adaptations. The Policy has been developed in conjunction with the relevant Partners, i.e. OTs from Social Service and the Health Board, Wales and West Care and Repair Service and local RSLs.	WG have requested this amendment for each authority in Wales. In order to effectively deliver disabled adaptations, Occupational Therapists (OTs) working for Social Services and the Health Board submit recommendations to the Section for elderly/disabled service users in the County. – Annually an average of 178 recommendations have been received based on the figures for the 4	N/A

		years pre-Covid (i.e. 2016-17 to 2019-20) The LA work in collboration with Wales and West Care and Repair Agency to deliver the small sized adaptations and they act as Agents in a number of schemes delivering medium sized adaptations. An OT Liaison meeting is held regularly with the partners, minutes are provided for these meetings. Third Sector Organisations, i.e. Age Concern, CAVO, British Red Cross inform eldery/disabled/vulnerable residents of the availablilty of grant aid for adaptations within the home and act as advocate for them.	
Involvement Involving those with an interest and seeking their views.	The following stakeholders were consulted with in developing the Poilcy: Ceredigion County Council - i) Housing Adaptations Section ii) Housing Strategy and Enabling Service iii) Social Services – OTs;	The Policy has been discussed and views sought through the OT Liaison Meetings. Minutes of these Meetings can be provided	N/A

	Health Board – i) OTs Wales and West Housing Association - i) Care and Repair ii) Housing Team Barcud Housing Association Strategic Housing Partnership Group The views of the stakeholders were sought early in the process especially as the change will impact on each Service, i.e. OTs, C&R, Housing Adaptations. OT LIaison Meetings are held every couple of months with representations from Social Services OTs, Hospital OTs, Care and Repair, Barcud and Wales and West Housing Associations.	Minutes of the Meetings can be provided Minutes of the Meetings can be provided	
Prevention Putting resources into preventing problems occurring or getting worse.	This is a requirement from WG to remove the TFR for small and medium sized adaptation grants. It is envisaged that there will be i) an increase in enquiries received by Social Services OTs, ii) an increase in recommendations coming through to the Housing Adaptations Section; iii) an increased number of schemes for the contractors on the Minor Works	Although it is not recorded or the number collected for those who enquire for a grant and are unsuccessful as their contribution towards the cost of the scheme is greater or equal to the cost of the work, these Service users will be eligible for grant aid once the TFR has been removed for small and medium sized grants.	N/A

	Framework to deliver within a specified timeframe and iv) an increase in the required budget to deliver the schemes. v) All the above timescales feed into our Performance Indicators for the time it takes to deliver a DFG adaptation from time of first contact to completion of the adaptation. The Financial Assistance Policy will address these issue by taking into Account – i) Applying a maximum financial limit to small sized grants; ii) Applying a maximum financial limit to the medium sized grant; iii) Introduce a Priority List system	Those who **believe** that their contribution towards the cost of the works will be too high do not contact SS for an OT visit, therefore once the means test is removed for small and medium sized grants all will be eligible. The actual extent of the increase in the number of enquiries that will be received is unknown at present.	
Integration Positively impacting on people, economy, environment and culture and trying to benefit all three.	This Policy will affect Social Service – OT Section as well as the Housing Adaptations Section. The two sections work closely together and hold OT Liaison Meetings every couple of months addressing problem cases, workloads, financial situation of the grant budget, policies and procedures. The requirement as laid out from WG	The changes to the policy has been developed with partners and we will continue to monitor the delivery of the service through the OT Liaison meetings.	N/A

	was shared with the stakeholders early on. This could positively impact the i) Economy – additional work for local contractors; ii) Environment – keeping service users in their homes will reduce the number of beds required in hospitals/care homes. All adaptations and new builds are done up to Building Control standards, this usually includes for insulation measures.		

3. WELL-BEING GOALS: Does your proposal deliver any of the seven National Well-being Goals for Wales as outlined on the Well-being of Future Generations (Wales) Act 2015? Please explain the impact (positive and negative) you expect, together with suggestions of how to mitigate negative impacts or better contribute to the goal. We need to ensure that the steps we take to meet one of the goals aren't detrimental to meeting another.			
Well-being Goal	Does the proposal contribute to this goal? Describe the positive or negative impacts.	What evidence do you have to support this view?	What action (s) can you take to mitigate any negative impacts or better contribute to the goal?
3.1. A prosperous Wales Efficient use of resources, skilled, educated people, generates wealth, provides jobs.	The Policy positively contributes to a prosperous Wales, through opportunities for local procurement, community involvement, jobs and/or apprenticeships and green enterprise. There is a CCC Minor Works Framework where the contarctors are sourced and with an increased number	Minor Works Framework requirement for local contractors.	N/A

	of schemes being delivered this will increase the opportunity for local tradesmen.		
3.2. A resilient Wales Maintain and enhance biodiversity and ecosystems that support resilience and can adapt to change (e.g. climate change).	All works undertaken are to the requirements as set by Building Control, this includes insulation measures, specially for new builds. Service users can remain within their homes and within their communities, strengthening the communities. By ensuring that service users can remain living independently within their homes without the need to be admitted into hospitals or care homes, this will reduce the amount of additional pressure on the capacity of both limiting the number/size of new homes/hospitals having to be built to accommodate them.	Requirements of Building Control Regulations.	N/A
3.3. A healthier Wales People's physical and mental wellbeing is maximised and health impacts are understood.	Service users physical and mental wellbeing is maximised by providing the adaptation to those that previously would not have been eligible and ensuring that they can live independently within their homes and communities surrounded by family and friends. Along with the impact to the Housing Adaptation Service, the Social Services OT section and Wales and West Care and Repair Service will have an increase workload if a greater number	Of the 357 completed and returned Satisfaction Questionnaires received following a disabled adaptation within their home, 354 were satisfied or very satisfied with the adaptation. (Figures based on 4 years pre-Covid i.e. 2016-17 to 2019-20).	N/A

	of residents within the county are eligible for grant aid for adaptations. The living environment of the service user will be improved and by keeping their independence and remaining to live within their home, among their family and friends, this will improve the person's quality of life.		
3.4. A Wales of cohesive communities Communities are attractive, viable, safe and well connected.	The Policy will have a positive impact on service users, as they will be able to remain living within their communities instead of being admitted to hospital/care home and live among their family and friends within the sfatey of their own home following the adaptation.	Enabling local people to remain living in their communities, will contribute towards sustaining cultural heritage and language.	N/A
3.5. A globally responsible Wales Taking account of impact on global well-being when considering local social, economic and environmental well-being.	There is a positive impact for a globally responsible Wales through ensuring that residents remain living independently within their own homes without the need to move into a Care Home or be admitted to hospital reducing the number of spaces required in both. Building works undertaken will be to Building Regulations requirements reducing people's carbon footprint.	Requirements of Building Control Regulations.	N/A

<table>
<tr>
<td>3.6. A more equal Wales
People can fulfil their potential no matter what their background or circumstances.

In this section you need to consider the impact on equality groups, the evidence and any action you are taking for improvement.
You need to consider how might the proposal impact on equality protected groups in accordance with the Equality Act 2010?
These include the protected characteristics of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or beliefs, gender, sexual orientation.
Please also consider the following guide::
Equality Human Rights - Assessing Impact & Equality Duty</td>
<td>Describe why it will have a positive/negative or negligible impact.

Using your evidence consider the impact for each of the protected groups. You will need to consider do these groups have equal access to the service, or do they need to receive the service in a different way from other people because of their protected characteristics. It is not acceptable to state simply that a proposal will universally benefit/disadvantage everyone. You should demonstrate that you have considered all the available evidence and address any gaps or disparities revealed.</td>
<td>What evidence do you have to support this view?

Gathering Equality data and evidence is vital for an IIA. You should consider who uses or is likely to use the service. Failure to use data or engage where change is planned can leave decisions open to legal challenge. Please link to involvement box within this template. Please also consider the general guidance.</td>
<td>What action (s) can you take to mitigate any negative impacts or better contribute to positive impacts?

These actions can include a range of positive actions which allows the organisation to treat individuals according to their needs, even when that might mean treating some more favourably than others, in order for them to have a good outcome. You may also have actions to identify any gaps in data or an action to engage with those who will/likely to be effected by the proposal. These actions need to link to Section 4 of this template.</td>
</tr>
<tr>
<td>Age
Do you think this proposal will have a positive or a negative impact on people because of their age? (Please tick ✓)
<table>
<tr><td>Children and Young People up to 18</td><td>Positive</td><td>Negative</td><td>None/ Negligible</td></tr>
<tr><td></td><td>✓</td><td></td><td></td></tr>
<tr><td>People 18-50</td><td>Positive</td><td>Negative</td><td>None/ Negligible</td></tr>
<tr><td></td><td>✓</td><td></td><td></td></tr>
<tr><td>Older People 50+</td><td>Positive</td><td>Negative</td><td>None/ Negligible</td></tr>
<tr><td></td><td>✓</td><td></td><td></td></tr>
</table>
</td>
<td>Currently children under 18 year are eligible for a Disbaled facilities grant and is not subject to the Test of Financial Resources – therefore no change.

Test of Financial Resources apply to all clients 18 and over. If the client is on a means tested benefit or on a low income they would qualify for a disabled facility grant with either no contribution having to be paid or a low contribution – therefore no change.</td>
<td>Ceredigion’s population is expected to age over the coming years, with significant increases in the numbers of people aged 65 and over, and more particularly in the 85+ age group. As life expectancy increases, the demand for housing which is suited to the needs of the elderly is likely to increase further.</td>
<td>N/A</td>
</tr>
</table>

				If the client is working/has a pension or substantial savings which is in excess of the income/savings thresholds as prescribed for a disabled facilties grant, their contribution could be high. Their contribution could be greater than the cost of the adaptation or they would be unable to fund the contribution and would not be able to receive the adaptation – if the Test of Financial Resources would be removed for small and medium sized grants, all client would be eligible to small and medium sized disabled facility grant and receive the adaptations that are required in their home. Larger grant would still be subject to a Test of Financial Resources.		

<table>
<tr><td colspan="4">Disability
Do you think this proposal will have a positive or a negative impact on people because of their disability? (Please tick ✓)</td><td rowspan="4">Currently children under 18 and adults 18 and over who are on a means tested benefit or on a low income will be eligible for a disabled faciltiies grant.</td><td rowspan="4">All residents will now be eligible for housing adaptations regardless of their financial circumstances.

The 2011 Census identifies 21% of the poplation as having a long term health</td><td rowspan="4">N/A</td></tr>
<tr><td rowspan="2">Hearing Impartment</td><td>Positive</td><td>Negative</td><td>None/ Negligible</td></tr>
<tr><td>✓</td><td></td><td></td></tr>
<tr><td></td><td>Positive</td><td>Negative</td><td>None/</td></tr>
</table>

Physical Impairment			Negligible	Following the removal of the Test of Financial Resources all clients will be eligible to receive small and medium sized disabled faciltiies grants regardless of their income/pensions and savings.	problem or disability which limits their day to day activities.	
	✓					
Visual Impairment	Positive	Negative	None/ Negligible			
	✓					
Learning Disability	Positive	Negative	None/ Negligible			
	✓					
Long Standing Illness	Positive	Negative	None/ Negligible			
	✓					
Mental Health	Positive	Negative	None/ Negligible			
	✓					
Other	Positive	Negative	None/ Negligible			

Transgender Do you think this proposal will have a positive or a negative impact on transgender people? (Please tick ✓)				The Policy aims to suit all individual needs, there will be no differential impact on transgender persons. Individual needs are identified through the application and recommendations received from OTs and these are addressed accordingly.	Figures on gender reassignment are difficult to establish since most people experiencing gender dysmorphia are likely to wish to remain undetected. A report from the Home Office suggests that Organisations should consider that 1% of their employees and service users may experience some degree of gender variance.	Council Staff will be provided training on the Codes and Practices of the Equality Act 2010.
Transgender	Positive	Negative	None/ Negligible			
	✓					

Marriage or Civil Partnership			

Do you think this proposal will have a positive or a negative impact on marriage or Civil partnership? (Please tick ✓)				The Policy aims to suit all individual needs, there will be no differential impact based on marital status.	According to 2011 Census Reports, the proportion of married people is at 42.8%, which is almost four percentage points lower than in England. The proportion of a same-sex civil partnership is at 0.2%, which compares fairly with England.	Council Staff will be provided training on the Codes and Practices of the Equality Act 2010.
Marriage	Positive	Negative	None/ Negligible			
	✓					
Civil partnership	Positive	Negative	None/ Negligible			
	✓					

Pregnancy or Maternity Do you think this proposal will have a positive or a negative impact on pregnancy or maternity? (Please tick ✓)				The Policy aims to suit all individual needs, there will be no differential impact based on whether the applicant is pregnant or on maternity leave. The changes to the Test of Financial Resources requirement would not impact on clients who are pregnant or on maternity who can apply for disabled faciltiies grants.		Council Staff will be provided training on the Codes and Practices of the Equality Act 2010.
Pregnancy	Positive	Negative	None/ Negligible			
	✓					
Maternity	Positive	Negative	None/ Negligible			
	✓					

Race Do you think this proposal will have a positive or a negative impact on race? (Please tick ✓)				Customs, beliefs and traditions within diverse communities will be respected. Citizens who have migrated into the area, where another language is their primary language, and where they have limited or no	From the Census returns, 2,196 of the citizens of Ceredigion reported that their main language was other than Welsh or English. The largest group of main language speakers after English and Welsh was Polich with 663 individuals. Ceredigion is also offering support to the Syrian	The use of WITS interpretation service might be required for service users who are migrants and have limited or no Welsh/English language skills.
White	Positive	Negative	None/ Negligible			
	✓					
Mixed/Multiple Ethnic Groups	Positive	Negative	None/ Negligible			
	✓					

Asian / Asian British	Positive	Negative	None/ Negligible	Welsh/English language skills, may require a translation service.	Refugee Project, where there could be a number of speakers who do not have neither English or Welsh language skills.	
	✓					
Black / African / Caribbean / Black British	Positive	Negative	None/ Negligible			
	✓					
Other Ethnic Groups	Positive	Negative	None/ Negligible			
	✓					

Religion or non-beliefs Do you think this proposal will have a positive or a negative impact on people with different religions, beliefs or non-beliefs? (Please tick ✓)				Customs, beliefs and traditions within diverse communities will be respected.	The majority of the population of Wales describe themselves in the 2011 Census as Christian i.e. 59%. In Wales, 31% sais they have no religion and 9% declined to answer. Muslims are the next largerst group in Wales with 521 members representing 0.7% of the population, followed by Buddhists (0.5%).	Council Staff will be provided training on the Codes and Practices of the Equality Act 2010.
Christian	Positive	Negative	None/ Negligible			
	✓					
Buddhist	Positive	Negative	None/ Negligible			
	✓					
Hindu	Positive	Negative	None/ Negligible			
	✓					
Humanist	Positive	Negative	None/ Negligible			
	✓					
Jewish	Positive	Negative	None/ Negligible			
	✓					
Muslim	Positive	Negative	None/ Negligible			
	✓					
Sikh	Positive	Negative	None/ Negligible			

	✓					
Non-belief	Positive	Negative	None/ Negligible			
	✓					
Other	Positive	Negative	None/ Negligible			
	✓					

Sex Do you think this proposal will have a positive or a negative impact on men and/or women? (Please tick ✓)				The Policy aims to suit all individual needs, there will be no differential impact based on sex of the applicant.	According to the 2011 Census the proportion of males and females are fairly equal in Ceredigion.	N/A
Men	Positive	Negative	None/ Negligible			
	✓					
Women	Positive	Negative	None/ Negligible			
	✓					

Sexual Orientation Do you think this proposal will have a positive or a negative impact on people with different sexual orientation? (Please tick ✓)				The Policy aims to suit all individual needs, there will be no differential impact based on sexual orientation.	Information on secual orientation is not gathered by the Census. Almost 170,000 people responded to the question on sexual identity in the ONS Integrated Household Survey 2013. In Wales, 93.5% were heterosexual, 1.4% gay, lesbian or bisexual, 0.4% other and answere 'don't know' or decline to respond. A further 1.8% provided no response at all. The ONS are using the estimate of 5-7% of	N/A
Bisexual	Positive	Negative	None/ Negligible			
	✓					
Gay Men	Positive	Negative	None/ Negligible			
	✓					
Gay Women / Lesbian	Positive	Negative	None/ Negligible			
	✓					
Heterosexual / Straight	Positive	Negative	None/ Negligible			

	✓				the population who are lesian, gay or bisexual, these figures are also accepted by Stonewall. (Stonewall is a lesbian, gay, bisexual and transgender (LGBT) rights charity in the United Kingdom).	

Having due regards in relation to the three aims of the Equality Duty - determine whether the proposal will assist or inhibit your ability to eliminate discrimination; advance equality and foster good relations.
3.6.2. How could/does the proposal help advance/promote equality of opportunity? *You should consider whether the proposal will help you to: ● Remove or minimise disadvantage ● To meet the needs of people with certain characteristics ● Encourage increased participation of people with particular characteristics*
The Policy will help promote equality of opportunity for all residents to be obtain an adaptation to enable them to remain living within their own homes.
3.6.3. How could/does the proposal/decision help to eliminate unlawful discrimination, harassment, or victimisation? *You should consider whether there is evidence to indicate that: ● The proposal may result in less favourable treatment for people with certain characteristics ● The proposal may give rise to indirect discrimination ● The proposal is more likely to assist or imped you in making reasonable adjustments*
The Policy helps to eliminate discrimination by being accessible to all groups, and by making reasonable adjustments whenever required.
3.6.4. How could/does the proposal impact on advancing/promoting good relations and wider community cohesion? *You should consider whether the proposal with help you to: ● Tackle prejudice ● Promote understanding*
No group is shown favour and the policy encourages inclusivity. We aim to provide adaptations to all those in nees taking into account their language needs, age, disability, gender assignment, Marriage or Civil Partnership, Pregnancy or Maternity, Tace, Religion or Non-belief, Sex, Sexual Orientation, and to encourage and support community cohesion within diverse communities.

Having due regard of the Socio-Economic Duty of the Equality Act 2010. **Socio-Economic Disadvantage is living in less favourable social and economic circumstances than others in the same society.** *As a listed public body, Ceredigion County Council is required to have due regard to the Socio-Economic Duty of the Equality Act 2010. Effectively this means carrying out a poverty impact assessment. The duty covers all people who suffer socio-economic disadvantage, including people with protected characteristics*.

3.6.5 What evidence do you have about socio-economic disadvantage and inequalities of outcome in relation to the proposal? Describe why it will have a positive/negative or negligible impact.
The outcome of this Policy will have a positive impact on the socio-economic disadvantage and inequalities as the policy is inclusive.
What evidence do you have to support this view?
The Policy improves the health and wellbeing of residents by providing Adaptations and improving their living conditions.
What action(s) can you take to mitigate any negative impacts or better contribute to positive impacts?
N/A

3.7. A Wales of vibrant culture and thriving Welsh language Culture, heritage and Welsh Language are promoted and protected. *In this section you need to consider the impact, the evidence and any action you are taking for improvement. This in order to ensure that the opportunities for people who choose to live their lives and access services through the medium of Welsh are not inferior to what is afforded to those choosing to do so in English, in accordance with the requirement of the Welsh Language Measure 2011.*				Describe why it will have a positive/negative or negligible impact.	What evidence do you have to support this view?	What action (s) can you take to mitigate any negative impacts or better contribute to positive impacts?
Will the proposal be delivered bilingually (Welsh & English)?	Positive ✓	Negative	None/ Negligible	The Policy will be available in both Welsh and English	Bilingual copies of the final Policy will be availbale on the corporate website in accordance with full compliance with the Council Welsh Language Standards.	N/A
Will the proposal have an effect on opportunities for persons to use the Welsh language?	Positive ✓	Negative	None/ Negligible	The impact of the Policy is positive. Communities are changing in Ceredigion, and this is having an effect on language use. The Policy will enable local residents to remain living within their own homes and within their communities for longer through the installation of adaptations.	Ceredigion Welsh Language Profile, 47% (approx. 35,000) of the population over 3 years old are welsh speakers according to Census 2011 returns. We recoed applicants language of choice on applications.	N/A
Will the proposal increase or reduce the opportunity for persons to access services through the medium of Welsh?	Positive ✓	Negative	None/ Negligible	The impact of the Policy is positive. Service users may access the service in	Applicants can apply in either Welsh or English and receive a full service in their language of choice.	N/A

				Welsh or English in accordance with the Council's language policy.		
How will the proposal treat the Welsh language no less favourably than the English language?	Positive ✓	Negative	None/ Negligible	The Policy and relevant documents will be available in both languages. We are always mindful of language and culture and seek to provide adaptations to fomes for local people to have the opportunity to remain living independently within their own homes and within their communities in order for the language to thrive.	The Policy and relevant documentation are available through the medium of Welsh and English.	N/A
Will it preserve promote and enhance local culture and heritage?	Positive ✓	Negative	None/ Negligible	The Policy will aim to have a positive effect on local culture and heritage as it aims to keep elderly and disabled residents living within their homes and communities.	Actions will address the needs of local residents which includes language needs and protecting cultural heritage of the county.	N/A

4. STRENGTHENING THE PROPOSAL: If the proposal is likely to have a negative impact on any of the above (including any of the protected characteristics), what practical changes/actions could help reduce or remove any negative impacts as identified in sections 2 and 3?

4.1 Actions.

What are you going to do?	When are you going to do it?	Who is responsible?	Progress
To ensure that all staff members are aware of and adequately trained in Equality Act and Welsh Language Measures.	Ongoing	Senior Housing Adaptations and Energy Efficiency Officer	
The use of WITS interpretation service might be required for serive users who are migrants and have limited or no Welsh/English language skills.	Ongoing	Senior Housing Adaptations and Energy Efficiency Officer	

4.2. If no action is to be taken to remove or mitigate negative impacts please justify why.
(Please remember that if you have identified unlawful discrimination, immediate and potential, as a result of this proposal, the proposal must be changed or revised).

See above

4.3. Monitoring, evaluating and reviewing.
How will you monitor the impact and effectiveness of the proposal?

The impact and effectiveness of the delivery of the Policy will be monitored through regular Team Meetings, OT Liaison Meetings and Finance meetings.

5. RISK: What is the risk associated with this proposal?

Impact Criteria	1 - Very low	2 - Low	3 - Medium	4 - High	5 - Very High
Likelihood Criteria	1 - Unlikely to occur	2 - Lower than average chance of occurrence	3 - Even chance of occurrence	4 - Higher than average chance of occurrence	5 - Expected to occur

Risk Description	Impact (severity)	Probability (deliverability)	Risk Score
Increase in the number of enquiries and adaptations	3 Medium	3 Even chance of occurance	3 x 3 = 9
Insufficient budget for delivery of all adaptations	3 Medium	4 Higher than average chance of occurance	3 x 4 = 12
Does your proposal have a potential impact on another Service area?			
This policy has a potential impact on the OT service both within the Council and Hospital setting.			

6. SIGN OFF			
Position	Name	Signature	Date
Service Manager			
Corporate Lead Officer			
Strategic Director			
Portfolio Holder			