Integrated Impact Assessment (IIA) Report

This form should be completed when a screening form has indicated a full Integrated Impact Assessment is required and found to be relevant to Equality Act 2010, Socio-economic Duty and Well-being of Future Generations (Wales) Act 2015

Please refer to the 'IIA Report Form Guidance' while completing this form. If you need further support, please contact accesstoservices@swansea.gov.uk.

	hich service area and directorate are you from? ervice Area: Housing and Public Health – Housing Renewals and Adaptations Directorate: Place			
Q1(a)	What are you assessing?			
	New and revised policies, practices or procedures			
=	Service review, re-organisation or service changes/reductions, which affect the wider community, service us	sers and/or staff		
	Efficiency or saving proposals			
	Setting budget allocations for new financial year and strategic financial planning			
	New project proposals affecting staff, communities or accessibility to the built environment, e.g., new constr	uction work or adaptations to existing buildings, moving		
	to on-line services, changing location			
	Large Scale Public Events			
	Local implementation of National Strategy/Plans/Legislation			
	Strategic directive and intent, including those developed at Regional Partnership Boards and Public Service			
\boxtimes	Medium to long term plans (for example, corporate plans, development plans, service delivery and improve	ment plans)		
	Setting objectives (for example, well-being objectives, equality objectives, Welsh language strategy)			
	Major procurement and commissioning decisions			
	Decisions that affect the ability (including external partners) to offer Welsh language opportunities and servi	ces		

(b) Please name and fully <u>describe</u> initiative here:

Report to Council on the renewal of the service's Housing Renewal and Disabled Adaptations : Policy to Provide Assistance for 2022-2027.

A policy has to be developed and published by a local authority on how they intend providing housing financial assistance within their area for a set period of time for households requiring housing adaptations and repairs, to comply with legislation set out in the Regulatory Reform (Housing Assistance) (England and Wales) Order 2002.

(c) It was initially screened for relevance on: 8.11.21 Attached for reference

(d) Lead Officer

Name: Darren Williams

Job title: Programme Planning and Delivery Manager – Renewals and Adaptations

Date: 8.11.21

(e) Approved by Head of Service

Name: Mark Wade

Job title: Head of Housing and Public Health

Date: 8.11.21

Section 1 - Aims

What are the aims of the initiative? A policy has to be developed and published by a local authority on how they intend providing housing financial assistance within their area for a set period of time for households requiring housing adaptations and repairs, to comply with legislation set out in the Regulatory Reform (Housing Assistance) (England and Wales) Order 2002.

Who has responsibility? Housing Renewals and Adaptations service - lead Darren Williams.

Who are the stakeholders? Public receiving housing adaptations, repairs or empty property assistance, in particular vulnerable groups including disabled persons, elderly residents and low income households. Other stakeholders include partners assisting the service in delivery of the assistance including Social Services OT service, Western Bay Care and Repair, ADAPT project, Energy Savings Trust, Housing Landlord Services, Corporate Building Services and external contractor appointed to the service's Framework of Contractors.

Section 2 - Information about Service Users (See guidance)

In order to complete this section you will need to look to data such as Census data, research and performance management information, surveys, future trends, service user data, socio-economic data from recent consultations, engagement and research

Children/young people (0-18)	\boxtimes	Sexual orientation	
Older people (50+)	\boxtimes	Gender reassignment	
Any other age group		Welsh language	
Future generations (yet to be born)		Poverty/social exclusion	\geq
Disability	\boxtimes	Carers (including young carers)	
Race (including refugees)		Community cohesion	\geq
Asylum seekers		Marriage & civil partnership	
Gypsies & Travellers		Pregnancy and maternity	
Religion or (non-)belief			
Sex			

Please provide details of the information you hold in relation to the groups above:

- Service user data from applications health and financial, customer satisfaction data.
- Welsh Government data recent adaptation publications including Wales Audit Office Review of Housing Adaptations in Wales 2018, Housing Adaptation Service Standards 2019, Housing Adaptations Strategic Framework 2021, WG Minister for Housing and Local Government announcement of removal of means testing for small and medium Disabled Facilities Grants (DFGs) March 2021, Wales Centre for Public Policy study into the potential impact of the removal of the means test on local authorities in Wales 2021.
- Welsh House Condition Survey Data 2018.
- Swansea .gov.uk/statistics and swansea.gov.uk/profiles

Any actions required, e.g. to fill information gaps (write below and add to action plan)?

None

Section 3 – Assessing the Impact (See guidance)

Please consider the possible impact on the different protected characteristics and statutory considerations:

	Potential Impacts	Positive / Negative/Neutral Impact/Needs further investigation	Prompts (not an exhaustive list) Consider:
Race	No specific impact.	Neutral	Ethnicity Nationality Gypsies / Travellers Language: interpreter provision Refugee / Asylum Seekers Migrants Awareness events United Nations Convention on the Elimination of All Forms of Racial Discrimination (UNCERD)

	Potential Impacts	Positive / Negative/Neutral Impact/Needs further investigation	Prompts (not an exhaustive list) Consider:
Disability	 Removal of DFG on small / medium adaptations will allow some applicants currently not accessing the DFG system to receive assistance. Removal of means test could increase demand for adaptations on the service with future demand outstripping budget, this would lead to waiting lists, backlogs and delays in delivering adaptations. Proposal for a new Discretionary Disabled Facilities loan will provide applicants with an opportunity to use financial assistance to top up the maximum grant level of £36k provided by DFGs where the scheme at planning at preparation stage exceeds this figures. The current policy requires applicants to fund the shortfall, often they do not have these funds due to low income and the scheme cannot proceed. Without this form of assistance more and more schemes would not be undertaken with the ongoing increases in building costs. The increase in the Homefix loan maximum figure due to building cost increases will ensure there is more opportunity to carry out the full range of essential housing repairs at a property. 	Further investigation – a period of monitoring impact will be needed. Positive Positive	Mobility / Dexterity Blind or Visually impaired Deaf or Hearing impaired Mental Health Learning Disabilities Dementia Neurological difference / Autism Access to buildings/ facilities Access to communication methods Dietary requirements Other Long Term Health Conditions United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)

	Potential Impacts	Positive / Negative/Neutral Impact/Needs further investigation	Prompts (not an exhaustive list) Consider:
Carers	The adaptations accessed will assist the carer with the ability to provide the level of care required to a higher standard, safeguarding both the cared for and the carer.	Positive	Providing unpaid and informal care A child caring for a disabled parent An older person caring for a friend who has a mental health issue A young adult caring for a sibling with substance misuse difficulties An adult caring for an older relative who is elderly, frail or experiencing dementia
Sex	No specific impact	Neutral	Men / Women Gender Identity Childcare Gender Pay Gap Domestic abuse United Nations Convention on the Elimination of All Forms of Discrimination against Women (UNCEDAW)

	Potential Impacts	Positive / Negative/Neutral Impact/Needs further investigation	Prompts (not an exhaustive list) Consider:
Age	 Older residents (over 60) are one of the targeted priority client groups for the provision of limited housing assistance, both for adaptations and repairs. Changes to the policy to provide assistance described in disability section will also be applicable here. Child DFG cases are often the most complex cases requiring extensive large adaptations, often exceeding the maximum grant limit of £36k provided by mandatory DFGs. The provision of the Discretionary Disabled Facilities Loan to offer top up funding at preparation stage for families will assist the scheme in being feasible and enable the works to proceed. Assist working age claimants who would not have been able to access financial support for the adaptations because of their income, but however had restricted funds or access to finance to provide such adaptations 	Positive	Older People including citizens with dementia. Could the initiative contribute to the 'age friendly' agenda or improve the experience of getting older in Swansea Children, Young People Cross-generational working offers a wide variety of benefits Working Age People, Young Families Demographics NB: Where children / young people are affected complete the Childrens Rights Checklist United Nations Convention on the Rights of the Child (UNCRC) Caring responsibilities
Future generations (yet to be born)	A number of forms of assistance proposed in the policy are interest free loan based, repayable on future sale or transfer of the property, ensuring these funds are recyclable, providing a sustainable capital funding pot for future generations in need of assistance.	Positive	We must ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs

	Potential Impacts	Positive / Negative/Neutral Impact/Needs further investigation	Prompts (not an exhaustive list) Consider:
Religion & Belief	No specific impact	Neutral	Faith Communities Non Beliefs Dietary requirements Vegetarianism/Veganism Other philosophical beliefs Dress code/uniforms Religious festivals/activities, agile working
Sexual Orientation	No specific impact	Neutral	Gay Lesbian Bi-sexual Heterosexual Terminology Confidentiality about sexuality https://www.stonewall.org.uk/
Gender Reassignment	No specific impact	Neutral	A person who proposes to, starts or has changed their gender identity Transgender Appropriate language use, ie, appropriate pronouns
Marriage & Civil Partnership	No specific impact	Neutral	Marital status Civil Partnership status
Pregnancy & Maternity	No specific impact	Neutral	Pregnant mothers Those entitled to maternity and paternity leave Foster/Adoption Breastfeeding mothers

	Potential Impacts	Positive / Negative/Neutral Impact/Needs further investigation	Prompts (not an exhaustive list) Consider:
Welsh Language	No specific impact	Neutral	Ensuring equal status of both Welsh and English languages. Availability of and access to services, activities and information. Rights of individuals to ask for WL services. Impact on Welsh speaking communities, including: Positive / negative effects on opportunities to use the WL. Possible changes to number/percentage of Welsh speakers Job opportunities / Staffing changes. Training needs and opportunities Availability of Welsh medium education

	Potential Impacts	Positive / Negative/Neutral Impact/Needs further investigation	Prompts (not an exhaustive list) Consider:
Socio Economic Considerations	 DFG & Discretionary DFG (DDFG) grant conditions require repayment of the grant if the property is sold within 10 years of completion (exemptions apply), but the adaptations should ensure the home receives adaptations that enables the applicant to remain living independently and reduce the risk of hospital admissions. These repaid funds will also be recycled for future generations to use. Removal of means test for small / medium adaptations will result in applicants who would have previously been deterred from looking at DFGs now applying, enabling more disabled occupants to receive adaptations. Wales Centre for public policy estimate between 10-20% of applicants drop out of DFG process each year. The potential increase in demand on the removal of the means test for disabled applicants who previously may have had to pay a contribution to part or all of the works. This could add pressures on the service, with the current annual capital budget being sufficient to fund current demand, increased demand could result in backlogs, waiting lists, delays on delivery of the works. 	Possibly negative – further investigation / monitoring will need to take place.	People living in less favourable social and economic circumstances than others in the same society. Disadvantage may be exacerbated by many factors of daily life, not just urban or rural boundaries. The impact on limited incomes are significant but also consideration needs to be given to service accessibility and barriers to participation. 'Intersectionality' issues - where identity compounds socio-economic status, e.g., single parents (often women), disabled people, some BAME groups.
Human Rights	No specific impact	Neutral	See <u>Human Rights Articles</u> .

	Potential Impacts	Positive / Negative/Neutral Impact/Needs further investigation	Prompts (not an exhaustive list) Consider:
Intersectionality	No specific impact	Neutral	The way in which power structures based on factors such as gender, race, sexuality, disability etc. interact with each other and create inequalities, discrimination and oppression. (the multiple layers of discrimination)
Community Cohesion	 Housing repair and empty property loans and grants assist in improving derelict, empty, dilapidated homes, improving the amenity of the area, reducing anti-social behaviour and crime. 	Positive	Think about relationship between people from different backgrounds, community tensions, community facilities http://gov.wales/topics/people-and-communities/communitycohesion/?lang=en
Other (please state)	None		Eg, Modern Slavery, Safeguarding, Other Covid effects, Ex-offenders, Veterans, Care Leavers, Substance Abuse, Homeless

Human Rights Act 1998		•	Article 8	Respect for private life, family, home and correspondence
 Article 2 	Right to life	•	Article 9	Freedom of thought, belief and religion
 Article 3 	Freedom from torture and inhuman or degrading treatment	•	Article 10	Freedom of expression
 Article 4 	Freedom from Slavery and forced labour	•	Article 11	Freedom of Assembly and association
 Article 5 	Right to liberty and security	•	Article 12	Right to marry and start a family
 Article 6 	Right to a fair trial	•	Article 13	Right to access effective remedy if rights are violated
Article 7	No punishment without law	•	Article 14	Protection from discrimination

If you have identified any areas which need further investigation, these will need to be added to your action plan

Section 4 - Involvement

Please consider all of your involvement activities here, e.g. participation, consultation, engagement, co-productive approaches, etc.

What involvement has been undertaken to support your view? How did you ensure this was accessible to all?

- Consultation with partners Western Bay Care and Repair, Social Services OT service.
- Consultation with stakeholders service users via review of customer satisfaction, and contractors.
- Participation in discussions with Welsh Government and South Wales Renewal and Adaptations group on removal of means test proposals for small and medium DFGs and feedback provided.

What did your involvement activities tell you? What feedback have you received?

- Welsh Government Minister for Housing and Local Government has confirmed they intend pressing ahead with removal of means test proposals following feedback from local authorities.
- Customer satisfaction feedback confirms clients are very satisfied with the forms of assistance provided for them, in particular adaptations has improved their quality of life, the adaptations have helped clients to be able to do things in the home they couldn't do before and have helped them to be more confident and independent.
- Western Bay Care and Repair feedback is applicants receiving Minor Adaptations (MAG) and Comfort, Safety Security Grant Handyperson assistance would like to be able to apply for this assistance more often and not have restrictions to how many times they can apply.

How have you changed your initiative as a result?

- The changes to the means test for small and medium DFGs is a directive from Welsh Government and therefore there is limited changes we can make to this proposal, other than determine our own local grant conditions and limits on assistance.
- Western Bay Care and Repair MAG and CSS assistance conditions have been amended to enable applicants to apply for assistance more often, particularly needed with the ongoing demand and increase in building work costs.

Any actions required (e.g. further engagement activities, mitigation to address any adverse impact, etc.)? (Add to action plan)

• Monitoring arrangements being proposed by Welsh Government and locally by the Housing Renewal and Adaptations service to closely monitor the impact of the removal of the means test for small and medium DFGs, in particular the impact on demand for DF assistance.

Section 5 – Duties (please see guidance)

Please consider how the initiative might address the following issues. How will the initiative impact on the duties set out below? Think about what work you have already done to improve the outcomes.

Public Sector Duty - how will th	e initiative address the below?	
Foster good relations between	Continued delivery of housing assistance through our partner organisation ensures an ongoing	
different groups	dialogue and good relationships.	
Elimination of discrimination, harassment and victimisation	The Wales Centre for Public Policy reported in March 2021 that the current means test acts as a deterrent for applying for a DFG, either because the applicant does not want to disclose their financial information or that their income and savings have resulted in them having to apply a contribution to part or all of the works. They estimate between 10-30% of applicants currently drop out of the DFG process as a result.	
Advance equality of opportunity	Welsh Government announced the proposed removal of the means test for small and medium	
between different groups	adaptations due to the perceived inequalities in applicants receiving adaptations dependent on tenure and location, for example social housing tenants not having to financially contribute to adaptations, but owner occupiers and private rented tenants do have to contribute.	
and living in poverty	e any issues identified as a result of the initiative for those people experiencing	
a) Communities of place	 Welsh Government landlord loans assistance will continue to provide funding for landlords to bring empty properties back into use, creating additional affordable accommodation in the city, enabling often vulnerable low income residents on the housing register to find suitable accommodation. 	
b) Communities of interest	 Removal of means test will enable more disabled persons to receive disabled adaptations at no cost to them. Introduction of Discretionary DFG loan will provide a further option for applicants to obtain funding to pay for the shortfall in funding of their scheme where it has been identified as exceeding the mandatory DFG grant maximum of £36k. This loan will not create affordability issues as it will be a lifetime loan, repayable on the future sale or transfer of the property. 	
How does your proposal ensure	that you are working in line with the requirements of the Welsh Language	
	asure (Wales) 2011)? (beyond providing services bilingually)	
a) To ensure the Welsh language is not treated less favourably than the English language	 Assistance available will not have a detrimental impact on Welsh Language and will not be treated less favourably. Documentation / online information available in Welsh. 	
 b) That every opportunity is taken to promote the Welsh language 	As above	
c) Increase opportunities to use and learn the language in the community	As above	

United Nations Convention on the Rights of the Child (UNCRC): Many initiatives have an indirect impact on children and you need to consider whether the impact is positive or negative in relation to both children's rights and their best interests

Will the initiative have any impact (direct or indirect) on children and young people (think about this age group holistically e.g. disabled children, those living in poverty or from BME communities)?

Disabled child DFG applications will continue to be administered in line with legislation where the family is not means tested, therefore no impact.

All initiatives must be designed / planned in the best interests of children and young people.

Best interests of the child (Article 3): The best interests of children must be the primary concern in making decisions that may affect them. All adults should do what is best for children. When adults make decisions, they should think about how their decisions will affect children. This particularly applies to budget, policy and law makers.

Please explain how you meet this requirement:

See Above.

A disabled child with a DFG application receives an OT assessment to determine the adaptations that are necessary and appropriate for them in the home, acting on the best interests of the child.

Section 6 - Sustainable Development

The Well-being of Future Generations Act (Wales) 2015 places a well-being duty on Swansea Council to carry out sustainable development. This is in line with the Council's Sustainable Development Policy and our Corporate Plan's Well-being Objectives. We must work in a way that improves the economic, social, environmental and cultural well-being of Wales, by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals.

The sustainable development principle means we must act in a manner, which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. We do this by applying the five ways of working.

6a) The Sustainable Development Principle's Ways of Working

The Five Ways of Working	Examples or summary of how applied				
Long term - The importance of balancing short-term needs while safeguarding the ability to also meet long-term needs Prevention - Acting to prevent problems occurring or getting worse	With the removal of the means test for small and medium DFGs there is a risk of demand increasing in the medium to long term, outstripping the capital budget available annually, creating a backlog, possible waiting list and delaying delivery of much needed adaptations for disabled persons. Welsh Government and the service locally intend keeping a close eye on the impact on demand. If demand increases to be unsustainable, measures may need to be considered and introduced to mitigate this problem. The forms of assistance provided within the policy to carry out adaptations and essential repairs are intended to be preventative to avoid problems escalating and risking the ability of individuals being able to continue to remain living independently at home, and creating health and social care pressures as a result. The provision of assistance to bring empty properties back into use is a proactive way of dealing with problematic dilapidated homes having a negative impact on the community whilst creating affordable homes for low income households in need of accommodation.				
Integration -Considering impacts upon each of the well-being goals, well-being objectives, local well-being objectives, or on the objectives of other public bodies	 Adaptations assistance links to Welsh Government adaptations and independent living agenda. Policy to provide assistance links with overall housing service priority of investing to improve housing, increasing the supply of good quality affordable homes, and to ensure the housing and support needs of the most vulnerable are met. Policy to provide assistance targeting assistance at the elderly, disabled and low income households links with Council overall objectives of Safeguarding People from Harm and Tackling Poverty. Provision of forms of assistance reduces pressures on housing and social care services. 				

Collaboration - Acting together with other services or external organisation towards our well-being objectives	 Work in collaboration with our delivery partners to deliver the various forms of assistance including Western Bay Care and Repair, Social Services Occupational Therapists service, CBS and external framework contractors.
Involvement - Involving people with an interest in achieving the well-being goals (everybody), and ensuring that those people reflect the diversity of the area served	 Service user consultation – satisfaction feedback. WG adaptations and independent policy direction provided by WG Adaptations steering group made up of representatives from WG, service users, OTs, health and social care, disabled charities, RSLs, Councils, WLGA.

6b) Contribution to Swansea Council's Well-being Objectives

Our Corporate Plan's Well-being objectives	Are directly supported by this initiative	Are not directly impacted by this initiative	May be in conflict or adversely impacted by this initiative
Safeguarding People from harm			
Improving Education and Skills			
Tackling Poverty			
Transforming our economy and infrastructure			
Maintaining and enhancing Swansea's natural resources and biodiversity			
Transformation and Future Council development			

6c) Thinking about your answers above, does the initiative support our Corporate Plan's Well-being Objectives when considered together? Yes

Please consider the positives and negatives as a whole. This is an opportunity to analyse the global impact of the proposal where some objectives will be advanced whilst others may be impacted. Where there is a residual negative impact for one or more

objectives please show that we have considered mitigation to ensure that negative impacts are lessened. Please detail any conflicts gaps and mitigation measures.

Positives:

- Removal of means test for small & medium DFGs will assist those previously deterred from applying for DFG adaptations.
- Providing Discretionary DFG loans to assist applicants if they need it to fund any shortfall in scheme costs at approval stage will ensure disabled applicants receive the adaptations they need.
- Increasing the maximum levels of assistance on some assistance, eg Homefix will ensure there is sufficient funding to carry out essential repairs following recent building cost increases.

Negatives:

• Removal of means test for small and medium adaptations could increase demand, creating potential funding problems in the future, close monitoring will be needed following introduction of policy to assess impact and any mitigating measures that may be needed.

6d) How is contribution to the National Well-being Goals maximised? Where can you add value? Consider the full goal description not just the title. Consider relevant Journey Checkers. Complete the table below

Well-being Goal (click to view definition)	Primary Goals - tick if key	Any significant positive and/or negative impacts/contributions considered/mitigated
A Prosperous Wales: An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work		 Local supply chain and delivery through local framework of contractors and Corporate Building Services. Working with local partner agencies to assist in delivery of assistance, eg Western Bay Care and Repair.

A Resilient Wales: A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).	 Repair loans works includes energy efficiency measures eg solid wall insulation and boiler replacements. Work in partnership with Energy Savings Trust and signpost their services to applicants.
A Healthier Wales A society in which people's physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.	Supporting people through adaptations and essential repairs to their homes to assist them to remain living independently, reduce hospital admissions and facilitate hospital discharges.
A More Equal Wales A society that enables people to fulfil their potential no matter what their background or circumstances.	Providing assistance to bring empty properties back into use, creating additional affordable accommodation for those in housing need.
A Wales of Cohesive Communities Attractive, viable, safe and well-connected communities.	 Providing assistance to bring empty properties back into use, creating additional affordable accommodation for those in housing need, removing problematic properties to improve communities and reduce anti-social behaviour. Undertaking adaptations and essential repairs to make homes safe and enable residents to remain living independently within their own homes and locality, supported by local family / friends networks.
A Wales of Vibrant Culture & Thriving Welsh Language A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, sports and recreation.	The bilingual process enables welsh speakers to stay in their communities and participate in local cultural opportunities.
A Globally Responsible Wales A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.	 Local supply chains that are fair and sustainable. Signposting energy efficiency assistance.

Section 7 - Cumulative Impact/Mitigation

What is the cumulative impact of this proposal on people and/or communities when considering all the impacts identified within the IIA and any other key decisions affecting similar groups/ service users made by the organisation?

(You may need to discuss this with your Service Head or Cabinet Member to consider more widely if this proposal will affect certain groups/ communities more adversely because of other decisions the organisation is making/have made.

For example, financial impact/poverty, withdrawal of multiple services and whether this is disadvantaging the same groups, e.g., disabled people, older people, single parents (who are mainly women), etc.)

Any mitigation needed:

It is important that you record the mitigating actions you will take in developing your final initiative.

Record here what measures or changes you will introduce to the initiative in the final draft, which could:

- reduce or remove any unlawful or negative impact/ disadvantage
- improve equality of opportunity/introduce positive change
- support the Well-being of Future Generations Act (Wales) 2015
- reduce inequalities of outcome resulting from socio-economic disadvantage

Unlawful or Negative Impact Identified	Mitigation / Positive Actions Taken in the initiative (add to action plan)		
Removal of means test on small/medium adaptations could result in an increased demand for DFGs	Both Welsh Government and the Housing Renewal and Adaptations service to monitor closely the impact of this change on demand in Wales and if demand does become unsustainable		

Section 8 – Monitoring arrangements: The IIA process is an ongoing one that does not end when the initiative is agreed and implemented. Please outline the monitoring arrangements and/or any additional data collection that will help you monitor any equality impacts, risks, sustainability of your initiative once implemented:

Monitoring arrangements:

- Service user data.
- · Performance indicator and data returns results.
- · Budget monitoring.
- Ongoing engagement with Welsh Government Independent living team and South Wales Renewal and Adaptations group on impact
 of means test changes. (includes WG officer representation)
- Ongoing engagement with local partners eg Western Bay Care and Repair.

Actions (add to action plan):

- Complete annual WG independent living annual adaptations data returns.
- Service user questionnaires results -reported quarterly.
- Monitor service user complaints for themes.
- Quarterly PAM PI returns.
- · Monthly budget monitoring reports and meetings.
- Attendance on various steering groups including South Wales Renewal and Adaptations group meetings engagement.
- Ongoing membership of Western Bay Care and Repair Board quarterly board meetings engagement.

Section 9 – Outcomes:

Having completed sections 1-8, please indicate which of the outcomes listed below applies to your initiative (refer to the guidance for further information on this section).

Outcome 1: Continue the initiative – no concern	
Outcome 2: Adjust the initiative – low level of concern	
Outcome 3:Justify the initiative – moderate level of concern	
Outcome 4: Stop and refer the initiative – high level of concern.	

For outcome 3, please provide the justification below:

For outcome 4, detail the next steps / areas of concern below and refer to your Head of Service / Director for further advice:

Section 10 - Publication arrangements:

On completion, please follow this 3-step procedure:

- 1. Send this IIA report and action plan to the Access to Services Team for feedback and approval accesstoservices@swansea.gov.uk
- 2. Make any necessary amendments/additions.
- 3. Provide the final version of this report to the team for publication, including email approval of the IIA from your Head of Service. The IIA will be published on the Council's website this is a legal requirement.

Action Plan: Please outline below any actions identified throughout the assessment or any additional data collection that will help you monitor your initiative once it is implemented:

Action	Dates	Timeframe	Lead responsibility	Progress	Add to Service Plan
Close monitoring of DFG demand	End of each quarter	Commence in 2022-23	Darren Williams		
WG proposal for close monitoring of DFG demand on LAs in Wales following the introduction of the removal of the means test.	Not known.	To start 22-23	Welsh Government – Dan Jones, Head of Health and Housing		
Complete annual WG independent living annual adaptations data returns including analysing data.	May each year	Annual	Darren Williams		
Monitor customer complaints for themes developing.	Quarterly	Ongoing	Darren Williams		
PI / data monitoring / budget reports and meetings including analysing data.	Quarterly	Ongoing	Darren Williams		
Attendance on South Wales Renewals and Adaptations Group and other groups eg WG loans group, to discuss matters arising from	Quarterly	Ongoing	Darren Williams		

changes to the means test for DFGs and other adaptation / repair / empty property matters, including discussions with WG officers attending to discuss emerging themes and actions needed to address them.				
Engagement with partners to identify and issues occurring that needs actions to mitigate eg engagement with Western Bay Care and Repair.	Quarterly	Ongoing	Darren Williams	

^{*} Please remember to be 'SMART' when completing your action plan (Specific, Measurable, Attainable, Relevant, Timely).