

Integrated Impact Assessment Form

Promoting Equality, Human Rights and Sustainability

Title of Policy/ Proposal	Housing Allocation Policy
Completion Date	November 2019
Completed by	Stephen Clark
Lead officer	Stephen Clark

Type of Initiative:

Policy/Strategy

Programme/Plan	New or Proposed
Project	Changing/Updated
Service	<u>Review or existing</u>
Function	Other

Statement of Intent

1. Briefly describe the policy/proposal you are assessing.

Set out a clear understanding of the purpose of the policy being developed or reviewed (e.g. objectives, aims) including the context within which it will operate.

Midlothian's Housing Allocation Policy sets out the policy which determines how all Midlothian Council's housing stock is let to housing applicants.

There are three key pieces of legislation which Registered Social Landlords must comply with when operating a Housing Allocation Policy, the Housing (Scotland) Acts of 1987, 2001 and 2014. The Housing (Scotland) Act 2014 requires that social landlords give reasonable preference to:

- People who are homeless or are threatened with homelessness and who have unmet housing needs;
- People who live in unsatisfactory housing conditions and who have unmet housing needs; and
- Social housing tenants who are considered to be under-occupying their home.

What will change as a result of this policy?

The Housing Allocation Policy needs to reflect Scottish Government guidance and the Housing (Scotland) Act 2014 as well as making best use of the housing stock that is available.

2. Do I need to undertake a Combined Impact Assessment?

High Relevance	Yes/no
The policy/ proposal has consequences for or affects people	Yes
The policy/proposal has potential to make a significant impact on equality	Yes
The policy/ proposal has the potential to make a significant impact on the economy and the delivery of economic outcomes	No
The policy/proposal is likely to have a significant environmental impact	No
Low Relevance	

The policy/proposal has little relevance to equality	No
The policy/proposal has negligible impact on the economy	Yes
The policy/proposal has no/ minimal impact on the environment	Yes
<p>If you have identified low relevance please give a brief description of your reasoning here and send it to your Head of Service to record.</p> <p>N/A</p> <p>If you have answered yes to high relevance above, please proceed to complete the Integrated Impact Assessment.</p> <p>Completed</p>	

3. What information/data/ consultation have you used to inform the policy to date?

Evidence	Comments: what does the evidence tell you?
Data on populations in need	- The need for social rented housing in Midlothian continues to grow with over 4,500 applicants on the Housing List.
Data on service uptake/access	- A range of data is published on lettings analysis and equalities groups.
Data on quality/outcomes	- Regular Tenant Satisfaction Surveys are conducted and published and Reports on Data Indicators are published.
Research/literature evidence	- Periodic Housing Need and Demand Assessments are undertaken for Midlothian and the SESplan Area.
Service user experience information	- Consultation Report published. - Midlothian Tenant Panel involved in consultation process.
Consultation and involvement findings	In early 2019, officers considered the appropriate methods to undertake consultation on the Housing Allocation Policy Review. Following a review of good practice, the following methods were agreed:

	<ul style="list-style-type: none"> - Development of an easy to read and attractive newsletter which provided information on the current Housing Allocation Policy and details of some possible changes that could be implemented. This was sent to all council tenants and applicants on Midlothian Council's Housing List. - Development of a survey which sought the views of tenants and housing applicants on possible changes to the Policy. - Three consultation drop-in events across Midlothian during March and April 2019. - Consulting with members of the Midlothian Tenant Panel, tenant and resident groups and other relevant stakeholders. - Providing tenants and housing applicants with a range of ways of providing feedback, including face to face, telephone, online, text messaging and by post. - A full Report of the Consultation Findings was provided to Elected Members in order that they better understand the views of tenants and applicants. This Report will also be published online and summarised via the Tenant Newsletter. <p>Most of suggested options for amendments were strongly supported by the majority of respondents. There were two proposals which received less than 50% support from respondents:</p> <p>Tenants and Housing List Applicants were asked their views about removing the target to let to Choice Group applicants and move applicants onto the General Needs List. 39% of applicants disagreed with this, 34% stated "don't know" and 27% were in agreement.</p> <p>When asked about moving to a Choice-Based Letting model, 36% of respondents supported this, 32% disagreed and 32% stated "don't know."</p>
--	--

Good practice guidelines	- Scottish Government Code of Practice sets out key features of the Allocation Policy.
Other (please specify)	N/A
Is any further information required? How will you gather this?	N/A

4. How does the policy meet the different needs of and impact on groups in the community?

Equality Groups	Comments – positive/ negative impact
Older people, people in the middle years,	Older people are often able to access specifically for their needs such as extra care and amenity housing.
Young people and children	It is recognised that the allocation of social rented housing can alleviate instances of child poverty as household expenditure is often reduced for families moving into accommodation. In addition, children and young people may be given additional priority if they have medical needs or to help alleviate poor housing circumstances such as overcrowding.
Women, men and transgender people (includes issues relating to pregnancy and maternity)	The Housing Allocation accords with Equally Safe: Scotland's Strategy to prevent and eradicate violence against women and girls to ensure housing interventions are early and effective, preventing violence and maximising the safety and wellbeing of women, children and young people.

Disabled people (included physical disability; learning disability; sensory Impairment; long term medical conditions; mental health problem)	The Housing Service develops and maintains housing stock which caters for a wide range of health needs. Applicants with medical needs are given additional priority if moving to another property would be better suited to their needs.
Minority ethnic people (includes Gypsy/Travellers migrant workers non-English)	The housing allocation policy works upon a groups and points system and will allocate points based on individual circumstances and not on the basis of gender.
Refugees and asylum seekers	Specific legislation relates to housing allocations to refugees and asylum seekers.
People with different religions or beliefs (included people with no religion or belief.	The housing allocation policy works upon a groups and points system and will allocate points based on individual circumstances and not on the basis of religious belief.
Lesbian; gay bisexual and heterosexual people	The housing allocation policy works upon a groups and points system and will allocate points based on individual circumstances and not on the basis of sexual orientation.
People who are unmarried; married or in a civil partnership	The housing allocation policy works upon a groups and points system and will allocate points based on individual circumstances and not on the basis of marital status.
Those vulnerable to falling into poverty	
Unemployed	Income is not taken into account as part of the Housing
People on Benefits	

	Allocation Policy.
Single Parents and vulnerable families	The Housing Allocation Policy prioritises households who have difficult housing circumstances.
Pensioners	
Looked after Children	
Those leaving care settings ((including children and young people and those with illness)	
Homeless People	There is a significant impact upon homeless people as a result of the Housing Allocation Policy. As a result of the need to vastly reduce the time it takes Midlothian Council to provide permanent accommodation the review has recommended changes to the Policy to be able to offer permanent accommodation more quickly to homeless households. The impact of the Policy changes will be monitored.
Carers (including young carers)	The Housing Allocation Policy prioritises households who have difficult housing circumstances and potentially living in/or at risk of poverty.
Those involved in the criminal justice system	
Those living in the most deprived communities (bottom 20% SIMD areas)	
People misusing services	Fraudulent information could lead to a tenancy being terminated.
People with low literacy/numeracy	Housing support can be provided to households who need this to live independently.
Others e.g. veterans, students	Specific measures support veterans who are given priority for housing.

Geographical Communities	
Rural/ semi-rural Communities	There are fewer social rented homes in rural/semi-rural communities in Midlothian but applicants are able to choose specific communities and can be given advice in terms of the availability of housing in these areas. Advice in terms of the Housing Allocation Policy can be provided via email or telephone rather than attending the housing office in Dalkeith.
Urban Communities	Most social rented housing is located in urban communities in Midlothian and most opportunities for further development are located within these communities.
Costal Communities	N/A

5. Are there any other factors which will affect the way this policy impacts on the community or staff groups?

Scottish Government legislation and engagement with the Scottish Housing Regulator will influence the Housing Allocation Policy. For example, the increased emphasis on rapidly rehousing homeless households requires Officers to consider the application of the Policy to ensure that the length of time taken to provide permanent accommodation to homeless households is reduced.

The Housing Service also needs to take account of the views of tenants and housing list applicants and undertook various methods to ensure this was comprehensive.

6. Is any part of this policy/ service to be carried out wholly or partly by contractors?

If yes, how have you included equality and human rights considerations into the contract?

Not applicable.

--

7. Have you considered how you will communicate information about this policy or policy change to those affected e.g. to those with hearing loss, speech impairment or English as a second language?

The Housing Allocation Policy, and Housing Application Form can be made available in different formats to suit the needs of specific groups.

8. Please consider how your policy will impact on each of the following?

Objectives	Comments
Equality and Human Rights	
Promotes / advances equality of opportunity e.g. improves access to and quality of services, status	The Housing Allocation Policy should lead to an increase in available lets in tandem with new housing development.
Promotes good relations within and between people with protected characteristics and tackles harassment	There are specific points to equality groups if they are victimised or harassed.
Promotes participation, inclusion, dignity and self- control over decisions	Housing List applicants have a range of options they can choose and they are consulted on before any changes occur.
Builds family support networks, resilience and community capacity	Additional points can be awarded in order to provide or receive support.
Reduces crime and fear of crime	The housing allocation policy promotes safer, sustainable communities.
Promotes healthier lifestyles including Diet and nutrition Sexual Health Substance Misuse Exercise and physical activity Life Skills	Poor housing conditions, including homelessness, are linked to poorer health circumstances for households.
Environmental	
Reduce greenhouse gas (GHG) emissions in Midlothian (including carbon management)	N/A

Plan for future climate change	N/A
Pollution: air/ water/ soil/ noise	N/A
Protect coastal and inland waters	N/A
Enhance biodiversity	N/A
Public Safety: Minimise waste generation/ infection control/ accidental injury /fire risk	N/A
Reduce need to travel / promote sustainable forms or transport	N/A
Improves the physical environment e.g. housing quality, public and green space	N/A
Economic	
Maximises income and /or reduces income inequality	Income is maximised for many tenants who pay the lower housing costs as a result of being allocated a tenancy.
Helps young people into positive destinations	Access to suitable housing can improve health, wellbeing and employment prospects.
Supports local business	N/A
Helps people to access jobs (both paid and unpaid)	N/A
Improving literacy and numeracy	N/A
Improves working conditions, including equal pay	N/A
Improves local employment opportunities	N/A

9. Is the policy a qualifying Policy, Programme or Strategy as defined by The Environmental Impact Assessment (Scotland) Act 2005?

N/A

10. Action Plan

Identified negative impact	Mitigating circumstances	Mitigating actions	Timeline	Responsible person

11. Sign off by Head of Service/ NHS Project Lead

Name Simon Bain , Housing Services Manager / Acting Head of Housing Services

Date 9th December 2019