

# Integrated Impact Assessment Form

Promoting Equality, Human Rights and Sustainability

<b>Title of Policy/ Proposal</b>	Draft consultative Local Housing Strategy 2021-26
<b>Completion Date</b>	4 <sup>th</sup> November 2020
<b>Completed by</b>	Simon Bain, Acting Head Housing Services
<b>Lead officer</b>	As above and Lesley Connell, Housing Strategy Officer

Type of Initiative:

Policy/Strategy                      Draft consultative Local  
Housing Strategy 2021-  
26

Programme/Plan                      Proposed

Project

Service                                      Not applicable

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.

The LHS sets out the strategy, priorities and plans for the delivery of housing and related services across Midlothian during 2021-26.

The LHS is the sole strategic document for housing in Midlothian, bringing together a wide range of housing related priorities into one place and enabling a co-ordinated response in terms of action. The LHS plays a number of important roles, including:

- Setting out the strategic direction of the Council and its partners to delivering quality housing and related services, to direct investment and meet identified need across the county.
- Outlining the Council's approach to meeting its statutory housing responsibilities in relation to homelessness, house condition and fuel poverty.
- Summarising the response to national housing priorities such as The Scottish Housing Quality Standard, The Energy Efficiency Standard for Social Housing, reduction in carbon emissions and supporting the development of sustainable communities, and reflecting the needs and priorities of local communities.
- Demonstrating how housing can contribute to improvements in health and wellbeing and influencing the effective integration of health and social care service.

### **What will change as a result of this policy?**

The LHS sets out a wide range of housing related actions, which once implemented will lead to the overall vision being met and priority outcomes being achieved.

The draft consultative LHS's strategic vision for housing in Midlothian is that all households in Midlothian will be able to access housing that is affordable and of good quality in sustainable communities. In order that this vision is realised, the LHS must ensure that the following outcomes are realised within the five year period of the Strategy. These outcomes are:

- Households have improved housing options across all tenures.
- Homeless households and those threatened with homelessness are able to access support and advice services and all unintentionally homeless



Data on populations in need	<p>Two SES plan Housing Need and Demands Assessments have been undertaken, published in 2011 and 2015; providing detailed evidence on housing need in Midlothian. The assessments analyse key housing market drivers in order to estimate future demand for housing. They provide a shared evidence base for the LHS and Local Development Plan. The evidence sets out the scale, nature, tenure and location of housing need and demand for affordable and market housing, broken down by 4 tenures: Market housing comprising owner occupied and private rented sector housing and affordable housing comprising intermediate tenures such as social and mid-market rent.</p> <p>A Housing Needs and Demand Assessment of Particular Needs Groups/Specialist Provision provides estimates of need and demand for specialist provision for a range of particular needs groups. It provides a clear evidence base link between the needs of equality groups set out in SESplan HNDA2 and the outcomes identified in the LHS.</p> <p>Local Housing Systems Analysis analyses key elements of the housing system within the wider housing strategy landscape and economic and demographic context. It highlights key emerging trends, projections, issues and challenges, providing a detailed understanding of the local housing system and to what extent it is working well or 'in balance'. It provides evidence on the populations in need in relation to different housing tenures.</p> <p>Further data sources include the Scottish Index of Multiple Deprivation and Scottish House Condition Survey.</p>
Data on service uptake/access	<p>Consideration is given to any relevant service specific reviews, which provide data on service uptake and outcomes. Consideration is given to the ability of groups to access services through individual service related IIAs.</p>
Data on quality/outcomes	<p>Data on quality and outcomes is derived from a range</p>

	of sources. The Scottish Social Housing Charter sets out key data in relation to social housing outcomes reported annually to the Scottish Housing Regulator. This enables some consideration of households in need i.e. through analysis of data on homelessness and housing support and outcomes in relation to Gypsy/Travellers.
Research/literature evidence	A wide range of research/literature evidence informs and underpins the draft consultative LHS. This includes wide ranging policy documents i.e. Homes Fit for the 21 <sup>st</sup> Century, the Scottish Government's Strategy and Action Plan 2011-20 and Housing to 2040 Scottish Government consultation document. It includes subject specific literature i.e. A Place to Stay, a Place to Call Home – A Strategy for the Private Rented Sector (2013). It also includes a range of non-housing specific literature which is considered helpful in informing the LHS i.e. The Keys to Life, Improving Quality of Life for People with Learning Disabilities (Scot Govt 2013).
Service user experience information	Midlothian recognises the value of service user experience in informing the draft consultative LHS and the importance of mainstreaming equalities. The draft consultative LHS has been informed by community and stakeholder consultation and engagement undertaken via social media and virtually during July and August 2020. An 8-week formal consultation will be undertaken during November and December including key stakeholders and service users and the Midlothian Peoples Equalities Group. It is anticipated this will provide evidence on the key housing issues and challenges as perceived by vulnerable groups and contribute towards shaping the strategic vision for the LHS. The consultation will be widely advertised and made available to the general public with feedback provided received in a range of ways.
Consultation and involvement findings	Findings from consultation and engagement will be set out in the final LHS 2021-26 in a supporting paper that underpins the LHS. This will evidence all feedback obtained through the formal consultation process and how this has been used to influence the final LHS.
Good practice guidelines	The LHS is informed by LHS Guidance (2019) and Housing Needs and Demand Assessment Guidance,

	both published by the Scottish Government.
Other (please specify)	<p>In accordance with the Housing (Scotland) Act 2001, the LHS must explain how equality issues have been considered and how statutory public=sector duties have been met. Equalities issues should be embedded throughout the LHS and informed by IIA.</p> <p>With regard to equalities, local authorities require to evidence that equalities issues have been addressed through the LHS. In particular:</p> <ul style="list-style-type: none"> <li>• Does the LHS demonstrate that the local authority understands and takes account of the needs of equality groups and there is evidence of effective mainstreaming (this means systematically considering equality and diversity at all stages of developing the LHS) of equalities? E.g. is there a clear link between the needs of equality groups in the HNDA such as older people, minority ethnic groups, disabled people, young people and Gypsy/Travellers and the outcome identified in the LHS?</li> <li>• Has meaningful engagement with equality groups / consultative bodies influenced the LHS?</li> <li>• Are there clear links with the local authority's Gender, Race and Disability Equality Schemes and other relevant equality strategies?</li> </ul> <p>The LHS development process has ensured the mainstreaming of equalities at all stages of developing the LHS including consulting with the Midlothian Peoples Equalities Group.</p> <p>There are clear links with Midlothian Council's Equality Plan 2017-21.</p>
Is any further information required? How will you gather this?	Not applicable.

**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,	Midlothian has an ageing population. The LHS includes a range of actions focussed on older people. There are good links in place between the LHS and Health and Social Care Strategic plan, via the Housing Contribution Statement.
Young people and children	<p>The LHS recognises the needs of the most vulnerable young people and children are met through the LHS chapter on homelessness, which proposes to end the use of bed and breakfast accommodation and implement the National House Project prevention pathway for looked after young people. There are good links in place between the LHS and the Corporate Parent Strategy.</p> <p>Families and children at risk of or experiencing fuel poverty are targeted through service provision. There is also recognition of the importance of provision for tailored play services on the Gypsy/Traveller site.</p> <p>A significant amount of work and service development has occurred in recent years, focussing upon homelessness and young people including raising awareness in schools and developing a protocol / pathway for looked after young people.</p>

	<p>First time buyers have experienced particular difficulties in accessing the owner-occupier sector over recent years, emphasised during the economic downturn. As a result, younger people are likely to face particular difficulties securing accommodation in the sector, which may reduce housing options for this group.</p> <p>Young people are more likely to have a lack of awareness around housing options and their rights and responsibilities as a tenant in the private rented sector.</p> <p>Young people under the age 35 face financial inequalities with regard to the single room rent regulations.</p> <p>The Unsuitable Accommodation Order relates to homeless households with children or a pregnant family member. The Scottish Government legislation is very ambitious and sets challenging targets for local authorities. This will require ongoing reviews of the system of temporary accommodation.</p>
Women, men and transgender people (includes issues relating to pregnancy and maternity)	<p>Limited research was previously carried out to inform the LHS 2013-17 on LGBT people and housing inequalities. Understanding the Housing Needs and Homeless Experiences of LBBT People in Scotland (Stonewall 2009) and engaging with Midlothian Peoples Equalities Group will further inform the LHS 2021-26.</p>



<p>Disabled people (included physical disability; learning disability; sensory Impairment; long term medical conditions; mental health problem)</p>	<p>The LHS includes a specific section on people with a physical disability and sensory impairment, linking to aids and adaptations and tele-care. It also includes specific sections on people with a mental health condition, people with a learning disability and people with autism, with an action plan in relation to the provision of specialist accommodation in relation to these groups and actions in relation to improving processes.</p> <p>Midlothian Council has a dedicated team who co-ordinate adaptations in Council properties and privately owned housing.</p> <p>All new build social rented housing is built to Housing for Varying Needs Standard. This seeks to enable tenants to remain in their homes for longer with further adaptation if required. All new private sector housing must also comply with relevant Building Regulations.</p>
<p>Minority ethnic people (includes Gypsy/Travellers migrant workers non-English)</p>	<p>Ethnic minorities are four times more likely to live in overcrowded housing, with Polish, Bangladeshi and African people experiencing the highest levels of overcrowding (2011 Census). The LHS and SHIP sets out the delivery of a range of house sizes including larger house sizes, potentially suitable for ethnic minority families.</p> <p>The LHS includes specific section on Gypsy/Travellers.</p>

	<p>The LHS seeks to improve the housing conditions and standards of Gypsy/Travellers on the local authority site, unauthorised encampments and private sites.</p> <p>Ethnicity data is collected as part of the Council and RSL application process which is used to monitor access to housing and housing outcomes. General needs housing applicants have a choice in terms of type and location of properties, which enables BME communities to apply to live in locations they would feel most comfortable. Housing applications are dealt with in a non-discriminatory manner, taking account of relevant equalities duties.</p>
Refugees and asylum seekers	The LHS contains a section on refugees, aiming to improve the quality of life for those housed in Midlothian.
People with different religions or beliefs (included people with no religion or belief.	No specific research has been undertaken to inform the LHS. The Council has established links with local churches to consider the involvement in alleviating homelessness.
Lesbian; gay bisexual and heterosexual people	See above.
People who are unmarried; married or in a civil partnership	No impact anticipated.
Those vulnerable to falling into poverty	
Unemployed	Unemployed people, older people, families with young children and households with a

	disabled person tend to be more at risk of fuel poverty as these groups typically spend a larger proportion of time at home. With an ageing population and a likely growth in the number of disabled people it is likely that there will be an increased group whose health and wellbeing is potentially affected by fuel poverty.
People on Benefits	Welfare reform is further exacerbating inequalities, particularly in relation to Universal Credit. Issues also exist for younger people in relation to single room rent regulations in the private rented sector. The LHS will seek to mitigate the impacts of Welfare Reform where appropriate.
Single Parents and vulnerable families	As above.
Pensioners	An ageing population means that pensioners in Midlothian will continue to use increasing levels of service provision which will impact upon housing provision, adaptations service, housing support and telecare.
Looked after Children	See section above. Good links with Midlothian Council's Children's and Families Social Work Service.
Those leaving care settings ((including children and young people and those with illness)	As above.
Homeless People	See section above.
Carers (including young carers)	The LHS links to the Health and Social Care Strategic Plan

	through a Housing Contribution Statement. The Strategic Plan includes evidence and actions relating to carers in relation to accommodation and respite care provision.
Those involved in the criminal justice system	No specialist housing requirements are identified for this group. There is provision within the Rapid Rehousing Transition Plan to better meet the needs of this homeless grouping, including Housing First Programme and shared accommodation.
Those living in the most deprived communities (bottom 20% SIMD areas)	The LHS will ensure that service provision is targeted at areas of deprivation as appropriate. There are clear links between the LHS and other relevant Council strategies.
People misusing services	Housing and homeless services close links with the services based at 11 St Andrews Street, Dalkeith in respect of the provision of housing and support services.
People with low literacy/numeracy	The LHS acknowledges that certain groups may experience difficulties in navigating the housing system due to low literacy and numeracy. Tenancy support services are commissioned to support service users and tenants appropriately. Midlothian Council's Housing Options Development Officer work outcomes focus on the provision of good quality and easily accessible housing information.

Others e.g. veterans, students	The LHS acknowledges that veterans face particular issues in relation to accessing and sustaining housing. The LHS will link to the Armed Forces Covenant that underpins commitment in respect of housing provision.
<b>Geographical Communities</b>	
Rural/ semi-rural Communities	The draft LHS notes the specific inequalities relating to people living in rural communities. Rural housing typically experiences higher rates of fuel poverty, lower levels of energy efficiency, higher rates of empty buildings and disrepair. This is linked to generally lower levels of household income. The draft LHS seeks to mitigate the difficulties associated with rural housing by improving knowledge and understanding of private sector stock in rural areas, targeting energy efficiency advice at rural stock.
Urban Communities	The draft LHS focusses on town centres in accordance with LHS Guidance. Evidence suggest that residential dwellings in town centres have a high correlation with high levels of disrepair, poor energy efficiency, BTS dwellings and fuel poverty. The LHS aims to mitigate against this by improving knowledge of private sector stock and ensuring housing is a key component of strategies to regenerate town centres. The LHS also focuses on how town centres can

	contribute to local housing need and demand.
Coastal Communities	Nor applicable.

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

Not applicable.

**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?

The LHS Action Plan will set out lead Council officer responsibilities. However, where individual actions are carried out in part by contractors (e.g. energy advice, tenancy support, new build affordable housing), this would be subject to procurement processes as appropriate. Commissioned contractors would require to tender for work and as part of this process, be able to demonstrate how equality and human rights considerations have been addressed.

**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 LHS will be available in different formats and languages upon request.

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

Objectives Equality and Human Rights	Comments
Promotes / advances equality of	The LHS promotes equality of

<p>opportunity e.g. improves access to and quality of services, status</p>	<p>opportunity. There is a specific chapter on preventing, reducing and alleviating homelessness, which includes consideration of access to services for homeless people, takes account of existing processes and where these could be improved and outcomes for homeless households experiencing homelessness. The LHS links to the Council's RRTP.</p> <p>The LHS seeks to advance equality of opportunity for Gypsy/Travellers recognising their particular housing circumstances lead to inequalities. Other vulnerable groups covered include people with physical disability, people with mental health and learning disability.</p> <p>The LHS also covers areas where circumstances led to inequalities i.e. people living in rural areas, fuel poverty, housing in disrepair.</p> <p>The LHS includes an action plan, which sets out actions to mitigate against identified inequalities.</p>
<p>Promotes good relations within and between people with protected characteristics and tackles harassment</p>	<p>The LHS links to work undertaken to improve relations between Gypsy/Travellers and the settled community and also tackle harassment within the Gypsy/Traveller community itself.</p>
<p>Promotes participation, inclusion, dignity and self-control over decisions</p>	<p>The LHS consultation plan promotes participation from stakeholders, service users, vulnerable and protected characteristic groups to developing the LHS.</p>
<p>Builds family support networks, resilience and community capacity</p>	<p>The LHS seeks to improve community resilience and capacity in respect of creating sustainable and vibrant communities. It aims to build resilience and community capacity around ageing population and to alleviate</p>

	homelessness.
Reduces crime and fear of crime	There are proven links between the provision of secure affordable accommodation and reducing levels recidivism. New build housing is built subject to secure by design standard which contributes towards a feeling of safety.
Promotes healthier lifestyles including Diet and nutrition Sexual Health Substance Misuse Exercise and physical activity Life Skills	The LHS seeks to promote healthier lifestyles for those groups identified as having poor health, linking with Health and Social Care Strategic Plan.
<b>Environmental</b>	
Reduce greenhouse gas (GHG) emissions in Midlothian (including carbon management)	The LHS includes a specific chapter on fuel poverty and climate change, recognising that housing is a key contributor to greenhouse gas emissions and including a range of actions to reduce emissions in accordance with national targets. The LHS has close links to the Midlothian Council aim of making the council's activities net-zero carbon by 2030 and the Climate Change Strategy and Action Plan.
Plan for future climate change	The LHS includes a range of measures to increase energy efficiency, to both mitigate climate change and reduce fuel poverty.
Pollution: air/ water/ soil/ noise	As above
Protect coastal and inland waters	Not applicable
Enhance biodiversity	Not applicable
Public Safety: Minimise waste generation/ infection control/ accidental injury /fire risk	Not applicable
Reduce need to travel / promote sustainable forms of transport	It recognises the importance of place making in relation to new housing developments, particularly to ensure social inclusion of vulnerable groups.



Improves the physical environment e.g. housing quality, public and green space	As above.
<b>Economic</b>	
Maximises income and /or reduces income inequality	The LHS supports existing services in place.
Helps young people into positive destinations	The National House Project and other initiative linked to the Corporate Parent Strategy evidence commitment.
Supports local business	This is promoted via Procurement Policy.
Helps people to access jobs (both paid and unpaid)	As above. The LHS includes ambitious housing supply targets for both market and affordable housing which should increase employment opportunities in construction sector and reduce income equality and boost local economies.
Improving literacy and numeracy	As above.
Improves working conditions, including equal pay	The Council's Procurement Policy ensures good working conditions and supports the Living wage.
Improves local employment opportunities	As above.

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

Yes

**10. Action Plan**

Identified negative impact	Mitigating circumstances	Mitigating actions	Timeline	Responsible person
Welfare reform is having a negative impact upon vulnerable people.	Not applicable	Provide affordable housing options.	2021-26	Housing Services Manager

Information held on BME communities in relation to affordable housing is used to limited effect and this could be improved.		Improve data collection and analysis.		Housing Strategy Officer.

### **11. Sign off by Head of Service**

Name Simon Bain, Acting Head Housing Services

Date 4<sup>th</sup> November 2020