

Stage one: Rapid Impact Assessment

Part 1: Description/Consultation

Date of Assessment: Autumn 2015/Summer 2016	
Title of document being assessed: LOCAL HOUSING STRATEGY	
<p>1. This is a new policy, procedure, strategy or practice being assessed.</p> <p>(If yes please tick check box) <input type="checkbox"/></p>	Revision and update
<p>2. Please give a brief description of the policy, procedure, strategy or practice being assessed.</p>	<p>The Local Housing Strategy (LHS) sets out the housing vision of Argyll and Bute Council and our strategic partners for the future of housing across all tenures and types of accommodation, taking account of national priorities as well as local needs. It is based on a detailed Housing Needs and Demand Assessment which has been appraised as “robust and credible” by the Scottish Government. The main purpose of the Strategy is:</p> <ul style="list-style-type: none"> • To show the links between national housing priorities and local requirements. • To identify the broad picture of investment needs for existing and new housing. • To show how housing circumstances will be improved across all tenures.
<p>3. What is the intended outcome of this policy, procedure, strategy or practice?</p>	<p>The LHS aims to deliver a housing system that makes a strong contribution to thriving & sustainable communities and supports economic growth.</p> <p>There are 4 high level outcomes:</p> <ul style="list-style-type: none"> • People can access to sufficient, suitable and affordable housing across all tenures; • People can access an effective personalised Housing Options service to meet their needs; • People are enabled to live independently in their own home; and • Communities are regenerated by improving housing quality, condition and energy efficiency
<p>4. Please list any existing documents which have been used to inform this Equality Impact Assessment.</p>	Argyll & Bute HNDA, 2016 LHS Guidance, Scottish Government, 2014
<p>5. Has any consultation, involvement or research with protected characteristic groups informed this assessment? If yes, please give details.</p>	<p>Scottish Govt./CHMA - Equalities Evidence Finder Commissioned Research – Housing & Support needs of Ageing population 2014; Private Rented Sector 2013; Atlantic Islands Local House Condition Survey 2015; In-house studies - Gypsy/Travellers Study 2014/15; Learning Disabled Housing Needs Study 2015/16. Consultation - Stakeholders Conference; LHS workshops & Options Appraisal sessions; draft LHS consultation survey</p>

<p>6. Please give details of council officer involvement in this assessment.</p> <p>(eg names of officers consulted, date of meetings etc)</p>	<p>LHS Team – Allan Brandie, Jo McDill (Nov2015-August 2016) HMT – Moira MacVicar, Bill Halliday, Douglas Whyte, Margaret-Ann Moran, Flora Lamont – April-August 2016</p>
<p>7. Is there a need to collect further evidence or to involve or consult protected characteristic groups on the impact of the proposed policy?</p> <p>(Example: if the impact on an individual or group is not known what will you do to gather the information needed and when will you do this?)</p>	<p>The assessment of needs has been extensive, and LHS engagement has provided opportunities for all groups to participate. On an ongoing basis however we will continue to engage with representatives of specific protected characteristic groups, where additional information may prove useful to enhance current understanding e.g. minority ethnic groups, persons with mental health issues, wheelchair users, and others as required</p>

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Part 2: Protected Characteristics

Which protected characteristics will be positively or negatively affected by this policy, procedure or strategy?

NB Please place an X in the box which best describes the “overall” impact. It is possible for an assessment to identify that a positive policy can have some negative impacts and vice versa. When this is the case, please identify both positive and negative impacts in Part 3 of this form.

If the impact on a protected characteristic group is not known please state how you will gather evidence of any potential negative impacts in box Part 1 section 7 above.

If there is a negative impact against a protected characteristic then a full EqIA (Stage 2) should be completed.

Protected characteristic	Positively	Negatively	No Impact	Not Known
Age	X			
Disability	X			
Ethnicity	X			
Gender	X			
Gender reassignment			X	
Marriage and Civil Partnership			X	
Pregnancy and Maternity	X			
Religion			X	
Sexual orientation			X	

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Part 3: Impacts/Monitoring

<p>1. Have any positive impacts been identified?</p> <p>(We must ensure at this stage that we are not achieving equality for one strand of equality at the expense of another)</p>	<p>Yes</p> <p>Improved access to suitable accommodation & support services to enable independent living. Particular focus on specialist provision for equalities groups & protected characteristics.</p>
<p>2. Have any negative impacts been identified?</p> <p>(Based on direct knowledge, published research, community involvement, customer feedback etc.)</p>	<p>None</p> <p>Professional assessments, knowledge & experience. Direct consultation & engagement. Published research & local community involvement & service user feedback.</p>
<p>3. What action is proposed to overcome any negative impacts?</p> <p>(eg involving community groups in the development or delivery of the policy or practice, providing information in community languages etc.)</p>	<p>No negative impacts identified. Current actions & practices address issues & will continue to do so.</p>
<p>4. Is there a justification for continuing with this policy even if it cannot be amended or changed to end or reduce inequality without compromising its intended outcome?</p> <p>(If the policy shows actual or potential unlawful discrimination you must stop and seek advice)</p>	<p>Statutory requirement – but no such amendment required.</p>
<p>5. Has a 'Full' Equality Impact Assessment been recommended?</p> <p>(If the policy is a major one or is likely to have a major impact on protected characteristic communities a Full Equality Impact Assessment may be required).</p>	<p>Yes – major strategy likely to have significant impact on equalities groups in particular.</p>
<p>6. How will the policy be monitored?</p> <p>(How will you know it is doing what it is intended to do? Eg data collection, customer survey etc.)</p>	<p>A formal Monitoring & Evaluation framework will be implemented based on a SMART action plan and informed by ongoing data collection (via the Housing Management Reporting system, Abritas) & stakeholder consultation/engagement.</p>

Part 4: Contact Information

Name of Department: COMMUNITY SERVICES - HOUSING SERVICES	
Manager Responsible	
Name: MOIRA MacVICAR	
Designation: HOUSING SERVICES MANAGER	
Telephone: 01631 572184	
Email: Moir.MacVicar@argyll-bute.gov.uk	
Signature Leader Officer: 	Date: 05.09.16
Signature of Director/Head of Service: <i>Donald MacVicar</i>	Date: 05.09.16
Name of Director/Head of Service: Donald MacVicar	
Date of Next Policy Review: 2021	

Stage two: form for carrying out a full equality impact assessment

1: Policy or function details

<p>Name of policy or function <i>(Insert the name of the policy, strategy, project, funding application, initiative or financial decision)</i></p>	<p>LOCAL HOUSING STRATEGY 2016-2021</p>
<p>Lead officer/person <i>(The name of the officer who is responsible for developing the policy)</i></p>	<p>ALLAN BRANDIE</p>
<p>Supporting team (names/job titles) <i>(This should list all members of the team who are providing support to the lead officer in carrying out the EqIA. This should include:</i></p> <ul style="list-style-type: none"> • <i>At least one person involved in developing the new policy</i> • <i>One person from another service who has not been involved in developing the policy</i> <p><i>If wider expertise is required then it may be helpful to consider inviting one or two others to join the assessment process including representatives from outwith the Council if appropriate</i></p>	<p>Jo McDill, Research & Development Assistant Moir MacVicar, Housing Services Manager Bill Halliday, Team West Leader Douglas Whyte, Team East Leader Margaret-Ann Moran, Senior Welfare Rights Officer Flora Lamont, Housing Systems Co-ordinator</p>

<p>What are the main aims of the policy? <i>(bullet points describing the aims of the policy).</i></p> <p><i>(Should also include reference to other relevant Council documents such as the Corporate Plan and Service Plans)</i></p>	<p>The LHS seeks to deliver:- A housing system in Argyll & Bute that makes a strong contribution to thriving and sustainable communities and economic growth.</p> <p>Key aims:</p> <ul style="list-style-type: none"> • To facilitate access to sufficient, suitable & affordable housing across all tenures • To promote individual housing options to meet housing need • To enable people to live independently in their own homes • To regenerate communities through improving the quality, condition and energy efficiency of housing <p>The LHS supports and contributes to the Scottish Government's vision for housing that "All people in Scotland live in high quality sustainable homes that they can afford and that meet their needs".</p> <p>It also links directly with the Single Outcome Agreement for Argyll & Bute which aims "to grow our population and economy".</p> <p>Other relevant Council documents include: Corporate Plan; Local Development Plan; Economic Development Plan; and the Health & Social Care Strategic Plan</p>
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Who will benefit? <i>(A summary of the equality groups that are likely to benefit from the policy)</i>	In effect all local residents (individuals and families) and those aspiring to move to the area, including: elderly, young persons, disabled, ethnic groups such as Gypsy/Travellers, women fleeing domestic abuse & other vulnerable households.
Is the policy intended to increase equality of opportunity by permitting positive action or action to redress disadvantage? <i>(You should outline if your policy or function has been specifically developed to increase equality of opportunity by having a positive differential impact on any of the protected characteristics)</i>	Yes – the LHS sets out specific actions, policies, measures & targets for increased equality of opportunity; and has been purposely designed to promote positive outcomes and to eradicate disadvantage or discrimination.

2: What are the likely impacts of the policy?

For each protected characteristic you should identify any particular impact that the policy may have for the group. Impacts could be positive or negative and both should be described.

If there are no impacts on a particular protected characteristic then state your reasons for this within the response box. This demonstrates that you have considered the impact on each characteristic.

Will the policy impact on the whole population of Argyll and Bute? Will the policy impact on and or/ particular groups within the population of Argyll and Bute? <i>(Specify whether the policy will impact upon the whole community or will there be particular emphasis on one or more groups)</i>	The LHS has implications potentially for the whole population (home owners, renters, homeless and others). Specific aspects of the strategy will also have a particular impact on specific equalities groups within the population.
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Consider the following protected characteristics, What are the likely impacts for the group or community?

List any positive and/or negative impacts

Protected characteristic	Positive and/or negative impacts
Race: relating to people from different racial groups, ethnic or national origins, ethnic minorities, including gypsy travellers and migrant workers	Some ethnic groups may require access to information, advice & support in particular languages or formats. The LHS will promote & provide for this via the Housing Options service. The requirement for Gypsy/Traveller sites, pitches & support services is assessed & monitored via the HNDA & LHS – and any identified needs will be addressed. The LHS must adhere to legislation regarding unlawful discrimination therefore no negative impact is identified. Any specific ethnic groups requiring particular accommodation (eg larger properties for extended Pakistani and Bangladeshi families) are treated equitably with any other mainstream household.
Gender: specific to women and/or men	The LHS promotes equality of opportunity for males & females, and will ensure that the housing & housing-related service needs of all are

	addressed, including those fleeing domestic abuse (who tend to be predominantly female). Pregnancy & maternity are given specific additional treatment in terms of RSL allocation policies & appropriate support services to ensure no disadvantage occurs.
Disability: relating to people with either mental or physical disability	The LHS is specifically developed to promote equality of opportunity for persons who are physically or mentally disabled. Accommodation, care & support needs have been assessed in detail via the HNDA process and a key priority of the strategy relates to supporting independent living at home or in a homely setting through appropriate specialist provision. This will include appropriate housing (with targeted investment in bespoke properties on occasion), a range of aids & adaptations, and telecare services among other measures. Where gaps in the evidence base were identified, dedicated research was carried out – e.g. for Learning Disabled. The LHS makes positive commitments to align with, and deliver enhanced contribution to, the evolving Health & Social Care integration agenda, which will in turn provide a positive benefit for disabled persons & those with particular health issues.
Age: relating to different age groups e.g. older people or children and young people	Homelessness can affect disproportionate number of young people, particularly those leaving institutions; fuel poverty tends to be most extreme amongst older people; and in general there are a number of housing-related issues that affect the ageing population. Through dedicated research and analysis in the HNDA, the needs of various age cohorts have been identified and the LHS contains specific actions and targets to address these through the provision of specialist accommodation & care & support services.
Religion or Belief: relating to a person's religion or belief (including non-belief)	No negative effects identified. Possible potential for harassment due to religion or belief is addressed within Allocation Policies & RSL Estate Management procedures, however, generally the LHS will have a neutral impact.
Sexual orientation: relating to a person's sexual orientation i.e. lesbian, gay, bi-sexual, heterosexual	As above.
Marriage and civil partnership: Issues relating to people who are married or are in a civil partnership	Neutral. No negative impacts identified.
Gender reassignment: relating to people who have proposed, started or completed a process to change his or her sex	As above.
Pregnancy and maternity: issues relating to the condition of being pregnant or expecting a baby and the period after the birth	Positive impact in terms of RSL allocation policies & support services to enable access to suitable accommodation & tenancy sustainability.

3: Evidence used in developing the policy

Set out the evidence on impacts that you have collected in the development of the policy.

<p>Involvement and consultation</p> <p>In assessing the impact(s) set out above what evidence has been collected from involvement, engagement or consultation? Who was involved, when and how?</p> <p><i>Both equalities legislation and the duty to achieve best value demand effective consultation and engagement.</i></p> <p><i>Therefore, we need evidence of engagement with those groups that are targeted by the introduction of a new policy.</i></p>	<p>Stakeholder engagement has involved:</p> <ul style="list-style-type: none"> • LHS Conference • Workshops & option appraisal events • Online surveys • Electronic mailings • Service user focus groups • Thematic partnership fora • Interviews & group sessions • Networking, attendance at partner meetings & events etc. <p>Core consultation was carried out from Sept 2015 to April 2016, however engagement feeding into the LHS development process has been ongoing for a number of years.</p> <p>The basic framework and specific details of the LHS (vision, outcomes & priorities, action plan) have been directly informed by this engagement & consultation.</p> <p>Face to face interviews and supportive technologies for those wishing to respond to telephone or email surveys was utilised by consultants following best practice to ensure full inclusion.</p>
<p>Data and research</p> <p>Please specify what research was carried out or data collected, when and how this was done, and what other available research or data did you use.</p> <p><i>Set out any local or national data that has been used, in the impact assessment including any relevant guidance that has influenced the development of the policy.</i></p>	<p>Key evidence was collated in the detailed & comprehensive HNDA 2016, following statutory legislation & guidance; and drawing on a wide range of secondary data (e.g. statistics derived from the CHMA/SG equalities evidence finder) as well as primary research. This included:</p> <p>Older Persons' Housing Needs (1,200 interviews with individuals as well as extensive consultation with professionals & specialists).</p> <p>Data gaps were addressed via dedicated studies into housing & support needs of three key client groups: Gypsy/Traveller's and Learning Disabled (as well as Travelling Show Persons)– involving face to face interviews; partner agencies satisfaction surveys; and contact with expert representatives.</p>
<p>Partners' data and research</p> <p>What evidence has been provided by partners?</p> <p>Please specify partners.</p> <p><i>Data and information from partner organisations can help to evidence impacts rather than duplicate efforts to consult and involve relevant groups.</i></p>	<p>RSL data returns provided evidence on specialist stock & support services; lets to equalities groups; and waiting lists for those with particular needs.</p> <p>Close liaison with emerging H&SC partnership ensured key data sets were analysed & aligned via the HNDA and Joint Needs Assessment processes.</p> <p>Support services for specific client groups such as youth, women suffering domestic abuse, and other vulnerable persons provided data on their client groups and caseloads.</p> <p>The bespoke IT management system, Abritas, has been developed to ensure access to detailed monitoring reports on specified equalities characteristics – this includes development of</p>

	reporting for Housing Options, PREVENT 1, Welfare Rights data and other service functions.
<p>Gaps and uncertainties</p> <p>Have any gaps or uncertainties been identified in your understanding of the issues or impacts that need to be further explored?</p> <p><i>Few policies are developed in the context of perfect information and understanding of all the issues. This part of the assessment offers an opportunity to highlight these gaps and uncertainties.</i></p>	<p>Further analysis of the needs of wheelchair users could be pursued; and the limited available data on ethnic minorities (given very small numbers involved) could be further explored. This will be addressed via in-house research and stakeholder engagement.</p>

4: Detailed Action Plan to address identified gaps in evidence and to mitigate negative impacts

No	Action	Responsible Officer(s)	Timescale
1	Enhance/continue to develop monitoring reports on specific equalities characteristics via the Abritas Data Management System	Housing Systems Coordinator Research & Development Officer	2017
2	More detailed review of BMEs – via in-house analysis of waiting list, homelessness & support services evidence & general demographic information.	LHS Team	Sept 2017
3	12 month review of the experience of resettled refugees	HMT	April 2017
4	Monitor & Review outcomes for LD clients	LHS Team	April 2018
5	Annual survey of Gypsy/Travellers plus twice yearly count	ACHA LHS Team	Annual Six-monthly
6	Wheelchair Users' HNDA	LHS Team	2018

Note: Please add extra rows as required.

5: Performance monitoring and reporting

Please describe how the policy will be taken forward. This will act as a record for future reviews and the monitoring of the policy.

<p>When is the policy intended to come into effect?</p> <p><i>Insert the date and name of the Committee meeting that will approve the policy.</i></p>	<p>Strategic Housing Forum Dec. 2016</p>
<p>When will the policy be reviewed?</p> <p><i>Insert the dates for the planned review of the policy.</i></p>	<p>Sept. 2021. (with annual updates in the interim)</p>

6: Summary

Name of policy:LOCAL HOUSING STRATEGY.....

This policy will help the council to meet the general equality duty to eliminate discrimination; advance equality of opportunity; and foster good relations as follows:

Eliminate discrimination

In determining how the policy will eliminate discrimination there is NO evidence to indicate that:

- the policy will result in less favourable treatment for particular groups;
- the policy may give rise to indirect discrimination;
- the policy is more likely to impede you in making reasonable adjustments

Advance equality of opportunity

In determining how the policy will advance equality of opportunity there is evidence that:

- actions have been taken to remove or minimise disadvantage
- the policy meet the needs of different groups; and
- the policy encourages increased participation of particular groups

Foster good relations

In determining how the policy will affect good relations, you should record whether it will help you to:

- tackle prejudice
- promote understanding

Please state how the information from the EqIA has been used to make decisions about future service.

The EqIA action plan has been transferred to the LHS Outcome template and will also inform future updates of the HNDA. This will have a direct influence on Housing Services involvement with the Health & Social Care Partnership for instance; and affects our services to persons requiring adaptations, housing support, specialist accommodation; information, advice & our Housing Options service. Specific attention to the needs of Gypsy/Travellers has been highlighted in the LHS and will continue to be promoted through joint action between the council and ACHA in particular. Awareness of the high level of young people impacted by homelessness as well as the higher instance of fuel poverty on older people and those with disabilities will influence ongoing monitoring of services and future decision-making in general.

When completed, the assessment must be signed off by the lead officer and by the relevant Head of Service:

Signed

Date

Lead officer: 	05.09.16
Head of Service: <i>Donald MacVicar</i>	05.09.16

Completed assessments must be sent to: Stephen Colligan / Jennifer Swanson, Improvement and Organisational Development, for quality control, recording and publishing on the council's website.