

Supporting Paper 3: East Lothian Local Housing Strategy 2018-23 –

Integrated Impact Assessment Form

(Promoting Equality, Human Rights and Sustainability)



Title of Policy/ Proposal	East Lothian Local Housing Strategy (LHS) 2018-23
Completion Date	Consultative Draft LHS 2018-23 complete Jan 2018 Final LHS 2018-23 anticipated to be published May 2018
Completed by	Nicky Sandford, Senior Strategy Officer
Lead officer	Nicky Sandford, Senior Strategy Officer

Type of Initiative:

- Policy/Strategy x
- Programme/Plan New or Proposed x
- Project Changing/Updated
- Service Review or existing
- Function
- Other

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

This LHS sets out the strategy, priorities and plans for the delivery of housing and related services across East Lothian from 2018-23.

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

The LHS is the sole strategic document for housing in East Lothian, 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; i.e. in relation to fuel poverty, house condition and homelessness.
- Summarising the response to national housing priorities i.e. the Scottish Housing Quality Standard (SHQS) and ESSH; town centre living; reduction in carbon emissions and supporting the development of sustainable communities, while also reflecting the needs and priorities of the local area.
- Demonstrating how housing can contribute to improvements in health and wellbeing and influencing the effective integration of health and social care.

2. 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 six priority outcomes being achieved.

The strategic vision for housing is that by 2023 we will have:

'Healthy, sustainable homes in vibrant communities, that meet increasing levels of need, reduce inequalities and improve wellbeing across all stages of people's lives'

Six priority outcomes are identified to inform this vision:

Priority Outcome 1: Sustainable and vibrant communities are created and maintained.

Priority Outcome 2: The supply of housing is increased and access to housing is improved across all tenures.

Priority Outcome 3: Homelessness is prevented as far as possible, with appropriate support in place to promote positive health outcomes and tenancy sustainment.

Priority Outcome 4: A wider range of specialist housing is provided to enable independent living where appropriate.

Priority Outcome 5: The condition, energy efficiency and where appropriate the management of existing stock is improved.

Priority Outcome 6: Fuel poverty is reduced and climate change targets exceeded.

The LHS will build on existing policies and practices, complementing, amending or replacing these as appropriate. An EQIA will be completed when making significant changes to existing policies and subsequent formal approval sought from East Lothian Council.

3. Do I need to undertake an Integrated Impact Assessment?

High Relevance		Yes/no
1. The policy/ proposal has consequences for or affects people		Yes
2. The policy/proposal has potential to make a significant impact on equality		Yes
3. The policy/ proposal has the potential to make a significant impact on the economy and the delivery of economic outcomes		Yes
4. The policy/proposal is likely to have a significant environmental impact		Yes
Low Relevance		
5. The policy/proposal has little relevance to equality		No
6. The policy/proposal has negligible impact on the economy		No
7. 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>No / minimal impact upon the environment, identified through Strategic Environmental Assessments. Environmental impacts are contained within the Local Development Plan as opposed to the LHS.</p>		

If you have answered yes to 1, 2, or 3 above, please proceed to complete the Integrated Impact Assessment.

If you have identified that your project will have a significant environmental impact (4), you will need to consider whether you need to complete a Strategic Environmental Assessment.

4. 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	Two SESplan Housing Need and Demand Assessments (SESplan HNDA1 and SESplan HNDA2) have been undertaken, published in 2011 and 2015, providing detailed evidence on housing need across the county. 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 in HNDAs sets out the scale, nature, tenure and location of housing need and demand for affordable and market housing, broken down by four distinct tenures: Market housing comprising private (owner occupied) and private rented sector housing and

	<p>affordable housing comprising intermediate tenures i.e. mid-market rent and social rented housing.</p> <p>A Housing Need 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 based 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 (LHSA) 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>The report on Researching the Demand and Need for Alternative Tenures in East Lothian, Rettie & Co / North Star Consulting & Research (2015) provides an evidence base of the need and demand for specific intermediate tenures across East Lothian and at local levels. It sets out the populations who may benefit from mid-market housing.</p> <p>Further data sources include the Scottish Index of Multiple Deprivation, Scottish House Condition Survey etc.</p>
Data on service uptake/access	Consideration is given to service reviews, which provide data on service uptake and outcomes. Consideration is also given to the ability of groups to access services through individual service related EQIAs.
Data on quality/outcomes	Data on quality / outcomes is derived from a range of sources. The Scottish Social Housing Charter sets out key data in relation to social housing outcomes i.e. data obtained during 2015/16 compared with 2016/17. This enables some consideration of households in need i.e. through analysis of data on homelessness and housing support. The Charter also sets out an equalities outcome and outcomes in relation to Gypsy / Travellers.
Research/literature evidence	A wide range of research / literature evidence informs and underpins the Consultative Draft LHS. This includes wide ranging policy documents i.e. Homes Fit for the 21 st Century, the Scottish Government's Strategy and Action Plan for the period 2011- 20. It includes subject specific

	<p>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 still considered helpful in informing the LHS i.e. The Keys to Life, Improving Quality of Life for People with Learning Disabilities, the Scottish Government (2013).</p>
<p>Service user experience information</p>	<p>East Lothian Council recognises the value of service user experience / information in informing the Consultative Draft LHS and the importance of mainstreaming equalities. Understanding that some people’s views may not readily be heard via the use of traditional engagement methods, 20 focus groups were held during 2016-17. These enabled service user experience information (in relation to vulnerable groups) to influence the LHS, promoting an inclusive approach to consultation from the start of the development process. The groups covered:</p> <ul style="list-style-type: none"> - Ex-offenders - Gypsy / Travellers - Homeless people - LGBT people - Older people and their carers - People with a learning disability and their carers - People with a mental health condition and their carers - People with a physical disability and / or visual impairment and their carers - Young care leavers - Young vulnerable people <p>The focus groups provide evidence on the key housing issues and challenges as perceived by vulnerable groups. Attendees at focus groups considered housing related priorities / outcomes; proposed a range of actions to meet those outcomes and contributed towards developing the strategic vision for the LHS. Feedback obtained was also used to inform this Equalities Impact Assessment.</p> <p>Two large scale events were also held as part of the Draft LHS development process, covering 3 days, which provided a further opportunity for service users to get involved and for the council to take account of their experience.</p> <p>An 8-week formal consultation period on the Consultative Draft LHS ran from January to March 2018, with the</p>

	consultation document distributed to over 200 stakeholders including Council departments, external statutory and voluntary agencies. The consultation was widely advertised and made available to the general public with feedback received via facebook, twitter etc.
Consultation and involvement findings	Findings from consultation and engagement are set out in 'East Lothian Local Housing Strategy 2018-23: Supporting Paper 1 – Consultation and Engagement', which underpins the LHS. This evidences 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 (2014) and Housing Need and Demand Assessment Guidance (2014), 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. This must be informed by an EQIA, which equality duties require public bodies to undertake as part of new policies and functions.</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"> • 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 (mainstreaming means systematically considering equality and diversity at all stages of developing the LHS) of equalities? For example, 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 outcomes identified in the LHS? • Has meaningful engagement with equalities groups / consultative bodies influenced the LHS? • Are there clear links with the local authority's Gender, Race and Disability Equality Schemes and any other relevant equality strategies? <p>The LHS development process has ensured the mainstreaming of equalities at all stages of developing the Strategy.</p>

	<p>Around 20 focus groups were held with equalities groups to provide opportunities to influence the LHS.</p> <p>There are clear links with the East Lothian Council Equalities Plan 2017-21.</p> <p>The LHS takes account of the following: Disability Discrimination Act 2005; Code of Practice on Racial Equality in Housing; the Single Equality Act 2010 and Race Equality Framework for Scotland (2013)</p>
Is any further information required? How will you gather this?	N/A

5. How does the policy meet the different needs of groups in the community?

	Issues identified and how the strategy addresses these
<p>Equality Groups</p> <ul style="list-style-type: none"> Older people 	<p>East Lothian has an ageing population. The LHS includes a range of actions focussed on older people i.e. provide 60 units of accommodation per annum and a range of housing prevention / low level interventions. People in middle to older years are also well covered via an action on housing health checks from age 55, to enable a preventative approach to housing prior to frail older age. There are good links in place between the LHS and Health and Social Care Strategic Plan, via the Housing Contribution Statement.</p> <p>It is recognised that older person households may be in need of increased support to organise and carry out repair and improvement work with enhanced services in place through the LHS to mitigate this. Care and Repair deliver a small repairs service which also assists independence and promotes home safety, with service users only charged for materials.</p>
<ul style="list-style-type: none"> Young people and children 	<p>The LHS recognises that East Lothian is projected to have a higher proportion of young people and children than the national average. The needs of the most vulnerable young people and children are met through the LHS chapter on homelessness, which includes actions around reducing B&B use for families with children. Families with children at risk of or</p>

<ul style="list-style-type: none">• Women, men and transgender people (includes issues relating to pregnancy and maternity)	<p>experiencing fuel poverty are targeted through service provision. There is also recognition of the importance of a children’s play area on the Gypsy Traveller site.</p> <p>A significant amount of work and service development has occurred in recent years, focusing upon homelessness and young people i.e. the Amber Mediation Project, awareness raising of homelessness prevention in schools and work carried out by the Tenants and Residents Panel to involve young people. A Through and Aftercare (TAC) protocol is in place and a number of accommodation based services have been developed specifically for young people with support provided at different levels.</p> <p>First time buyers have experienced particular difficulties in accessing the owner-occupied sector since 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 age 35 face inequalities with regard to the single room rent regulations.</p> <p>Targets must be met in relation to the provision of B&B accommodation for homeless households with children or a pregnant family member. Scottish Government targets are currently challenging to meet and with even more ambitious targets to be in place shortly, this will continue to be increasingly difficult. A review of the whole system of temporary accommodation will be a priority in accordance with the LHS action plan.</p> <p>Research was previously carried out to inform the LHS 2012-17 on LGBT people and housing inequalities. It is considered the findings of this research are relevant for this LHS 2018-23 and the study does not require to be updated.</p>
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<ul style="list-style-type: none"> • Refugees and asylum seekers • People with different religions or beliefs (includes people with no religion or belief) • Lesbian, gay, bisexual and heterosexual people 	<p>remain relevant for the LHS 2018-23, being updated i.e. with 2011 Census information.</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 (Source: 2011 Census). The LHS 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 sections on Gypsy / Travellers and travelling show-people. 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>RSLs in East Lothian use a choice based lettings system, which helps to eliminate unlawful discrimination. Ethnicity data is collected as part of the application process which can be used to monitor access to housing and housing outcomes. Applicants have a choice in terms of the type and location of properties, which enables BME communities to apply to live in locations where they would feel most comfortable. All applications to the Council housing list are dealt with in a non-discriminatory manner, taking account of relevant equal opportunities duties.</p> <p>The LHS contains a section on refugees, aiming to improve the quality of life for those housed in East Lothian.</p> <p>Some work was carried out on different religions and housing to inform the East Lothian LHS 2012-17. It is not considered appropriate to repeat this study again. Some work is being carried out with local churches to consider their potential involvement in alleviating homelessness.</p> <p>Some work was carried out on LGBT and housing to inform the LHS 2012-7. It is not considered appropriate to repeat this study again.</p> <p>N/A</p>
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<ul style="list-style-type: none"> • People who are unmarried, married or in a civil partnership 	
<p>Those vulnerable to falling into poverty</p> <ul style="list-style-type: none"> • Unemployed • People on benefits • Single Parents and vulnerable families • Pensioners • Looked after children / Those leaving care settings (including children and young people and those with illness) 	<p>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 large proportion of time at home. With an ageing population and a likely growth in the numbers of disabled people it is likely that there will be an increased group whose health and wellbeing is potentially affected by fuel poverty.</p> <p>Welfare reform is further exacerbating inequalities, particularly in relation to Universal Credit. Issues also exist for people under age 35 in relation to single room rent regulations. The LHS will seek to mitigate the impacts of Welfare Reform where appropriate / where possible and investigate alternative housing options i.e. flat sharing and build to rent.</p> <p>Covered elsewhere in this Impact Assessment Form</p> <p>An ageing population means that pensioners in East Lothian will continue to use increasing levels of service provision which will impact upon housing provision, adaptations services, housing support and telecare.</p> <p>A Through and Aftercare (TAC) protocol is in place and a number of accommodation based services have been developed specifically for young people with support provided at different levels. This LHS will review existing service provision.</p> <p>While it is widely acknowledged that there has been a significant amount of work carried out in relation to young homeless people in East Lothian, there remains a lack of services for young people with very complex needs, particularly with regard to accommodation with support. Young people are often required to go to Edinburgh for this, which is</p>

<ul style="list-style-type: none"> • Homeless people • Carers (including young carers) • Those involved in the community justice system • Those living in the most deprived communities (bottom 20% SIMD areas) • People with low literacy/numeracy • Others e.g. veterans, students 	<p>costly. A review of existing supported accommodation services will take place during 2018.</p> <p>Covered elsewhere in this Impact Assessment Form</p> <p>The LHS formally links to the Health and Social Care Strategic Plan through a Housing Contribution Statement. The Strategic Plan includes evidence and actions relating to carers including young carers, in relation to accommodation i.e. respite care.</p> <p>The LHS sets out evidence and actions in relation to people with a conviction. No specialist housing requirements are identified for this group, although some actions are identified in relation to protocols, to ensure efficient and effective processes are in place.</p> <p>The LHS sets out a profile of the six key towns in East Lothian, which enables a comparison of key indicators of deprivation at a glance. It is clear that while there are small pockets of deprivation in the East of the county, the majority of deprivation is concentrated in the west. The LHS ensures that service provision is targeted at areas of deprivation.</p> <p>The LHS acknowledges that certain groups may experience difficulties in navigating the housing system due to low literacy and numeracy. The LHS sets out actions to mitigate this; i.e. to produce a user-friendly guide to housing allocations policy for people with a learning disability.</p> <p>N/A</p>
<p>Geographical communities</p> <ul style="list-style-type: none"> • Rural/ semi-rural communities • Urban Communities • Coastal communities 	<p>Rural / semi-rural communities – The LHS has a specific section on rural communities in accordance with LHS Guidance. The draft LHS notes the specific inequalities relating to people living in rural communities, particularly where households are living off the gas grid. Rural housing typically experiences higher rates of fuel poverty, lower levels of energy efficiency, higher rates of empty buildings and higher rates of disrepair. This is compounded by generally lower disposable incomes in rural areas as people pay more money on transport, services etc. The draft LHS seeks to mitigate the difficulties associated with rural housing by improving knowledge and understanding of private sector stock</p>

	<p>in rural areas, targeting energy efficiency advice at rural stock and consideration of the provision of care in rural areas.</p> <p>Urban communities – The draft LHS focusses on town centres in accordance with Scottish Government LHS Guidance. Evidence suggests 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 town centre regeneration / town centre strategies. The LHS also focuses on how town centres can contribute to local housing need and demand.</p> <p>There is no requirement as per LHS Guidance to cover coastal communities and coastal communities are generally not considered to have specific housing requirements. Specific reference is made to coastal communities in the LHS in relation to the need for specific input where housing is at risk of flooding, in relation to climate change. A Climate Change Adaptation and Mitigation Strategy is being developed which will set out detailed action in relation to housing deemed to be at risk in relation to the impacts of climate change; i.e. flooding and coastal erosion.</p>
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6. Are there any other factors which will affect the way this policy impacts on the community or staff groups?

No

7. 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 sets out lead officers responsible for individual actions, which comprise of Council Officers. However, where individual actions are carried out in part by contractors, 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.

8. 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.

9. 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	<p>The LHS promotes equality of opportunity in many ways. There is a specific chapter on preventing, reducing and alleviating homelessness, which includes consideration of access to service for homeless people, takes account of existing processes, policies and procedures and where these could be improved and generally improving the quality of life for people who become homeless.</p> <p>The LHS seeks to advance equality of opportunity for a range of vulnerable groups i.e. Gypsy / Travellers, recognising that their particular housing circumstances lend to inequalities. Other vulnerable groups covered include people with a physical disability, people with a mental health condition, people with a learning disability etc.</p> <p>The LHS also covers areas where circumstances lead to inequalities i.e. people living in rural areas, people in extreme fuel poverty, housing in disrepair etc.</p> <p>The LHS includes an action plan, which sets out a wide range of actions to mitigate against identified inequalities.</p>
Promotes good relations within and between people with protected characteristics and tackles harassment	The LHS includes a specific section on Gypsy / Travellers, seeking to improve relations between Gypsy / Travellers and the settled community and also tackle harassment within the Gypsy / Traveller community itself.
Promotes participation, inclusion, dignity and self-control over decisions	<p>The LHS consultation has promoted participation from stakeholders, service users and vulnerable groups, taking a co-production approach to developing the LHS where possible.</p> <p>The LHS aims to promote the dignity and inclusion of all groups; i.e. older people and housing health checks from</p>

	age 55, to ensure older people can make their own housing related decisions where possible. A further example is covering community empowerment in relation to self-build and custom build.
Builds family support networks, resilience and community capacity	The LHS aims to build family support networks through the provision of mediation for young people asked to leave the family home / threatened with homelessness. It seeks to improve community resilience and community capacity in respect of creating sustainable and vibrant communities. It aims to build resilience around an ageing population and community capacity to alleviate homelessness
Reduces crime and fear of crime	The LHS covers estate management, housing renewal areas and town centre regeneration, which all contribute indirectly to a reduction of crime and fear of crime. Through work with Gypsy / Travellers, the LHS seeks to reduce crime and fear of crime for this group. 'Secured by Design' and 'Designing for Streets' standards for all new build housing developments can contribute towards a feeling of safety among older people and people with a physical disability.
Promotes healthier lifestyles including <ul style="list-style-type: none"> • 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 i.e. Gypsy / Travellers and homeless people. The LHS also includes a specific section on people with a mental health condition
Environmental	
Reduce greenhouse gas (GHG) emissions in East Lothian (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. It links to planning for future climate change by linking to the Climate Change Adaptation and Mitigation Strategy (currently under development although housing will be a key area) and projects such as flooding prevention in the Musselburgh area.
Plan for future climate change	
Pollution: air/ water/ soil/ noise	
Protect coastal and inland waters	
Enhance biodiversity	
Encourage resource efficiency (energy, water, materials and minerals)	

Public Safety: Minimise waste generation/ infection control/ accidental injury /fire risk	The LHS includes a wide range of measures to increase energy efficiency, to both mitigate climate change and also reduce fuel poverty. It recognises the importance of new housing sustainable travel and the need for 'placemaking' in relation to new housing developments, particularly to ensure social inclusion of vulnerable groups.
Reduce need to travel / promote sustainable forms or transport	
Improves the physical environment e.g. housing quality, public and green space	
Economic	
Maximises income and /or reduces income inequality	The LHS supports projects / organisations which help young people into positive destinations i.e. Bridges Project.
Helps young people into positive destinations	
Supports local business	The LHS includes ambitious housing supply targets for both market and affordable housing, which should increase employment in relation to lower paid jobs i.e. construction and reduce income inequality / boost the local economy.
Helps people to access jobs (both paid and unpaid)	
Improving literacy and numeracy	
Improves working conditions, including equal pay	The LHS includes actions in relation to employability i.e. for homeless people. With all contracted services undergoing a procurement process in relation to LHS actions, this ensures good working conditions and supports the Living Wage.
Improves local employment opportunities	The LHS includes ambitious housing supply targets for both market and affordable housing, which should increase employment in relation to lower paid jobs i.e. construction and reduce income inequality / boost the local economy.

10. Action Plan

Identified negative impact	Mitigating circumstances	Mitigating actions	Timeline	Responsible person
A lack of specialist housing is available for people with particular	A housing need assessment of particular needs	Levels of specialist housing to	December 2019	Wendy McGuire, Strategic

needs, which is of concern, particularly given the ageing population.	groups has been undertaken to ascertain levels of need	be made available will be agreed via the LHS and SHIP		Investment and Nicky Sandford, Housing Strategy
Welfare reform is having a negative impact upon a large number of vulnerable individuals. In particular, young people under age 35 face inequalities with regard to the single room rent regulations.	N/A	Mitigate Welfare Reform where appropriate / possible and investigate housing options i.e. build to rent	December 2019	Nicky Sandford, Housing Strategy
In relation to Below Tolerable Standard (BTS) dwellings, properties that have been occupied by the same resident for a significant period are more likely to fit the BTS criteria and therefore BTS issues are more likely to apply to older people.	N/A	Review policy on BTS dwellings	December 2019	Nicky Sandford, Housing Strategy
Muslim owner-occupiers may not be able to access traditional lending products although national research is ongoing into Shariah mortgages. These are slightly more expensive than taking out a conventional repayment or interest only mortgage. The Islamic mortgage products available cannot be used in	The Housing (Scotland) Act 2006 states that any low-cost initiatives for flexible tenure should address this issue to avoid precluding the Muslim community from participation.	Complete EQIA for the SHIP	End November, annually	Wendy McGuire, Strategic Investment

connection with existing low-cost home ownership schemes.				
Information held on BME communities in relation to affordable housing is used to limited effect and this could be improved significantly.		Improve data collection and analysis in this area		Nicky Sandford, Housing Strategy

Through annual reviews of the LHS, ongoing monitoring of service delivery to equality groups will be carried out, outcomes for equality groups taken cognisance of and any issues addressed where the strategy is not considered to be meeting the needs of equality groups.

11. Sign off by Head of Service

Name: Douglas Proudfoot

Date: 04 January 2018