

Integrated Impact Assessment Form

Promoting Equality, Human Rights and Sustainability



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Promoting Equality, Human Rights and Sustainability

Title of Policy/ Proposal	Council Housing Allocations Policy
Completion Date	March 2019
Completed by	
Lead officer	Angela Kirkham

Type of Initiative:

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

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.

East Lothian has long experienced a highly pressurized housing market. Both the private rented sector and owner occupation are seen as expensive and suffer from a shortage of supply. Social housing is seen as an affordable and desirable alternative, however, demand far outstrips supply. East Lothian Council have a housing stock of 8698 properties, with less than 500 becoming available for re-let each year. There are approximately 3,400 applications for re-housing on our housing register (April 2018).

The Allocations Policy describes how we let our Council houses and set priorities between applicants based on their housing needs. It covers both applicants to our housing list and tenants who want to transfer to other houses.

It sets out how we will meet our legal and good practice commitments, in particular, the range of housing needs specified in allocations and homelessness law.

The Allocations Policy review will ensure that we continue to offer equal opportunities for all applicants through an in depth understanding of the needs of service users as part of the allocations process and make best use of our housing stock.

2. What will change as a result of this policy?

- The Housing Allocations Policy 2019 will meet the requirements of the Housing (Scotland) Act 2014.
- The Policy will now consider some of the discretionary elements such as Home Ownership and suspensions at the point of application.
- There will be a change to the way homelessness points are awarded – with all applicants accepted under homelessness legislation receiving a flat rate of points.
- Homelessness applications will also be reviewed in conjunction with the Housing Options Team to ensure that the Council is able to discharge its homelessness duties by reviewing areas of choice and property types.
- There will be a change in the way overcrowding points are calculated – to reflect the different impacts overcrowding can have on families i.e. children sharing and bedspaces.
- Existing Council tenants occupying a shared stairway will be awarded points to allow them to move to a different property type.
- Private sector tenants with the new Private Residential Tenancy Agreement will not be entitled to insecurity points as they are now more secure.

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	No
4. The policy/proposal is likely to have a significant environmental impact	No
Low Relevance	
5. The policy/proposal has little relevance to equality	

6. The policy/proposal has negligible impact on the economy	
7. The policy/proposal has no/ minimal impact on the environment	
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.	

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	<p>Ethnicity – this has remained stable over the last reporting period with 98% of people characterising themselves as ‘white’ – the remaining 2% characterise themselves as ‘Asian’ (1%) & ‘Caribbean or Black’ (1%)</p> <p>32% of households in East Lothian contain someone with a long term physical/mental health condition. (Scottish Household Survey)</p> <p>Scottish Index of Multiple Deprivation (SIMD)</p> <p>Scotlands Census</p> <p>Housing Needs & Demand Assessment</p> <p>Local Housing Strategy</p>
Data on service uptake/access	<p>Owner occupation has dropped from a high of 72% in 2002 to 62% in 2016. Whilst social renting has stayed pretty much the same at 26%, we have seen an increase in the private rented sector from 5% to 11% in 2016. In terms of aspirations, 92% would like to own their homes</p>

	<p>and 7% aspire to social housing. (Scottish Household Survey)</p> <p>There is a high demand for housing in East Lothian and limited supply. Demand will increase for services due to ageing population.</p>
Data on quality/outcomes	<p>Performance Management Framework</p> <p>Scottish Housing Charter</p> <p>75.3% of households were fairly/very satisfied with the standard of their home when moving in. (ELC New Tenants Survey)</p> <p>92.8% of tenants were fairly/very satisfied with the quality of work carried out in their homes. (ELC Repairs Satisfaction Survey)</p>
Research/literature evidence	<p>Chartered Institute of Housing</p> <p>Scotland's Housing Network</p>
Service user experience information	<p>96% of people living in social housing rate their neighbourhood as a fairly good/very good place to live. (Scottish Household Survey)</p> <p>95.5% of tenants were satisfied with the overall standard of service when they moved into their new home (ELC New Tenants Survey)</p> <p>87.5% of households are fairly/very satisfied with the standard and quality of their homes. (ELC New Build Survey)</p> <p>92.8% of tenants were fairly/very satisfied with the quality of work carried out in their homes. (ELC Repairs Satisfaction Survey)</p>
Consultation and involvement findings	
Good practice guidelines	<p>Chartered Institute of Housing Good Practice</p> <p>TIS Allocations Guidance</p>

	Scottish Government Allocations Guidance
Other (please specify)	
Is any further information required? How will you gather this?	

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, people in the middle years, • Young people and children • Women, men and transgender people (includes issues relating to pregnancy and maternity) • Disabled people (includes physical disability, learning disability, sensory impairment, long-term medical conditions, mental health problems) 	<p>Specialist Housing specifically designed to meet the needs of older people i.e. sheltered/amenity housing.</p> <p>Foster carers/kin-ship carers can request an extra bedroom</p> <p>(Possible differences in homelessness presentations – more single males? More female single parents?) Interviews can be requested with a person of the same sex.</p> <p>Property designed & allocated to meet the needs of those with health conditions</p> <p>Health & Housing process available to assess health conditions and housing needs. Properties then adapted in order to meet those specific needs.</p> <p>Larger properties or specific property types can be allocated when</p>

<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 	<p>.</p> <p>Access to housing is available to those claiming benefits and by law does not take income into account. However, Universal Credit has seen significant delays in payments to the applicants and in turn increased rent arrears</p> <p>Welfare Reform has also impacted on those claiming disability benefits. The Welfare Rights Team are able to provide information & assistance.</p> <p>5% of households fall in to the SIMD 'most deprived' quintile. Those in the 'least deprived quintile have reduced from 21% in 2012 to 15% in 2016</p> <p>Tenancy Support Service offers support to tenants where required</p> <p>The needs of vulnerable families can be considered by our housing panels ie. Health & Housing/Re-housing Panel which look at housing needs</p> <p>Specifically designed property is available to meet the needs of older persons in order to make access to the amenities of day to day living easier</p> <p>Starter flats form part of the allocations policy to allow those leaving care to become familiar with</p>

<p>children and young people and those with illness)</p> <ul style="list-style-type: none"> • Homeless people • Carers (including young carers) • Those involved in the community justice system 	<p>managing their own property and the housing panels consider those who wish to move on and those with health problems</p> <p>Approved foster carers and ‘looked after’ kinship carers can apply for an extra bedroom to provide care for a child.</p> <p>The housing needs of homeless people are met by the allocations policy in that it covers all of the reasons for homelessness prescribed by law. In addition it further prioritises those who accommodated in temporary housing by increasing their award of points.</p> <p>Personal care and housing support funding has changed to allow an individual to make decisions about how their support needs are provided.</p> <p>Those carers that give up their main residence to care for someone are able to succeed to a tenancy or remain in the home should they have similar need</p> <p>The allocations policy recognises that those who leave prison and who are vulnerable will have difficulty in accessing accommodation. They are given priority to assist them in securing a home</p> <p>SOLO officer to carry out appropriate housing assessment.</p> <p>The use of SSST’s is available</p>
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<ul style="list-style-type: none"> • Those living in the most deprived communities (bottom 20% SIMD areas) • People misusing services • People with low literacy/numeracy • Others e.g. veterans, students 	<p>where necessary</p> <p>Income is not taken in to consideration when applying for housing. Staff are able to visit applicants/tenants in their homes to avoid the costs of travel.</p> <p>Welfare Rights Team are able to assist & offer advice. Those in rent arrears can agree re-payment plans by affordable instalments.</p> <p>Working towards more energy efficient stock to reduce fuel poverty (insulation, solar panels) & reduce energy consumption. Advice & assistance is available.</p> <p>When applicants provide false or misleading information, the Council can take action to suspend or cancel their application to the housing list. When existing tenants breach their tenancy agreement, the Council may apply to the courts to recover the property.</p> <p>Applicants can ask for assistance when completing the application forms and review processes. Staff are able to visit to help those who require assistance. The offer process does not require involvement from the applicant i.e. bidding that requires computer literacy.</p> <p>The policy recognises that those who have served in the Armed Forces for a period of time could be disadvantaged when trying to access the housing market. They are given additional priority that recognises</p>
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	their housing needs
Geographical communities <ul style="list-style-type: none"> • Rural/ semi rural communities • Urban Communities • Coastal communities 	Staff are able to visit applicants/tenants in their homes to avoid the costs of travel.

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

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?

No

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?

Policy and supporting information will be available in different formats e.g. Braille, large print, audiotape and translated into different 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	East Lothian Council aim to be fair, consistent, efficient and open in allocating properties to tenants. We aim to offer open and equal access to our housing and to allocate property based housing need
Promotes good relations within and between people with protected characteristics and tackles harassment	<p>Applications for housing are welcomed from all people regardless of sex or marital status, race, disability, sexual orientation, language, nationality or social origin, religious or political beliefs etc. We value diversity amongst the communities in which we work.</p> <p>We believe that everyone has the right to live their life free of harassment, violence and abuse and recognise this as a housing needs factor within our policy.</p>
Promotes participation, inclusion, dignity and self control over decisions	East Lothian Council encourages and support our tenants & residents to actively participate and become involved in the decision making process by promoting capacity building, offering opportunities for training and providing independent support to ensure that they are effective members of our working groups and are able to fulfil a vital role in their respective communities.
Builds family support networks, resilience and community capacity	The allocations policy recognises the need for family and social support networks. As such it permits an applicant to select the area they wish to live in. Our Health & Housing process gives priority to those who would benefit from moving closer to family for support, amenities or to alleviate social isolation.
Reduces crime and fear of crime	<p>East Lothian Council will take steps to recover a tenancy if there is clear evidence of a serious breach of our agreement, including antisocial behaviour, by our tenants or someone known to the tenant in the vicinity of the home.</p> <p>The Council can suspend applicants at the point of application to the housing list due to antisocial behaviour.</p> <p>The allocations policy allows a 'sensitive let' allocation to be made – this ensures that the tenant is allocated a property suitable to their needs & one that will positively impact on the stair or immediate area.</p>

<p>Promotes healthier lifestyles including</p> <ul style="list-style-type: none"> • diet and nutrition, • sexual health, • substance misuse • Exercise and physical activity. • Lifeskills 	<p>New Build Programme - There is a strong association between poor housing conditions and poor health. The development of new homes is important in delivering positive health outcomes by improving access to high quality, fit for purpose accommodation. New build property will meet the standards set out by the Scottish Housing Quality Standard (SHQS) & the Energy Efficiency Standard for Social Housing (EESH) – the Council are working towards these standards in their existing stock via its modernisation programmes.</p> <p>Tenancy Support Officers are able to provide advice & support to tenants regarding their diet and nutrition.</p> <p>Our Health & Housing process supports applicants who have issues with substance misuse and who are receiving support from a recognised rehabilitation programme.</p> <p>Adaptations are carried out in our tenant's homes to allow barrier free movement where possible and to prevent them becoming housebound and improve activity.</p> <p>Our starter flat process allows those leaving care to build on their lifeskills in a supported environment prior to being made a permanent offer of housing. We offer Short Scottish Secure Tenancies which aim to support tenants in improving/changing their behaviour or to demonstrate positive progress in their home.</p>
<p>Environmental</p>	
<p>Reduce greenhouse gas (GHG) emissions in East Lothian (including carbon management)</p>	<p>New homes are built to some of the highest technical standards with the introduction of SG Building Standards in 2015. They promote green design and carbon emissions have reduced by 75% compared with 1990 levels</p>
<p>Plan for future climate change</p>	
<p>Pollution: air/ water/ soil/ noise</p>	<p>New property can be built with solar panels in situ, water butts and Sustainable Drainage Systems (SUDS).</p>
<p>Protect coastal and inland waters</p>	
<p>Enhance biodiversity</p>	
<p>Encourage resource efficiency (energy, water, materials and minerals)</p>	<p>It is crucial that steps are taken to minimise any negative impact of development upon the environment and surrounding communities. New home builders recycle upto 77% of construction waste generated by residential developments</p>
<p>Public Safety: Minimise waste generation/ infection control/</p>	

accidental injury /fire risk	
Reduce need to travel / promote sustainable forms or transport	New build developments can be provided with bicycle stores to ensure safe storage of bikes to encourage their use. There are also 'safer routes to school' within new build developments.
Improves the physical environment e.g. housing quality, public and green space	<p>New build homes can sometimes utilise brownfield sites (land that has been previously developed) to meet the needs for new homes whilst protecting the countryside</p> <p>In green field sites the retention and planting of trees and shrubs is widely recognised as an important factor in improving carbon capture.</p> <p>East Lothian Council builds houses around the issues identified in the 'Housing for Varying Needs' standards.</p> <p>There is a need to develop additional affordable housing to support the changing needs of individuals and families at different stages of life</p>
Economic	
Maximises income and /or reduces income inequality	Tenancy Support Officers assist tenants with information on budgeting and in relation to homelessness, with the affordability of rents etc.
Helps young people into positive destinations	<p>Highly energy efficient, new homes have an important role to play in the fight against fuel poverty Energy efficiency – insulation, solar panels etc., which in turn reduce fuel poverty</p> <p>We aim to implement the EESSH standard against the whole of our stock by 2020.</p> <p>We offer digital support and work towards digital inclusion for our tenants.</p>
Supports local business	
Helps people to access jobs (both paid and unpaid)	
Improving literacy and numeracy	
Improves working conditions, including equal pay	
Improves local employment opportunities	

10. Action Plan

Identified negative impact	Mitigating circumstances	Mitigating actions	Timeline	Responsible person

Removal of insecurity points if Private Residential Tenancy Agreement used.	This type of agreement now offers more security to tenants.	Priority points will still apply should they be issued with a Notice to leave by their landlord.	May 2019	James Coutts/Steph Irvine
Review of homelessness applications after 6 months	This is to ensure that all applicants are realistic in their choices and to ensure they maximise their housing options and the Council can discharge their homelessness duty.	The new areas/property types will still meet their assessed needs, family size and main town.	May 2019	James Coutts/Steph Irvine
Taking Home Ownership/ Proceeds of Sale into consideration.	Applications from owner occupiers will be accepted but remain deferred until their circumstances/need for a Council tenancy changes.	Will be dealt with on a case by case basis and the circumstances of each application will be considered.	May 2019	James Coutts/Steph Irvine

11. Sign off by Head of Service

Name

Date

