



**Comhairle nan Eilean Siar  
Equality and Diversity  
Full Impact Assessment Toolkit**

**Local Housing Strategy**

**2017**

## STEP ONE

### Define the Aims of the Policy

<b>Title of Policy</b>	Local Housing Strategy
<b>Department/Section</b>	Development Department
<b>Lead Officer</b>	Isobel MacKenzie
<b>Date of Full Assessment</b>	September 2017

Is this a new or existing policy? (please tick as appropriate)	<b>New</b>		<b>Existing</b>	√
What is the purpose of the proposed policy (or changes to be made to the policy)?	<p>The development of a Local Housing Strategy (LHS) is a statutory requirement in terms of Section 89 of the Housing (Scotland) Act 2001. The LHS 2017-22 was prepared in compliance with Scottish Government guidance on the preparation of a LHS and the preparation of a Housing Need and Demand Assessment (HNDA). It is underpinned by a continuing programme of policy analysis and review.</p> <p>The LHS sets out the priorities of the Comhairle and its partners for achieving our housing outcomes over the 5 year lifespan of the strategy. These priorities have been informed by the HNDA as well as by the responses of stakeholders and local residents to a consultation exercise. As the local authority's principal strategic housing document it covers national and local priorities with respect to housing supply, stock condition and fuel poverty in both the public and private sectors, homelessness prevention and alleviation, and independent living.</p>			
Who is affected by the policy or who is intended to benefit from the proposed policy and how?	<p>The Strategy will potentially affect all households currently living in the Outer Hebrides or who aspire to live there. It will positively affect some groups more than others (e.g. older people, homeless persons, clients with housing support needs) by outlining specific intentions to address their housing needs but it does not adversely discriminate directly or otherwise against any of the Equalities Groups.</p>			
How have you, or will you, put the policy into practice, and who is or will be responsible for delivering it?	<p>The Comhairle has a statutory duty to monitor the LHS and for ensuring its implementation through programmes delivered in co-operation with partner organisations.</p> <p>Local partners include Hebridean Housing Partnership (HHP) and Tighean Innse Gall (TIG). National partners include the Scottish Government and agencies such as the Energy Savings Trust.</p> <p>Ongoing monitoring and review of the LHS is the responsibility of the Housing Services Team and the Communities and Housing Strategic Member Officer Working Group.</p>			

<p>How does the policy fit into our wider or related policy initiatives?</p>	<p>The LHS 2017 -2022 will support the priorities of the Outer Hebrides Community Planning Partnership in relation to Regeneration and Population Retention in rural areas, and the provision of expanded and improved Health and Social Care Services. It is also aligned to the three overarching strategic priorities of the Local Outcomes Improvement Plan and the complementary Corporate Plan:</p> <ol style="list-style-type: none"> <li>1) Sustainable population – the Outer Hebrides retains and attracts people to ensure a sustainable population.</li> <li>2) Sustainable economy – the Outer Hebrides has sustainable economic growth and all our people have access to appropriate employment opportunities.</li> <li>3) Improving quality of life and wellbeing – the Outer Hebrides offer attractive opportunities that improve the quality of life, wellbeing and health for all our people.</li> </ol> <p>The LHS has informed and been informed by the Housing policies within the Local Development Plan and the strategic direction takes account of Scottish Government’s national housing priorities.</p>
<p>Do you have a set budget for this work?</p>	<p>The Housing Service has an annual budget set by the Comhairle, but the implementation of the strategy also depends on accessing a range of external resources including Scottish Government grant funds, the budgets of partner organisations, including HHP and TIG, and contributions from individual households where appropriate.</p>

**STEP TWO**  
**What Do We Know?**

<p><b>What information do you know about the diverse needs and/or experiences of your target audience?</b></p>	
<p>Age</p>	<p>Evidence</p> <p>Housing Needs and Demand Assessment (HNDA) was carried out in line with Scottish Government guidance. It highlighted an ageing demographic and the importance of expanded and improved services delivered in an integrated and holistic way to improve outcomes for older people. The re-provisioning of Residential Care Services in Lewis incorporating Extra Care Housing is a priority within the LHS.</p> <p>The HNDA evidence also showed a population imbalance as a result of younger people leaving the islands due to lack of employment opportunities and the impact of this on accessing housing options. In particular, lower than average income levels and welfare benefit restrictions make it more difficult for some younger households to secure housing solutions for themselves in the mainstream housing system.</p>

## Consultation

Discussions on the content of the Strategy began during consultation on the HNDA in 2016 and continued throughout the LHS process. Regular sessions were held with key stakeholders overseen by the Local Housing Strategy Member Officer Working Group. Additionally, officers of the housing strategy team are members of key professional groupings which afforded ongoing consultation opportunities.

The formal LHS consultation phase ran from January to March 2017 and was conducted using a range of media to ensure engagement with as many local communities, interest groups and individuals as possible and that the composition of the local population was accurately reflected in the process, remembering that some people's views may not be readily heard through using the traditional engagement methods.

Advertisements and information briefings were published in the local press, community newspapers, and the Comhairle web site. A stakeholder survey was made available in hard copy at key community locations as well as on-line.

A series of meetings and workshops, including for Comhairle Members and internal stakeholders, were offered to a mix of community and professional groups, while discussions at existing liaison groups such as the Adult Protection Committee, Alcohol and Drug Partnership and various sub-groups of the Health and Social Care Partnership and programmed partnership meetings ensured the inclusion of external agencies. The consultation sessions were tailored to the remit of each audience and additional detailed discussions with potential partners were held in April and May 2017.

In terms of equalities, members of the Diversity and Equality Steering Group (DESG) were invited to communicate with the groups they represent in order to ascertain any perceived gaps in the proposed strategy in terms of housing supply and/or housing services. Views and experiences on difficulties their members had encountered in accessing housing services were also sought.

Consultation feedback has shaped the LHS priorities in relation to older people. In particular consultation stressed a need to ensure adaptations and other housing support services support the home care re-ablement priorities of the IJB.

	<p>Consultation and good practice evidence has also pointed to a need for housing education in schools, and more tailored information and advice that covers all housing options.</p>
<p>Disability</p>	<p>Evidence</p> <p>The HNDA confirms a continuing and increasing requirement for adaptations, which play an important role in assisting disabled people to live independently in their own home. There may be a significant in demand for bespoke wheelchair housing in the future given demographic trends. The potential for further use of Telehealth and Telecare technologies was identified and it also pointed to a shortfall in supported housing for adults with disabilities - particularly those with learning difficulties.</p>
	<p>Consultation</p> <p>The LHS priorities reflect feedback from the consultation process described above (see under age) and were developed with input from the IJB. The wider consultation process confirmed that the provision of adaptations is an important issue for older households and carers. It also reinforced the need to improve the housing options available to people with disabilities and to maximise the use of assistive technologies.</p> <p>Provision has also been made to ensure the LHS document will be available in different formats for people with particular disabilities.</p>
	<p>Evidence</p> <p>Housing needs and demand experiences generally relate to households which either include both genders or where gender is not relevant. That said, specific issues relating to gender can result from household dissolution.</p>
	<p>Consultation</p> <p>Members of Diversity and Equality Steering Group (DESG) did not identify any specific gender relate housing issues.</p> <p>However, the delivery of the Housing Strategy may have a positive impact on men to the extent that they are at higher risk of becoming homeless because of relationship breakdown and more likely to require support in resettlement. Likewise it will potentially have a positive impact on women to the extent that a large proportion of the population that tend to require an integrated package of housing support and care are older widowed women.</p>

	<p>Evidence</p> <p>The HNDA highlighted the potential risk of discrimination and harassment in terms of service delivery but found no evidence that such problems occur in the Outer Hebrides.</p>
Gender	<p>Consultation</p> <p>Members of DESG did not inform of any specific housing issues in respect of lesbian, gay, bisexual and transgender groups that required a strategy response through the LHS.</p> <p>Priorities to assist older people remain in their home may however promote equality within this category by default. Research has shown that older LGBT people articulate a particularly strong desire to remain in their own homes.</p> <p>Evidence</p> <p>The HNDA reports that in 2011 just under 1% of the Outer Hebrides population were from minority ethnic backgrounds.</p> <p>There have been no specific issues regarding housing provision for them.</p> <p>Within the last year six Syrian Refugee families have been resettled in Stornoway. The families are currently living in self-contained temporary accommodation units and will eventually be allocated their own permanent tenancies.</p> <p>The 2011 Census reported a total of 10 inhabitants of the Outer Hebrides recording their ethnicity as Gypsy Traveller 4 of these were under 15 years of age. These residents are not currently living a Gypsy Traveller lifestyle (and have not been for a significant period). They have made no approach to the Comhairle for services to enable this. Therefore in the absence of any evidence of demand for formal provision of services there remains no justification to provide designated sites.</p>
Lesbian, Gay, Bisexual & Transgender	<p>Consultation</p> <p>Consultations through the DESG and the Western Isles Learning Shop (which provides English language education) did not highlight any specific housing issues but did highlight continued language barriers. Provision has therefore been made to ensure the LHS document can be made available in different languages on request.</p> <p>Evidence</p> <p>Evidence regarding the religion and belief of customers using housing services is not routinely collected.</p>

Race	<p>Consultation</p> <p>Members of DESG did not identify any specific housing issues in respect of religion or belief but there are no obvious areas for concern.</p>
	<p>Evidence</p> <p>The HNDA indicates a high proportion of tenants are on low income, disabled or vulnerable.</p>
Religion and Belief	<p>Consultation</p> <p>Consultation stakeholders included the Community Care Forum which represents a variety of 3<sup>rd</sup> Sector Health and Social Care providers, including the local Carers Network. Feedback confirmed that amongst their clients there remains a widespread concern about the impact of Welfare Reform.</p> <p>The LHS recognises that ongoing work is needed to mitigate the potential effects of this on the equality groups.</p>
Other (e.g. employees, poverty, pregnant women, persons with caring responsibilities, gypsy/travellers)	

### **STEP THREE**

#### **Do you have enough information to help you understand the diverse needs and/or experiences of your target audience?**

Is further information required?	Yes	No	√
If yes, what else do you need to know?			
Is there any further consultation planned or required?	No		

What were the outcomes of the consultation and engagement undertaken?	<p>The consultation process confirmed the following priorities for equalities groups, which are reflected in the strategy document:</p> <ul style="list-style-type: none"> <li>• Need for expansion of both care at home and residential services for older people given demographic trends ,</li> <li>• Need to expand housing options for special needs groups</li> <li>• Need to address fuel poverty across tenures and general housing quality in private sector</li> <li>• Need to maintain increase in affordable housing supply</li> <li>• Wish for the LHS to support wider corporate and CPP priorities re population and health and social care.</li> </ul>
---	--

#### **STEP FOUR**

##### **Identified impacts: List all impacts that have been identified**

Tick as appropriate	Positive	Negative	Neutral
Age	√		
Disability	√		
Gender			√
Lesbian, Gay, Bisexual & Transgender			√
Race			√
Religion and Belief			√
Households affected by Fuel Poverty	√		
Homeless Persons	√		

Age	<p>The LHS describes how the Housing Service will support the IJB to re-provision residential care services in Lewis and introduce an Extra Care Housing element.</p> <p>Adaptations and related services will be maintained to promote independent living in conjunction with other care at home provision.</p> <p>Initiatives will be developed to increase housing options for young people including those with particular needs.</p>
-----	---



Disability	The LHS includes plans to provide additional supported tenancy opportunities for a range of client groups, including through alignment with ongoing work on Mental Health services redesign.
Gender	Not applicable
Lesbian, Gay, Bisexual & Transgender	Not applicable
Race	Not applicable
Religion and Belief	Not applicable
Homeless Households	The LHS describes the Comhairle's plans to prevent homelessness and ensure appropriate assistance to those who do become homeless.
Households affected by Fuel Poverty	The LHS sets out the intention to support national initiatives and to develop or facilitate local initiatives, to alleviate the incidence of fuel poverty amongst Island households.

## **STEP FIVE**

### **Will you be making any changes to your policy?**

Are there any changes?				
Age	Yes	√	No	
Disability	Yes	√	No	
Gender	Yes		No	√
Lesbian, Gay, Bisexual & Transgender	Yes		No	√
Race	Yes		No	√
Religion and Belief	Yes		No	√
Other	Yes		No	√

Please identify:

- what action you will take,
- who will take that action, and
- when that action will be taken

The LHS is a high-level five-year strategy document that provides the framework for more specific activities and is aligned to a National Housing Outcomes Framework and CPP priorities. Many of these activities will be developed in partnership with other agencies, and as such the potential programme of work to be implemented will be subject to resource availability, shifts in Scottish Government policy and the prioritisation of local issues.

The implementation and ongoing monitoring of the LHS is the responsibility of the Communities and Housing Strategic Member Officer Working Group, which will reports on progress and any proposed amendments to the overall strategy to the parent committee on an annual basis. The remit of this group includes responsibility for ensuring no detrimental equalities consequences flow from proposed or adopted changes to the Strategy.

## **STEP SIX**

### **Identified opportunities to promote equality**

How does the policy promote equality of opportunity?	The LHS sets the framework for ensuring all households in the Outer Hebrides live in safe, secure and suitable accommodation according to their preferences. It promotes a range of support types targeted towards those requiring assistance to maximize access to and sustainment of independent living.
How does the policy promote good relations?	Not applicable
Does this policy have the potential to cause unlawful direct or indirect discrimination? Does this policy have the potential to exclude certain group of people from obtaining services, or limit their participation any aspect of public life?	No

**STEP SEVEN**

**Based on the work you have done - rate the level of relevance of your policy**

Tick one box for each strand	Age	Disability	Gender	LGBT	Religion and belief	Race
<b>High</b> - There is substantial evidence that people from different groups or communities are (or could be) differently affected by the policy (positively or negatively) - There is substantial public concern about the policy, or concerns have been raised about the policy's potential impact by relevant bodies - The policy is relevant to all or part of the respective general duty, in the case of race, disability and gender.	√					
<b>Medium</b> - There is some evidence that people from different groups or communities are (or could be) differently affected (positively or negatively). - There is some public concern about the policy. - The policy is relevant to parts of the respective general duty, in the case of race, disability and gender.	√	√				
<b>Low</b> - There is little or no evidence that some people from different groups or communities are (or could be) differently affected (positively or negatively). - There is little or no evidence of public concern about the policy. - The policy has little or no relevance to the respective general duty, in the case of race, disability and gender.			√	√	√	√
<b>Unknown-</b> No evidence or data has been collected therefore an assessment cannot be made.						

## **STEP EIGHT**

### **Monitoring & Evaluation**

<b>Monitoring &amp; Evaluation</b>	
Please explain how monitoring will be undertaken, when it will take place and who is responsible for undertaking it.	A performance measurement framework is an integral part of the LHS, with agreed indicators linked to specific outcomes. The Member/Officer Working Group will meet regularly to assess progress and inform the Comhairle
How will you know what the actual effect of the policy is?	Through monitoring of the agreed indicators and broader feedback from a range of partner organisations and service user groups
In what ways will you monitor?	As explained above, principally by means of regular assessment of progress against the agreed performance indicators
How often will monitoring information be analysed and published?	Annually
When will you review the policy taking into account any monitoring information?	Annually
Date of next review:	December 2018
<b>Publish Assessment Results</b>	
What are the arrangements for providing feedback to those involved in the process?	The LHS document and an Executive Summary will be published on the Comhairle's website ,with notification of this made to the public and to all those who offered comments on the consultation draft.
How will you ensure the wider public knows the outcomes of your impact assessment, consultation and monitoring?	Results will be published in the form of briefing papers and reports to the Comhairle.
How will you ensure access to the full impact assessment report?	Comhairle papers are published on the internet.

## **Sign off and Authorisation**

You should have completed the following steps:

Impact Assessment Steps 1-8	Yes	No
1. Defined the aims of your policy	√	
2. Identified what we already know (i.e. what does the existing evidence base tell us?)	√	
3. Identified what more we need to know (i.e. what gaps have we identified in our evidence base?)	√	
4. Analysed the evidence (i.e. what does this all mean in relation to our policies?)	√	
5. Considered any necessary changes & identified action (i.e. will you be taking action to make any changes? If yes, what, when and who? If not, what are your reasons for not taking any action?)	√	
6. Identified opportunities to promote equality	√	
7. Measured differential impact	√	
8. Outlined arrangements for monitoring & evaluation	√	

## **Authorisation**

Policy Title	Local Housing Strategy
Department/Section	Development Department
We have completed the equality impact assessment for this policy.	Name: Isobel MacKenzie Position: Housing Strategy and Development Officer Date: September 2017
Authorisation by Director or equivalent	Name: Calum Iain Maciver Position: Director of Development Date: September 2017