## Equality Impact Assessment:

**Purpose of the Equality Impact Assessment:**

The Equality Act 2010 introduced a [Public Sector Equality Duty](http://www.equalityhumanrights.com/uploaded_files/Scotland/PSED_in_Scotland/essential_guide_to_the_psed.doc) (PSED) requiring public bodies to give due regard to the need to:

* Eliminate unlawful discrimination
* Advance equality of opportunity
* Foster good relations

Consideration must be given to the protected characteristics covered by the Equality Act. Assessments should ‘consider relevant evidence relating to persons with protected characteristics in relation to assessments of impact’.

The purpose of an Equality Impact Assessment (EQIA) is to ensure that policies, functions, plans or decisions (hereafter referred to as ‘policy’) do not create unnecessary barriers for people protected under the Act. Where negative impacts are identified these should be eliminated or minimised, and opportunities for positive impact should be maximised.

Screening is a short exercise to determine if a policy is relevant to equality and whether a full equality impact assessment (EQIA) should be carried out.

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| Title/description of the policy | **Local Housing Strategy** | |
| Name of the person(s) carrying out the assessment? | Shirley MacKenzie, Housing Policy Officer  Rosemary MacKinnon, Principal Policy Officer - Equality | |
| Service and Department | Community Services / Chief Executives | |
| Date of assessment | 1 October 2017 | |
| What are the aims and objectives of the policy/function/strategy? | | |
| The Highland Housing Strategy sets out our aims for housing over the next 5 years and what we will do to:   * Increase the supply of homes in Highland so that we have enough houses in the right places to meet housing needs. * Support people to live independently for as long as possible in their own homes and communities. * Prevent and respond to homelessness and make sure people have the right help to let them make decisions on their housing options. * Improve the condition of housing and minimise fuel poverty to improve the quality, comfort and affordability of homes.   The Local Housing Strategy also has a clear contribution to make to support the delivery of the Highland Local Outcome Improvement Plan and to reduce inequalities. It is also likely to support the delivery of local priorities as set out in the Locality Plans as they are developed.  The Strategy is delivered through a range of supporting Housing Policies ( eg Allocations, Homelessness, Adaptations) and which have been assessed for equality impact. | | |
| Who may be affected by the policy | 1. Those who live in or who want to live in the Highland Council Area. 2. People whose current housing does not meet their needs. 3. People living in poor quality or substandard housing. 4. People who are homeless or at risk of homelessness. | |
| How have stakeholders been involved in the development of the policy? | 1. Discussion with stakeholders through Housing Strategy Group 2. Public consultation through a series of drop in sessions and via Council website. | |
| *Which parts of the public sector duty is the policy relevant to?* | | |
| 1. Eliminate unlawful discrimination | ✓ | To ensure no unfair treatment in respect of Housing Strategy aims |
| 1. Advance equality | ✓ | Opportunities to promote and advance equality |
| 1. Promote good relations | ✓ | Housing is a key area in respect of working with communities |

***Screening: Which of the protected characteristics is the policy relevant to?*** *Tick and briefly describe any likely equalities impact (positive/negative/neutral).*

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| **Characteristic** | **Positive** | **Negative** | **Neutral** | **comments** |
| Gender | ✓ |  |  | Role of Housing in tackling domestic abuse/Violence Against Women |
| Age | ✓ |  |  | Highland has an aging population.  Particular housing needs of young people. |
| Disability | ✓ |  |  | Need for accessible/ adaptable housing and appropriate accommodation to meet needs of disabled people. |
| Religion Belief |  |  | ✓ | No evidence of specific impact |
| Race | ✓ |  |  | Gypsy/Traveller accommodation |
| Sexual Orientation |  |  | ✓ | No evidence of specific impact |
| Gender reassignment |  |  | ✓ | No evidence of specific impact |
| Pregnancy/maternity |  |  | ✓ | No evidence of specific impact |
| Marriage and Civil Partnership\* |  |  |  | N/A |

\*applies only to Employment and the duty to give regard to the elimination of discrimination

**Recommend this policy for full Equality Impact Assessment?**

**Yes**

If the answer is “Yes”, continue to the next section. If the answer is "No", please give brief reasons here.

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**Equality impact Assessment:**

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| **Evidence and consultation** | |
| What existing sources of information have you gathered to help identify how people covered by the protected characteristics may be affected by this policy or service?  Eg Consultations, national or local data and/or research, complaints or customer feedback. Are there gaps in available data? | |
| ***Data:*** *Extensive research undertaken on housing need and demand as the basis for the strategy. This includes demographic data (Census 2011); Scottish Household Survey, Housing Need and Demand Assessment 2015; Socio-economic data (SIMD, SEP), SG Equality Evidence Finder*  *Key equality data for Highland includes:*   * *51% of the Highland population is female and 49% is male, compared to 52% and 48% respectively for Scotland* * *Highland generally has an older population profile than that of Scotland as a whole with a slightly higher percentage of children. Older people in Highland are most likely to be in fuel poverty (74% compared to 49% nationally). There is evidence that young people in Highland ‘drift’ away from rural areas to find improved job or education prospects.* * *The minority ethnic population of Highland is 1.4% (up from 0.8% in 2001) compared to 4% for Scotland overall.* * *Most people in Highland describe their ethnic background as ‘White’. In Highland, a larger percentage describes themselves as ‘White: Other British’ (15% in Highland versus 8% in Scotland). Proportions of people from different ethnic origins are similar across all Highland Housing Market Areas. Highland has a higher than average Polish population (1.48% compared to 1.16%) and a higher than average Gypsy/Traveller population (0.13% compared to 0.08%).* * *Highland is dependent on inward migration for population growth, and without positive inward migration we will see the population begin to decline at an increasing rate.* * *According to the Scottish Household Survey, 21% of people in Highland have a long-standing limited illness (LTLI), health problem or disability compared to 18% in Scotland. LTLI increases with age, with 59% of men and 66% of women over the age of 75 having a LTLI compared to 8% of men and 7% of women under 30. In Scotland, social renters are more likely to have a limiting, long-term physical or mental health condition (39%) than any other tenure and the population as a whole (23%). As at July 2017 there were 547 people in Highland receiving a long term housing support service in Highland. Most services are centred on clients with Learning Difficulties (43%) or Mental Health conditions*.   *There are gaps in available data, in particular, the Council has limited reliable data on many protected characteristics for our tenants or those on the housing register. This makes it harder to identify patterns or where people with protected characteristics may be over or under represented.*  ***Consultation:*** *There was wide stakeholder involvement in preparing the draft strategy reported to Committee in January 2017* [*(Item 8 Local Housing Strategy*](https://www.highland.gov.uk/download/meetings/id/71643/item_8_local_housing_strategy)*). This was carried out jointly through the development plan consultation process. We consulted widely on the Highland Local Development Plan and the main issues for Local Housing Strategy in a series of public events during September to November 2015. This provided information on the key issues to be addressed by the strategy.*  *Following finalisation of the draft strategy, further on-line consultation took place* | |
| **Impact**  a) Describe any evidence of, or potential for, negative impact  and/or  b) Does the policy contribute positively to the promotion of equality on any particular group | |
| Gender: | Domestic abuse tends to be an issue faced mainly by women, and the strategy covers specialist accommodation provided through Women’s Aid.  Our homelessness and housing allocation policies are designed to ensure that there is no gender inequality in the delivery of housing services. |
| Age: | Older People  The Local Housing Strategy highlights demographic trends that will result in an aging population. We need to plan for long term needs to ensure this group is not disadvantaged in terms of access to suitable housing and the actions contained in the strategy aim to address the housing needs arising from this.  Many people will be able to live at home for longer and there will be an increasing need for suitable accessible accommodation and associated support services (links to increased prevalence of disability and ill-health with age), including for people in the oldest age groups (75+). A significant proportion of the elderly population is likely to live alone, bringing a particular set of challenges in terms of housing and care.  Older people are more likely to experience fuel poverty  Younger People  The strategy recognises that younger people are more likely to be at risk of homelessness, that they have more difficulty accessing housing and live in Houses of Multiple Occupation and that housing may be unaffordable for them.  We also recognise the need for multi-agency working, including specialist accommodation for young people with specialist needs.  Recent profiling of HC tenants shows that **5%** of tenants are in the 16-24 age group.  However, if you look at tenancy sustainment in this group:   * 10% of transfer applicants who do not sustain their tenancies are aged 16-24 * 15% of homeless applicants who do not sustain their tenancies are aged 16-24 * 24% of housing list tenants who do not sustain their tenancies are aged 16-24 * 10% of the “other” category who do not sustain their tenancies are aged 16-24   The group identified overall as not sustaining tenancies are those from the housing list – and a disproportionate number of these are in the 16-24 age bracket.  A working group is being set up to look at tenancy sustainment issues and these issues will be addressed through this. A tenancy sustainment policy is being developed and an equality impact assessment will be carried out as part of the development process. |
| Disability: | The Local Housing Strategy recognises the needs of disabled people and aims to ensure that people are able to live in appropriate housing that meets their needs. As noted above, there are links to an aging population but there are also identified housing requirements of young people with complex needs.  We need to make sure that disabled people are able to stay in their own homes or access accommodation that will meet their needs. There is evidence of the need for accessible / adapted property, with a particular need for ground floor / level access housing.  We do this by prioritising expenditure on equipment and adaptations, telecare services and care at home through NHS Highland, so that people can remain in their own homes for as long as possible, where this is their preferences.  There is recognition that Housing Support is less likely to be available in rural areas.  There appears to be a significant increase in households experiencing homelessness who also have mental health issues (from 38 in 2013/14 to 111 in 2016/17).  All new housing is built to housing for varying needs standards and we use our new build programme to meet specific housing needs where we cannot do this by adaptations within existing housing. |
| Religion or belief: | Housing policies supporting this strategy have all had equality impact assessments carried out, as far as possible negative impact will have been addressed at that time. No specific issues are identified for religion or belief. |
| Race: | We monitor housing applications and outcomes from ethnic groups. Aside from Gypsy/Travellers there are no specific issues identified for minority ethnic groups. Housing policies supporting this strategy have all had equality impact assessments carried out, as far as possible negative impact will have been addressed at that time  The Local Housing Strategy is based on an accommodation needs assessment for Gypsy/Travellers.  Gypsy/Travellers have significantly poorer health outcomes and lower life expectancy than the national average. We work closely with partners in NHS Highland and with the Council’s Care and Learning Service to improve health and education outcomes for Gypsy / Traveller households in Highland. |
| Sexual Orientation: | Housing policies supporting this strategy have all had equality impact assessments carried out, as far as possible negative impact will have been addressed at that time. No specific issues identified for sexual orientation. |
| Gender reassignment: | Housing policies supporting this strategy have all had equality impact assessments carried out, as far as possible negative impact will have been addressed at that time. No specific issues are identified for gender reassignment. |
| Pregnancy/maternity: | Housing policies supporting this strategy have all had equality impact assessments carried out, as far as possible negative impact will have been addressed at that time. No specific issues are identified for pregnancy/maternity. |
| Marriage and civil partnership: | Housing policies supporting this strategy have all had equality impact assessments carried out, as far as possible negative impact will have been addressed at that time. No specific issues are identified for marriage and civil partnership. |
| **Justification** | |
| If negative impact is identified, can this be justified? | No negative impacts have been identified |
| **Mitigation** | |
| Can the potential for negative impact on particular groups be removed or minimised? | The Local Housing Strategy aims to identify and ensure actions are taken to address potential negative impacts as set out above. |
| **Actions** | |
| Are there actions identified to advance or promote equality, or to mitigate potentially negative impact? Please detail or attach an action plan. | |
| Gender   * Continue to contribute to effective multiagency work to tackle and respond to the housing needs arising in relation to domestic abuse.   Older People   * Prioritise services which encourage and enable people to plan and make well informed choices about their future housing needs. * Increase the use of technology enabled care and flexible housing design innovations in support of preventative and anticipatory approaches to housing provision. * Collaborate with NHS Highland and other partners to develop appropriate intermediate housing options. * Continue to prioritise home based support services provided by joint Handyperson and Care and Repair providers delivering adaptations, equipment, telecare and small repairs services across tenures. * Continue to work in partnership with other agencies to develop solutions on how to address fuel poverty in remote and rural areas.   Younger People   * Prioritise services which encourage and enable people to plan and make well informed choices about their future housing needs. * Work closely with the Highland Joint Transitions Team to identify and plan for the future accessible housing needs of young adults in Highland to enable them to live independent lives with access to the same opportunities as other young people. * Provide support to enable people to develop and maintain their capacity to live independently. * Ensure that housing support services focus on achieving positive outcomes and sustainable solutions for clients. * Continue to implement a protocol on accommodation for looked after children to prevent homelessness.   Disability   * Increase the supply, and test innovative approaches to specialist housing: for example the FIT homes pilot. * Redesign and improve housing adaptations services to a tenure neutral, integrated, person centred model. * Collaborate with NHS Highland and other partners to develop appropriate intermediate housing options. * Continue to prioritise home based support services provided by joint Handyperson and Care and Repair providers delivering adaptations, equipment, telecare and small repairs services across tenures, as a result of shifting the balance of care.   Race   * Consider further Gypsy / Traveller Site provision where needs are identified. | |

Please provide details of arrangements to monitor and review the policy and any mitigating actions or actions to promote equality.

**The strategy will be reviewed annually.**

**Supporting policies will be reviewed regularly and assessed for equality impact.**

Please state where the EQIA will be published:

**The assessment will be published on the Council website.**

**Equality Impact Assessment Sign off: For completion by Director or Head of Service**

1. Please check if you are satisfied that the following elements of the EQIA have been considered:

Gathering information  
Consultation and involvement  
Assessing impact for all protected characteristics  
Mitigating actions identified (if required)  
Opportunity to promote equality  
Arrangements to monitor and review  
Publication arrangements

2. a) Are you prepared to sign off the EQIA? YES e NO

b) If "NO" provide details of why and next steps

Name: David Goldie

Position: Head of Housing and Building Maintenance

Date: 30 November 2017