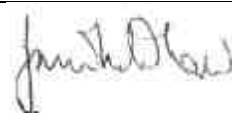


Integrated Relevance Assessment Form

1. Details of proposal	
Policy Title (include budget reference number if applicable)	West Lothian Local Housing Strategy 2023-2028
Service Area (detail which service area and section this relates to)	Corporate – Housing Customer & Building Services
Lead Officer (Name and job title)	Gillian Edwards, Planning & Coordination Officer
Other Officers/Partners involved (list names, job titles and organisations if applicable)	Gillian Edwards
Date relevance assessed	April 2023
2. Does the council have control over how this policy will be implemented?	
YES	Yes <input type="checkbox"/> NO <input type="checkbox"/>
<p>3. The General Duty of the Equality Act 2010 requires public authorities, in the exercise of their functions, to have due regard to the need to:</p> <ul style="list-style-type: none"> • Eliminate unlawful discrimination, harassment and victimisation and other prohibited conduct • Advance equality of opportunity between those who share a protected characteristic and those who do not; and • Foster good relations between those who share a protected characteristic and those who do not <p>NB: In this section you must also consider the Human Rights Act and the key PANEL (Participation, Accountability, Non-Discrimination, Empowerment and Legality) principles of Human Rights – (further detail on what these are, are provided in the guidance document)</p> <p>Which groups of people do you think will be, or potentially could be, impacted upon by the implementation of this policy? You should consider employees, clients, customers and service users (Please tick below as appropriate)</p>	
Age - Older people, young people and children	<input checked="" type="checkbox"/>
Disability - people with disabilities/long standing conditions	<input checked="" type="checkbox"/>
Gender reassignment - Trans/Transgender Identity – anybody who’s gender identity or gender expression is different to the sex assigned to them at birth	<input checked="" type="checkbox"/>
Marriage or Civil Partnership – people who are married or in a civil partnership	<input checked="" type="checkbox"/>

Pregnancy and Maternity – woman who are pregnant and/or on maternity leave	x
Race - people from black, Asian and minority ethnic communities and different racial backgrounds	√
Religion or Belief – people with different religions and beliefs including those with no beliefs	√
Sex - Gender Identity - women and men (girls and boys) and those who self-identify their gender	x
Sexual Orientation – lesbian, gay, bisexual, heterosexual/straight	x
4. Do you have evidence or reason to believe that this policy will or may impact on socio-economic inequalities? Consideration must be given particularly to children and families	
Socio-economic Disadvantage	Impact – please tick below as appropriate)
Low Income/Income Poverty – cannot afford to maintain regular payments such as bills, food, clothing	√
Low and/or no wealth – enough money to meet basic living costs and pay bills but have no savings to deal with any unexpected spends and no provision for the future	√
Material Deprivation – being unable to access basic goods and services i.e. financial products like life insurance, repair/replace broken electrical goods, warm home, leisure and hobbies	√
Area Deprivation – where you live (rural areas), where you work (accessibility of transport)	√
Socioeconomic Background – social class i.e. parents education, employment and income	X
5. Integrated impact assessment required? (Two ticks (√) above = full assessment necessary)	
YES	√
NO	
6. Decision rationale – if you have ticked no above, use this section to evidence why a full IIA is not required	
Signed by Lead Officer	<i>Gillian Edwards</i>
Designation	Planning & Coordination Officer
Date	01/05/2023
Counter Signature (Head of Service or Depute Chief Executive responsible for the policy)	
Date	07/06/2023

- **No assessment required – process ends**
- **Include** a detailed summary of the decision rationale in any council reports and include a copy of the IRA with the background papers.
- **Full Assessment required – continue to Full Assessment Form**

Full Integrated Impact Assessment Form

1. Details of proposal West Lothian Local Housing Strategy 2023-2028	
Details of others involved	Officers, Tenants and RSL partners
Date assessment conducted	April 2023
2. Set out a clear understanding of the purpose of the policy being developed or reviewed (what are the aims, objectives and intended outcomes) including the context within which it will operate.	
<p>The Housing Scotland Act 2001 requires that all Local Authorities submit a Local Housing Strategy every five years. The Local Housing Strategy is the key strategic document for housing and covers all tenures. It spans a wide range of policy areas which impact on a broad spectrum of the community. An EQUIA is necessary as individual groups may be potentially adversely or positively affected by aspects of the strategy.</p> <p>The content and structure of the LHS is set out in guidance provided by the Scottish Government in the Local Housing Strategy Guidance issued in 2019. The Housing (Scotland) Act 2001 places a statutory requirement on local authorities to produce an LHS which sets out its strategy, key development priorities and how the council plans for the delivery of housing and related services. The LHS reinforces the council as the strategic housing authority and sets how investment priorities will be delivered council-wide. It also informs the Scottish Government and other stakeholders of the housing investment decisions made by the council.</p> <p>The strategy sets out how investment in housing and related services will be delivered over a five year period to achieve outcomes in the following areas:</p> <ul style="list-style-type: none"> • Housing Delivery • Private Rented Sector • Place Making and Communities • Preventing and Addressing Homelessness • Specialist Provision and Health and Social Care Integration • Climate Change, Energy Efficiency and Fuel Poverty • House Condition <p>The LHS is developed in consultation with key stakeholders. These stakeholders include other departments in WLC, RSL partners, members of the public and the council's own tenants.</p> <p>All of these key priorities are underpinned by the council's strategic and policy commitments on equalities of opportunities for the people of West Lothian.</p>	

The proposed LHS outcomes that are listed below have been developed in consultation and in line with the priorities identified.

- Working in partnership we will increase affordable housing supply in West Lothian between 2023/24 and 2027/28;
- The private sector in West Lothian provides good quality housing options for people;
- Our Communities are great places to live and work;
- Homelessness is addressed through a focus on early intervention, prevention and housing options;
- Housing responses for specialist housing provision will be determined based on need;
- Through partnership working, the impact of Climate change in West Lothian is mitigated in line with the West Lothian Climate Change Strategy;
- New build council housing will move towards net zero over the duration of the Local Housing Strategy;
- The number of households in fuel poverty will be minimised; and
- House condition will be improved in the social rented sector through the requirement to meet statutory obligations.

3. Please outline any needs and/or barriers which equality groups (People with Protected Characteristics) may have in relation to this policy

Age

What effect/difference will the policy have on people It should have a positive impact on older people providing more choice of housing that will meet their needs.

The housing needs of older people are addressed in the LHS and through work being done on the IJB Strategic Plan. The aim is to enable people to live in their homes for as long as they are able to do so with the support they need.

Part of this support will include provision of housing that is accessible, including wheelchair accessible. Housing specifically for over 55s is being proposed by RSLs through the Strategic Housing Investment Plan.

Private sector housing providers will be encouraged to provide a broader range of house types and sizes to meet the needs of the community.

There is an ongoing commitment from WLC and RSLs to provide adaptations to homeowners, WLC tenants and RSL tenants to enable people to live in their homes should their needs change due to disability.

There is specific consideration of the needs of young homeless people as evidenced by the council's commitment to develop housing for that group as well as the work of other providers such as the Rock Trust and Open Door.

How do you know that?

Increasing the number of accessible homes should impact positively on older people. The provision of the Home First service by Social Policy will enable people to receive support in their homes and housing should be provided that is appropriate to that level of care & support.

West Lothian has one of the highest levels of youth homelessness in Scotland. Providing homes and support for young people will assist in meeting an identified need for housing for this group in West Lothian.

<p>Disability</p>	<p>What effect/difference will the policy have on people? Provision of affordable homes for people with disabilities is a key objective of the Local Housing Strategy and aligns with proposals by both the council and RSLs as included in the Strategic Housing Investment Plan.</p> <p>Sites have been identified for people with disability including learning disability and physical disability. This should have a positive impact and create greater choice of accommodation. It is estimated that around 300 homes could be built for people with particular needs over the next 5 years.</p>
<p>Gender Reassignment – Trans/Transgender Identity</p>	<p>What effect/difference will the policy have on people? We do not consider there to be specific gender reassignment equality impacts that apply to the West Lothian Local Housing Strategy.</p> <p>How do you know that? There is an ongoing commitment from WLC and RSLs to provide adaptations to homeowners, WLC tenants and RSL tenants to enable people to live in their homes should their needs change due to disability.</p> <p>The council’s website includes an accessibility facility to assist those with hearing, sight, dyslexia impediments as well as the opportunity to translate documents, including the LHS on request.</p>
<p>Marriage or Civil Partnership</p>	<p>What effect/difference will the policy have on people? No effects on this group over and above any other..</p> <p>How do you know that? There are no specific marriage or equality issues that apply to the LHS.</p>
<p>Pregnancy and Maternity</p>	<p>What effect/difference will the policy have on people? The provision of a range of house types to meet housing need is a key theme of the LHS and this is relevant to the provision of family housing.</p>

	<p>How do you know that? Access to housing that is provided through the Common Housing Register is subject to the council Allocation Policy and to those of RSLs, all of which are regulated by the Scottish Government and which are themselves subject to relevant equalities legislation and good practice. Housing need and demand for family housing is taken into account on all sites when planning new affordable housing.</p>
Race	<p>What effect/difference will the policy have on people? In planning for new housing, the council and its partners have and will continue to take account of issues relating to ethnic minorities. These include particular demand issues, such as household size and age distribution as well as accessibility for these groups where language and communication may be an issue. The council and RSL partners are committed to providing housing and support for asylum seekers and refugees.</p>
	<p>How do you know that? The Allocation Policy, which was approved in 2020 has been Equality Impact Assessed to ensure that no particularly minority group is disadvantaged through the delivery of the new Council Housing. Support has been provided to asylum seekers and refugees by both RSLs and the council. This is evidenced by recent provision by an RSL partner for Ukrainian resettlement and previously by WLC and RSL partners for Syrian refugees.</p>
Religion or Belief	<p>What effect/difference will the policy have on people? There are no specific religion or belief, equality issues that apply to the Local Housing Strategy.</p>
	<p>How do you know that? Access to housing that is provided through the LHS will be subject to the West Lothian Council Allocation Policy and to those of RSLs, all of which are regulated by the Scottish Government and which are themselves subject to relevant equalities legislation and good practice</p>
Sex	<p>What effect/difference will the policy have on people? There are no specific sex equality issues that apply to the Local Housing Strategy</p>
	<p>How do you know that? Access to housing that is provided through the LHS will be subject to the Allocation Policy and to those of RSLs, all of which are regulated by the Scottish Government and which are themselves subject to relevant equalities legislation and good practice</p>
Sexual Orientation	<p>What effect/difference will the policy have on people? There are no specific sexual orientation equality issues that apply to the LHS</p>

	<p>How do you know that? Access to housing that is provided will be subject to allocations policies developed by RSLs and the Council all of which are themselves subject to relevant equalities legislation.</p>
<p>4. Please outline any needs and/or barriers which may affect vulnerable groups falling into poverty and disadvantage in relation to this policy</p> <p>Vulnerable groups may include the following;</p>	
<ul style="list-style-type: none"> • Unemployed • Single parents and vulnerable families • People on benefits • Those involved in the criminal justice system • People in the most deprived communities (bottom 20 SIMD areas) • People who live in rural areas • pensioners • Looked After Children • Carers including young carers • People misusing services • Others e.g. veterans, students • Single adult households • People who have experienced the asylum system • Those leaving the care setting including children and young people and those with illness • Homeless people • People with low literacy/numeracy • People with lower educational qualifications • People in low paid work • People with one or more Protected Characteristic 	
<p>What effect/difference will the policy have on people?</p> <p>The provision of affordable housing should have a positive impact on all groups listed. Additional housing supply will mean that people who are facing poverty or disadvantage will have the opportunity to access new housing. The housing will be energy efficient in order to reduce the impact of fuel poverty.</p> <p>Access to housing that is provided by the council and Registered Social Landlords will be subject to allocations policies developed by RSLs and the council all of which are themselves subject to relevant equalities legislation.</p> <p>There are 35 datazones in West Lothian in the 20% most deprived areas. New affordable housing sites are mostly located in the main settlements of West Lothian or in the CDAs to ensure connectivity and access to amenities including public transport.</p> <p>The provision of smaller houses may be cheaper to heat and also assist people to down size and free up larger homes. However, there will also be a need for housing for larger families and it is important to consider affordability for this group too.</p> <p>There will be ongoing links with the anti-poverty strategy and Community Wealth Building to ensure that the LHS aligns with anti-poverty aims and objectives.</p> <p>Access to more affordable housing should assist in addressing homelessness and improve status for some people. Affordable housing is integrated into new build private housing through implementation of the Affordable Housing Policy.</p> <p>Provision of gardens or allotments may assist in providing healthy food options for people.</p> <p>Consideration given to Place Making through site selection and planning application. Good quality open spaces can encourage physical activity. Life skills may be enhanced if developers can take on a local workforce and provide training.</p> <p>Wellbeing and mental health should be improved by a better environment.</p>	

How do you know that?

Affordability is a key criteria when determining rent levels for social rent. The council and RSLs undertake affordability assessments with new tenants to ensure they understand the costs involved in housing. Referrals will be made to agencies to ensure prospective tenants can access the relevant benefits. Some RSLs also provide starter packs for people who have been homeless. New build homes are required to have high standards of energy efficiency which means that they should be more affordable to heat.

Moving towards more energy efficient housing for the social rented sector should enable greater affordability for tenants in relation to energy bills. With a commitment to net-zero for future new build, there should be a reduced impact on the environment.

As part of the placemaking strategy, greater consideration will be given to accessibility of housing sites including access to public transport.

5. Action Plan**What action/s will be taken, by whom and what is the timescale for completion****Actioner Name**

Gillian Edwards

Action Date

Annual review of the LHS

What is the issue?

There will be a need for ongoing monitoring of the Local Housing Strategy to ensure that the key actions on each of the themes are undertaken. The actions identified include some that are specifically themed round equalities

- In conjunction with RSL partners, and with support from Scottish Government we will deliver new affordable homes
- We will continue to work closely with colleagues in Health and Social Policy and RSL partners to deliver housing options suitable for people with a range of needs;
- We will aim to meet the requirements of EESSH2 by 2032, with all council homes meeting band D energy efficiency standard by 2025; This will impact on people at risk of fuel poverty
- We will ensure all future new build council houses have heating systems which produce zero direct emissions at the point of use or will have a low carbon alternative;
- We will review the stock condition of WLC housing and consider investment priorities; and
- Our RSL partners will continue investment in their housing stock to meet statutory requirements.

What action will be taken

Reporting on the LHS actions to Housing Services PDSP annually.

Cross referencing reports on all the main strategies and plans are captured that are related to housing activity. This will include the LOIP, the RRTP, the SHIP, the LDP and the IJB Strategic Plan.

There will be ongoing engagement with groups to support the development of the LHS. This will include the Tenants' Panel, Disability West Lothian and Homes for West Lothian Partnership.

Progress against action**Action completed****Date completed**

6. Details of consultation and involvement**Who will be or has been involved in the consultation process**

- a. State which groups are involved in this process and describe their involvement.**
- b. Describe any planned involvement saying when this will take place and who is responsible for managing the involvement process.**
- c. Describe the results of the involvement and how you have taken this into account.**

The draft version of the Local Housing Strategy was made available on the Council's website for consultation from April to June 2022. There were over 600 responses. A link was also available through the Council's Facebook page and Twitter, and comments were encouraged.

Comments were received from a range of individuals, organisations and groups. The majority of comments were supportive of the outcomes identified in the Local Housing Strategy. Consultation has also been undertaken with:

- West Lothian Tenants' Panel
- Council Teams - Social Policy, Finance and Property Services, Operational Services, Corporate Services, Education Services, Planning and Economic Development
- The Advice Shop
- RSL partners
- Homes for West Lothian Partnership
- Community Councils
- Disability West Lothian
- Race Equality Forum
- NHS Lothian
- Other Local Authorities
- Integration Joint Board
- Private Developers
- Scottish Government
- Voluntary Sector Gateway

The feedback received through meetings has informed the LHS to consider the key actions from an equalities perspective. This is demonstrated through consideration of development of affordable housing that meets the needs of a wide range of households. That the housing provided aims to be affordable and that consideration is given to energy efficiency both in new and existing homes. There is opportunity for ongoing engagement with a wider range of organisations and groups. The role of the voluntary sector is likely to become more important over the course of the LHS and an emphasis on a collaborative approach will be required to deliver the key actions and outcomes.

There is a need for further engagement with Gypsy/Travellers on their housing options. This will be addressed over the duration of the LHS.

7. Data and Information

What equality data, poverty data, research, information or other evidence has been used to inform this assessment?

(Information can include, for example, surveys, databases, focus groups, in-depth interviews, pilot projects, reviews of complaints made, user feedback, academic publications and consultants' reports)

- a. **What information or other evidence has been used in the development of the policy?**
- b. **What does research, consultation and other data or information tell you about the impact of the policy? (Describe the information and the conclusions, and state where the information can be found).**
 - (i) **Quantitative (numbers, percentages, statistical data)**
 - (ii) **Qualitative – (written/spoken words, opinions, surveys)**
- c. **Describe any gaps in the available information, and record within section five (Action Plan Section), action you are taking in relation to this (e.g. new research, further analysis) and when this is planned.**
- d. **Give details of any existing local or national evidence which has been used to inform the development of your policy.**

The LHS is informed by the West Lothian Local Development Plan, the new Local Outcomes Improvement Plan, the new IJB Strategic Plan, New Corporate Plan, the Asset Management Plan, the RRTP, the South East Scotland Housing Need and Demand Assessment 2022 and Scottish Government LHS guidance. There is consistency in regard to the proposed objectives of the LOIP, the LHS and the RRTP.

Housing Delivery

Scottish Government has set a target of 110,000 affordable homes between 2022 and 2032. Of these 70% are to be for social rent. An affordable housing supply target of 3000 homes between 2022 and 2032 has been set by the current council administration.

Tenants are consulted on a regular basis in relation to new build council housing and discuss house types and sites. Feedback on current new build council housing is received from tenants who live in the new homes. This informs future housing development in terms of size, layout, house type and location of homes.

A survey was undertaken in April 2022 to inform the LHS and from that the key themes were identified. There has been involvement from the Disability West Lothian in relation to examining new build council housing specifically for wheelchair users. This will inform future housing design.

Specialist Provision and Health & Social Care Integration

There has been consultation with Social Policy in relation to the housing requirements for people with learning disability. A need for specialist accommodation for people with learning disabilities has been identified and this is due for completion in March 2023. Work is ongoing to identify the requirements of other client groups that require specialist housing in conjunction with Social Policy and the Integration Joint Board. There is further work required to ascertain the needs of people coming out of hospital to meet the objectives of "Coming Home".

The accommodation options of Gypsy/Travellers will be further investigated over the duration of the LHS.

There has been ongoing consultation with a range of groups that support people with particular needs. This has helped to gain an understanding of a range of ways to improve the housing of people with disabilities including use of specialist equipment. A new programme of council house building will provide housing to meet a range of needs and RSLs will be encouraged to provide housing that will also meet the needs of a range of households.

Preventing and Addressing Homelessness

There is a proposal to build housing for young people to enable them to gain the skills they need to sustain tenancies. There is high demand for both smaller and larger properties and this will be considered in discussion with RSL partners when developing the housing mix for sites. Developers will be encouraged to provide a broader range of house types to meet the needs of the community.

Placemaking

Through engagement with Public Health Scotland representatives and the Planning Team, there has been consideration of placemaking principles with the aim of increasing collaborative working to ensure that sustainable places are developed. Future projects identified by RSLs include more than 300 properties for specialist accommodation including those for older/ambulant disabled people.

RSLs will provide a greater proportion of affordable housing over the duration of the new LHS with housing being built in a number of communities. More housing will be built alongside private sector development as there is a greater reliance on sites coming forward through the affordable housing policy. It will be important to ensure that the affordable and private housing is integrated as far as possible. As part of the next Local Development Plan, consideration will be given to reviewing the Affordable Housing Policy with a view to encouraging a wider range of house types and sizes to be built on sites.

House Condition

The commitment to improving housing condition in the Social Rented sector to meet statutory standards will mean that homes are more energy efficient. Further standards may be applied to private sector housing in the future as building regulations change.

8. Mitigating Actions

If the policy has a negative/adverse impact on a particular group/s, but is still to be implemented, please provide justification for this.

Note: If the policy is unlawfully discriminatory under the Equality Act 2010 and/or is having a negative impact on poverty and socioeconomic disadvantage under the Fairer Scotland Duty, you MUST identify, how the policy can be amended or justified so the Council acts lawfully.

- a. **How could you modify the policy to eliminate discrimination or to reduce any identified negative impacts? If necessary, consider other ways in which you could meet the aims and objectives.**
- b. **How could you modify the policy to create or maximise the positive aspects of the proposals and to increase equality and reduce poverty and socioeconomic disadvantage.**
- c. **Describe any modifications which you can make without further delay (for example, easy, few resource implications).**
- d. **If you propose to make any of the modifications shown above, describe any potential new negative impacts on other groups in society or on the ability to achieve the aims and how you will minimise these.**
- e. **Please describe the resource implications of any proposed modifications taking into account financial, people and property issues.**

There are significant resource challenges in meeting the outcomes of the LHS.

- Inflationary pressures on the provision of new build housing
- Higher borrowing costs
- High costs of improving existing homes
- Increase in energy costs meaning more people will be at risk of fuel poverty

The council and its partners will aim to address these challenges through collaborative working, ensuring that projects are delivered that provide value for money and maximising the available funding through grants and other sources of funding.

The LHS will be reviewed every year to highlight any issues in meeting the outcomes and considering where they can be altered if required to meet emerging issues over the duration of the strategy.

9. Monitoring and Review

- a. How will the implementation and impact of the policy be monitored, including implementation of any amendments? For example, what type of monitoring will there be? How frequent?
- b. What are the practical arrangements for monitoring? For example, who will put this in place? When will it start?
- c. How will results of monitoring be used to develop future policies?
- d. When is the policy due to be reviewed?
- e. Who is responsible for ensuring this happens?

Please detail below

- There is ongoing monitoring of the LHS with annual reporting to Housing Services PDSP.
- Many of the key actions are reported through other performance monitoring routes such as ARC returns.
- The Scottish Housing Regulator and internal council reporting on performance targets.
- The LHS will be reviewed on an annual basis to ensure that the relevance of the key actions and outcomes.
- A new LHS will be developed in 2027/28
- The Housing Strategy & Development Team will be responsible for ongoing monitoring and review of the LHS.

10. Recommendation and Reasoning

- Implement proposal with no amendments
- Implement proposal taking account of mitigating actions (as outlined above)
- Reject proposal due to disproportionate impact on equality, poverty and socioeconomic disadvantage

Reason for Recommendation

Signed by Lead Officer	
Designation	
Date	
Counter Signature (Head of Service or Depute Chief Executive responsible for the policy)	
Date	

- **Equality impact assessment completed**
- **Final assessment must be published on the council website once the decision to implement has been agreed:**
[Council EQIA Publication Page](#)
- **Link must be included in “Background References” section of committee/management reports**