

West Lothian Council: Equality Impact Assessment

A. About the function, service, policy, procedure, project etc

- 1 What is the name of the function/service/policy/procedure/project etc (called "strategy" from this point) to be assessed?

West Lothian Council Housing & Building Services Homelessness Strategy

- 2 What were the results of the screening for relevance?

The policy has first been screened for relevance and need for a full assessment by initially looking at the all following key issues and questions:

1. Which aspects of the General Duties does it relate to?
2. Is there evidence or reason to believe that some groups could be affected differently?
Which groups?
3. How much evidence do you have?
4. Is there any public concern that functions/policies are operated in a discriminatory manner?

The policy has a high level of relevance to:

- Housing Scotland Act 1987 & 2001
- Race Relations Act 1976 (RRA Amendment Act 2000)
- Sex Discrimination Act 1975
- Disability Discrimination Act 1995 (DDA Amendment Act 2005)
- Protection from Harassment Act 1997
- CRE Code of Practice for Rented Housing
- Recommendations of McPherson Report
- Human Rights Act 1998
- Equal Pay Act 1970

3 Briefly describe the aim of the policy etc.

What needs or duties is it designed to meet? Who are the intended beneficiaries? How will it affect employees? How will it affect the community and the different groups of people within it?

Is the service contracted out or delivered under a service-level agreement or with partners? Who else is involved?

In what way will you involve any of these people in the impact assessment process?

In West Lothian our priorities are focused on the prevention of homelessness by:

- Reducing the overall levels of homelessness within the district
- Providing accommodation and support services as appropriate
- Minimising the damage homelessness causes to families, neighbourhoods and communities
- Ensuring that Homelessness services are accessible to all individuals and groups within the community

B. Gathering the evidence and assessing the impact

4 Is there any evidence (or reason to believe) that this strategy could have a different effect on some groups of people compared to others? (e.g. different needs, different experiences, different outcomes, different rates of participation, different abilities to access opportunities).

Is there an adverse impact around race, gender, disability, faith, sexual orientation, age, health, etc? What are the reasons for this adverse impact?

The strategy could have a different effect on various groups such as:

- Young people
- Women fleeing domestic abuse
- Vulnerable people including people with long term health problems or disabilities

However, it should be noted that this is to the benefit of these groups as the strategy recognises their differing needs and that a static strategy

does not suit their requirements.

It should also be noted that current Homelessness legislation to some extent prescribes that certain groups should be given priority for re-housing, and that this strategy cannot override these legislative requirements.

5 Please describe the evidence or reasoning you have used to make your judgement. What existing data for example (qualitative or quantitative) have you used to form your judgement? Tell us about the information as it applies to different groups (e.g. by race, gender and disability etc).

- Full evaluation of the Homelessness service and it's relevance within West Lothian's homelessness profile the study included both qualitative and quantitative information.
- Research on services available to young people
- Research on development of health services for the homeless population (Moving into Health)
- Consultation with partners who deliver specialist services for those with a disability and young people

6 Are there any unmet needs/requirements that can be identified that affect any of the specific groups?

- Some BME groups are slightly over-represented in homelessness presentations (it should be noted that these numbers are so small in West Lothian that they may not be significant.)
- The availability of suitable temporary accommodation for people with disabilities

C. Making changes and promoting equality

- 7 If in your judgement, the strategy etc does have an adverse impact, can you modify the strategy to reduce/eliminate any adverse impact?

You need to think whether your modifications will:

- have a positive or negative effect on the promotion of equality of opportunity for any group
- help eliminate discrimination in any way
- encourage or hinder community relations.

- The 2 possible areas for improvement do not warrant an unscheduled review of the strategy. They are not unlawful and do not cause a barrier to the involvement of any individual or group as the manner in which this strategy operates allows for a wide variety of options and access. By addressing these areas, would ensure the further development of the homelessness service and the equality of access and opportunity for these under-represented groups and eliminate any possible discrimination.
- Revisiting the availability of temporary accommodation for people with disabilities would help to ensure that there is no chance of discrimination and would help increase the equality of opportunity for this group of people.
- The strategy does not specifically address the issue of homelessness as a result of the breakdown of same sex partnerships, this is not unlawful, but to include this in the strategy would help eliminate any possible discriminatory practice and increase equality of opportunity within the service.

- 8 If you cannot modify the strategy to reduce adverse impact, consider if the impact can be justified and explain. (It is unlikely that you will be able to justify any impact which amounts to unlawful discrimination.)

If the impact cannot be justified, how do you intend to deal with it?

As mentioned above, the lack of focus on disability and same sex partnership breakdowns specifically is not unlawful as the strategy is designed to be all inclusive, and does not justify a rewrite of the strategy document until the scheduled review date. The issue should than be resolved.

D. Consultation

8 What steps have you taken/are you taking to consult externally as part of your assessment?

Whom have you consulted? What methods did you use? How long was the consultation period?

Have you consulted any "experts"? Did you involve any people in the affected groups in some other way during the process?

A full and wide-ranging consultation was conducted in order to produce the Homelessness Strategy document.

The following people were consulted:

- Staff
- Partner agencies, e.g. youth homelessness , West Lothian NHS Healthcare, Cyrenians, homelessness forum, community groups
- Voluntary sector representatives
- Internal partners e.g. Housing & Customer Services, Supporting People (social policy), Criminal Justice
- Independent specialist consultants
- Other Local Authorities, SHBVN, other RSL's

Methodology

- Q & A sessions with key staff members responsible for writing, developing, monitoring & implementing the new strategy
- Steering group sessions (Homelessness Forum)
- Full 3 months consultation and response time on final document
- Wide awareness raising of draft policy to encourage public response

Review period

- This strategy is for 2003 – 2008 and is reviewed and monitored on a 6 monthly basis

E. Next steps

10 What were the results of the consultation?

What have you done with the results i.e. how do you intend to use the information gathered as part of the consultation?

The consultations highlighted areas where it was felt that there could be further development. These were used as the basis for 8 key objectives to be met during the life of the strategy, these are contained in a local outcome agreement shared by both internal and external partners.

11 Have you published the results of that consultation? If so, where? What arrangements were made to reach specific groups affected?

The results are contained within the strategy document that is available in a variety of formats, and is presented in booklets a downloadable format online.

The strategy is widely publicised and available in local offices, libraries, resource centres and in voluntary centres via our distribution list for all public documents.

The distribution list also includes centres for young people, people with disabilities, the local mosque, sheltered housing complexes, surgeries and local health centres and hospitals. Arrangements can also be made for alternative formats such as Braille, large print, audio and community languages.

12 What are your recommendations based on the conclusions of this assessment?

The recommendation based on the evidence and consultations is that this strategy is fit for purpose and carries no risk of different or adverse effect on any group.

There are 2 areas for improvement that should be carried forward into the next revision of this strategy:

- Revisiting the availability of temporary accommodation for people with disabilities would help to ensure that there is no chance of

discrimination and would help increase the equality of opportunity for this group of people.

- The strategy does not specifically address the issue of homelessness as a result of the breakdown of same sex partnerships, this is not unlawful, but to include this in the strategy would help eliminate any possible discriminatory practice and increase equality of opportunity within the service.

13 Please provide us with separate information about how you intend to monitor this policy in future. What is the review date set for this strategy?

Review Date – June 2008

This strategy and it's and it's service documents will be monitored:

- Monthly by the Homeless Development Team
- 6 monthly by elected members through the formal committee structure
- 6 monthly with partners at the Homelessness Steering Group

Evaluation will be undertaken through the life of the document by:

- Consultation with customer and partners
- Quality control through internal verification processes

West Lothian's Homelessness Service (including it's relationship with partner organisations) are subject to evaluation through:

- The West Lothian Assessment Model
- The Supporting People Review Process
- Annual local outcome agreements are required by the Scottish

Executive to ensure satisfactory progress is being made.

14 How will you publish the results of this assessment? What methods will you use? What arrangements are there to reach specific groups affected?

- Website
- Tenants News/Applicants News
- Plasma Screens
- General promotion of Homelessness Service in West Lothian

15 Have you conducted any other types of impact assessment on this strategy? (e.g. health, financial, environmental).

N/a

16 Is there anything else you wish to add?

N/a

Assessment made by:	Sarah Kelly
Others involved in assessment:	Ann Marie Carr
Summary of assessment (this will be published). • What you did • What evidence you used	Screening & full impact assessment on Homelessness Strategy Results on consultations with: <ul style="list-style-type: none">• Staff• Partner agencies• Voluntary sector representatives• Internal partners

<ul style="list-style-type: none"> • What you found • What consultation you undertook • What changes you made • What will happen next. 	<ul style="list-style-type: none"> • Independent specialist consultants • Other Local Authorities, SHBVN, other RSL's • No difference or adverse impact from this policy on any group. Identified 2 areas for improvement within the next review of this strategy. • Consultation with staff, partners and stakeholders was sufficient • No changes required to current strategy • Area for improvement as recommended in this assessment will be carried forward and implemented into the remit of the next review of this strategy.
<p>Manager's Signature</p>	
<p>Date:</p>	
<p>Service area and job title:</p>	

When you have completed this form, please take a copy and send it to your service representative on the Corporate Working Group on Equality and/or the Equality Officer.