

**Supporting Good Decisions**

**Promoting Equality & Human Rights, Reducing Inequality and Protecting the Environment**

**Integrated Impact Assessment Form**

**Integrated Impact Assessment Form**

**Promoting Equality, Human Rights and Sustainability**

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| **Title of Policy/ Proposal** | Rent increase proposal 2025/26 |
| **Timescale for Implementation** | 18th November 2024 |
| **IIA Completion Date** | 11th November 2024 |
| **Completed by** | Deborah Piner |
| **Lead officer** | Stephanie Irvine |

**Section 1: Screening**

**1.1 Briefly describe the policy/proposal/activity you are assessing.**

Due to a proposal to increase council house rents, a consultation is being undertaken with tenants, Registered Tenant Organisations, local tenants and residents groups and ELTRP but the final decision to increase will be taken by East Lothian Council Elected Members.

* 1. **What will change as a result of this policy?**

Due to a proposal to increase council house rents, a consultation is being undertaken with tenants suggesting a proposed 7% increase for 2025/26. Following the consultation with tenants, all the feedback received will be considered by the council at a series of council committee meetings. The decision will be taken at this stage if council house rents will increase in the next financial year.

**1.3** **Deciding if a full Impact Assessment is needed.** Please answer the following questions:

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|  | **Yes** | **No** |
| 1. The policy/ proposal has consequences for or affects people e.g. how they can access a service? | Yes |  |
| 1. The policy/proposal has potential to make a significant impact on equality? |  | No |
| 1. The policy/proposal is likely to have a significant environmental impact? |  | No |
| 1. The policy/ proposal has implications for the storage/ collection of personal data? |  | No |

* If you have answered yes to questions 1 and 2 above, please proceed to complete the Integrated Impact Assessment. If you have answered No then an IIA does not need to be completed. Please keep a copy of the screening paperwork.
* If you have identified that your project will have a significant environmental impact, please proceed to complete the Integrated Impact Assessment. You will also need to consider whether you need to complete a Strategic Environmental Assessment. Please contact
* If you have answered yes to question 4, please seek further advice from the Data Protection Officer.

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**Section 2: Integrated Impact Assessment**

* 1. **Have those who are affected by the policy had the opportunity to comment on new proposals?** We are carrying out a consultation with all current council tenants, Registered Tenant Organisations, local tenants and residents groups and ELTRP. Equalities Monitoring Information (on age, disability, sex, race, religion, ethnic origin) will be captured from tenants who complete and return our consultation questionnaire which will help us to understand the demographics of our tenants. Our consultation will run from 18th November to 20th December 2024. We will support ELTRP to hold a consultation event to invite tenants and their members along to discuss the proposal to increase council house rents.

**What information/data have you used to inform the development of the policy to date?**

A Project Group comprising of council staff from Community Housing, Revenues, Finance, our Cabinet Spokesperson for Housing and members of East Lothian Tenants & Residents Panel (ELTRP) have agreed an approach and drafted a set of consultation documents which have been designed by a Sub-Group (of ELTRP members and a council member of staff) for this year’s rent consultation. This approach includes designing a customer friendly consultation letter, with an additional information sheet and questionnaire. The letter includes key information for tenants on what their rent pays for. The additional information explains to tenants the range of ways they can contact the council and if they are experiencing financial difficulties, how they can get help and support. The questionnaire is for tenants to give their views on the proposal and to advise if they agree with a 7% increase. The Group also agreed that we would email out this year’s consultation documents to those tenants who we have an email address for and also send a text reminder to tenants who have registered a mobile phone number with us. The use of emails and texts for the rent consultation were used for the first time in the 2021/22 rent consultation and this proved to be successful in contacting tenants and generating responses.

* 1. **What does the evidence/ research suggest about the policy’s actual or likely impact on equality groups and those vulnerable/ or experiencing socio-economic disadvantage?**

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| **Evidence** | **Comment** |
| Which groups are in particular need of this service? | The proposed rent increase will have an effect on all equality groups if they are council tenants. Having considered factors, equalities groups would not be disproportionately disadvantaged. If a decision is taken by Council to increase rents this will allow the council to maintain existing housing services, continue with investment in the development of new homes, maintain and improve our existing housing stock.  We will email out the consultation documents to those tenants who we have an email address for. We will post out to tenants who do not have an email address and for those tenants who have specific needs, we will provide the consultation documents in other formats or languages and assistance on request.  Tenants will be able to contact staff in the Service Development Team for support or assistance for the duration of the consultation and this may include signposting tenants to other services or agencies for assistance or advice. This includes our Financial Inclusion Team. Representatives from ELTRP have co-produced the rent consultation in partnership with us, making sure they bring a tenant perspective to the Group whilst designing the consultation documents. |
| What level of service uptake/ access is there from protected and vulnerable groups? |
| Can you identify positive outcomes for service users |
| What is the service user experience of those from protected or vulnerable groups? |
| What opportunity have those from protected groups had to co-produce or comment on the service/ plans? |

* 1. **How does the policy meet the different needs of groups in the community?**

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| **Equality Groups**   * Older people, people in the middle years      * Children and young people 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) * Minority ethnic people (includes Gypsy/Travellers, migrant workers) * Refugees and asylum seekers * People with different religions or beliefs (includes people with no religion or belief) * Lesbian, gay, bisexual and heterosexual people * People who are unmarried, married or in a civil partnership | The proposed rent increase could have an effect on all falling into poverty if they are council tenants. Having considered factors, equalities groups would not be disproportionately disadvantaged. If a decision is taken by Council to increase rents, this will allow the council to maintain existing housing services, continue with investment in the development of new homes, maintain and improve our existing housing stock.  This is explained and financial information and how to get support is provided in the consultation documents.  Tenants who may be entitled to housing benefit, universal credit or who may be experiencing financial difficulties are provided with information through the consultation about how they can get help and any support they may need by contacting the Council’s Benefits or Financial Inclusion Teams.  Tenants will be able to contact staff in the Service Development Team for support or assistance for the duration of the consultation and may be signposted to other services or agencies for assistance or advice. |
| **Those vulnerable to falling into poverty**   * Unemployed * People on benefits * Lone Parents * Care experienced children and young people * Carers (including young carers) * Homeless people * Those involved in the community justice system * People with low literacy/numeracy * Families with 3 or more children * Those with a child/ children under 1 | As already stated the proposed rent increase could have an effect on all those vulnerable, if they are council tenants. However, any rent increase will allow the council to maintain existing housing services, continue with investment in the development of new homes, maintain and improve our existing housing stock.  Tenants who may be entitled to housing benefit, universal credit or who may be experiencing financial difficulties are provided with information through the consultation about how they can get help and support they may need by contacting the Council’s Benefits or Financial Inclusion Teams.  Tenants will be able to contact staff in the Service Development Team and may be signposted to other services or agencies for assistance or advice on benefits and Financial Inclusion Service. |
| **Geographical communities**   * Rural/ semi rural communities * Urban Communities * Coastal communities * Those living in the most deprived communities (bottom 20% SIMD areas) | Those living in all communities whether rural or urban will be affected in the same way by rent increases. |
| **Communication Needs:**   * Gaelic Language Speakers * BSL users * English as a Second Language * Other e.g. DeafBlind, Plain English, Large Print | Support and signposting will be made available to those who need assistance with returning the rent consultation documents. |

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

A report with all the feedback gathered through the consultation and demographic information on the tenants who responded to the consultation will be presented to Council. A final decision on the proposal to increase rents and the level at which they will be increased by, will be taken by the Council at a special budget meeting in February 2025.

* 1. **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? This is done through our corporate procurement process. The Tenants Information Service (TIS), who are currently contracted to provide the independent development support to tenants, Registered Tenant Organisations, tenants groups and ELTRP, are an Equal Opportunities Employer and have a statement promoting equal opportunities within their current contract document. TIS are a tenant-led organisation committed to supporting tenants and landlord organisations and have provided a Digital Toolkit to enable digital engagement to continue meaningful participation post-pandemic. The staff contracted to undertake this work will support and assist tenants and ELTRP to engage and participate in this consultation.

* 1. **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?**

Yes, we will communicate the outcome of this year’s rent consultation and council’s budget meeting to all our tenants by way of letter, email, by posting information on the council website and will then follow up with information in our tenants’ newsletter, Homefront. These publications and methods of communication will provide tenants with the option to request the information in alternative formats e.g. braille, large print, and audiotape or in their own language.

* 1. **Please consider how your policy will impact on each of the following?**

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| **Equality and Human rights**   * Promotes / advances equality of opportunity e.g. improves access to and quality of services * Promotes good relations within and between people with protected characteristics and tackles harassment * Promotes participation, is inclusive and gives people control over decisions which affect them * Preserves dignity and self-respect of individuals (does not lead to degrading treatment or stigma) * Builds support networks, resilience, community capacity |
| Comments:  Neutral impact but by increasing rents we will be able to improve the quality of service to our tenants. |
| **Reduces Poverty**   * Maximises income and/or reduces income inequality * Helps young people into positive destinations * Aids those returning to and those progressing within the labour market * Improves employability skills, including literacy and numeracy * Reduces the costs of taking part in activities and opportunities * Reduces the cost of living |
| Comments :  Neutral impact – the increase enables the council to continue to maintain their existing stock and planned maintenance programmes and provide new build housing. Referrals can be made to our tenancy support officers, financial inclusion team and other agencies to seek advice and support and also to advise on maximising income making sure tenants are receiving income and benefits that they are entitled too. |
| **Protecting the Environment and Improving Sustainability**:   * Reduces the need to travel or increases access to sustainable forms of transport * Minimises waste / encourages resource efficiency / contributes to the circular economy * Ensures goods / services are from ethical, responsible and sustainable sources * Improves energy efficiency / uses low carbon energy sources * Protects and/or enhances natural environments / habitats / biodiversity * Promotes the transition to a low carbon economy * Prepares and/or adapts communities for climate change impacts |
| Comments:  Increasing the rent will enable the council to continue to maintain council houses to Scottish Quality Housing, Energy Efficiency Standard (EESSH) and any new future energy efficiency measures. |

**Section 3.Action Plan**

What, if any changes will be made to the proposal/ policy as a result of the assessment?

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| **Changes to be made** | **Expected outcome of the change** | **Resources Required** | **Timeline** | **Responsible person** |
| None required. |  |  |  |  |
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**For consideration of the Head of Service**

Can you identify any cumulative impacts on equality groups or vulnerable people arising from this policy, when considered alongside other changes across other services?

**Sign off by Head of Service**

Name: Wendy McGuire

Date: 11th November 2024