

# Integrated Impact Assessment

The purpose of South Lanarkshire Council is to protect the people and the place of South Lanarkshire from harm, enabling them to prosper and supporting them in case of harm happening.

The purpose of an Integrated Impact Assessment is to evidence that South Lanarkshire Council is making decisions in an informed way, and that the impact of decisions made is understood and accepted. The council is subject to a range of legal duties that govern its decision-making, and it is vital that these duties are complied with. This Integrated Impact Assessment considers the key legal duties. Other relevant duties are referenced in the guidance that accompanies this Integrated Impact Assessment, and will need to be considered as required by those undertaking the assessment.

The legislation that is considered within this assessment are:

* Section 2 [Equality Act 2010 protected characteristics](#_2:_Equality_Act)
* Section 3 [Socio-Economic](#_3:_Socio-Economic_Impacts)
* Section 4 [Human Rights](#_4:_Human_Rights)
* Section 5 [Children and Young People’s Rights](#_5:_Children_and)
* Section 6 [Consumer Duty](#_Section_6_)
* Section 7 [Sustainability](#_Section_7_-)
* Section 8 [Armed Forces Duty](#_Section_8_–)
* Section 9 [Sign Off](#_9:_Sign_Off)

The term ‘policy’ is used throughout this document and applies to policies, proposals, strategies, provision, criteria, functions, practice, budget savings and activities that includes delivery of our services.

## About the Policy

|  |
| --- |
| **1.1 Title - Policy Title (include budget reference number if applicable)** |
| Scheme of Assistance (SoA) |
| **1.2 What does this policy seek to achieve?** |
| The statement sets out how the council will provide assistance to homeowners, private landlords and private tenants carrying out maintenance, repair and adaptations to their homes. |
| **1.3 Is this a new or existing policy?** |
| This requirement to publish a Scheme of Assistance has been in place since 2010 having been introduced by the Housing (Scotland) Act 2006 |
| **1.4 Is this report going to a committee?** |
| Yes |
| **1.5 Committee name and date:** |
| Housing and Technical Services Committee on 14 May 2025 for approval. |
| **1.6 Resource and Service -** |
| Housing Services, within Housing and Technical Resources |

**Impacts**

This section shows the considerations that have been made in relation to the policy - and that the impact of proposals made is understood and accepted.

## Equality Act 2010 - Protected Characteristics

South Lanarkshire Council wants to ensure everyone is treated fairly. This section identifies the [protected characteristics](https://www.equalityhumanrights.com/equality/equality-act-2010/protected-characteristics) that the policy potentially affects and records the impact and mitigating steps.

### **2.1 What impact could this policy have on any of the groups below?**

|  | **What is the impact?** | | | | |
| --- | --- | --- | --- | --- | --- |
|  | **Negative** | | | **Neutral** | **Positive** |
| **Protected Characteristic** | **High** | **Medium** | **Low** |  |  |
| [Age](https://www.equalityhumanrights.com/equality/equality-act-2010/your-rights-under-equality-act-2010/age-discrimination) |  |  |  |  | √ |
| [Disability](https://www.equalityhumanrights.com/equality/equality-act-2010/your-rights-under-equality-act-2010/disability-discrimination) |  |  |  |  | √ |
| [Gender Reassignment](https://www.equalityhumanrights.com/equality/equality-act-2010/your-rights-under-equality-act-2010/gender-reassignment-discrimination) |  |  |  | √ |  |
| [Marriage and Civil Partnership](https://www.equalityhumanrights.com/equality/equality-act-2010/your-rights-under-equality-act-2010/marriage-and-civil-partnership) |  |  |  | √ |  |
| [Pregnancy and Maternity](https://www.equalityhumanrights.com/equality/equality-act-2010/your-rights-under-equality-act-2010/pregnancy-and-maternity) |  |  |  | √ |  |
| [Race](https://www.equalityhumanrights.com/equality/equality-act-2010/your-rights-under-equality-act-2010/race-discrimination) |  |  |  | √ |  |
| [Religion or Belief](https://www.equalityhumanrights.com/equality/equality-act-2010/your-rights-under-equality-act-2010/religion-or-belief-discrimination) |  |  |  | √ |  |
| [Sex](https://www.equalityhumanrights.com/equality/equality-act-2010/your-rights-under-equality-act-2010/sex-discrimination) |  |  |  | √ |  |
| [Sexual Orientation](https://www.equalityhumanrights.com/equality/equality-act-2010/your-rights-under-equality-act-2010/sexual-orientation-discrimination) |  |  |  | √ |  |

### **2.2 How will the policy impact people with these protected characteristics?**

|  |
| --- |
| It has been assessed that that the Scheme of Assistance will overall have a positive or neutral impact to those with protected characteristics. It is a statement which aims to assist homeowners, and private tenants who require adaptations to remain in their homes with identified works being carried out to assist with this. |

### **2.3 What considerations have been made in reaching the above assessment?**

|  |
| --- |
| **What internal or external data has been considered? What does this data tell us?** |
| The Scheme of Assistance and the associated impact assessments have been developed through consideration of the positive contribution the scheme can make to all who reside or wish to reside within South Lanarkshire.  The SoA aims to ensure those with protected characteristics, such as age and disability, are positively impacted through the provision of help to allow them to remain in their homes for as long as able to.  This provision has been identified within the Local Housing Strategy (LHS), and with the assistance of colleagues in Property Services, Health and Social Care Partnership, Finance, and Community Services. |
| **What consultation and engagement has been undertaken with officers and partner organisations?** |
| Led by Housing Services, the SoA has been developed in conjunction with officers from across the council, including Health and Social Care Partnership, Property Services, Environmental Health and Finance.  Discussions through this have included the need to ensure those with protected characteristics are not negatively impacted by the proposals contained within the plan. |
| **What consultation and engagement has been undertaken with people who may be impacted by this policy (for example citizens, community groups, or other people/groups)?** |
| Engagement has taken place with the following groups:   * Tenant Participation Co-ordination Group Repairs Sub Group * Equality and Diversity Co-ordination Group * Disability Housing Partnership Sub Group * South Lanarkshire Landlords Forum * Local Housing Strategy Steering Group   As well as being publicised through social media, and emails issued to both the members of the Peoples Panel and Registered Social Landlords.  The consultation was open for a 3 month period from 20 December 2024 until 14 March 2025 and provided an overview of the SoA requesting feedback, to ensure priorities for assistance provide equality for all.  Social media was used to encourage residents to respond to the survey, and targeted emails were issued to all South Lanarkshire registered landlords, as well as being issued to South Lanarkshire’s People’s Panel.  Views on the website increased by 1025 percent during the consultation period. At the closing date, 191 responses were received. Further details of the responses can be found at 3.3. |

### **2.4 What mitigations can be put in place?**

|  |  |  |
| --- | --- | --- |
| **What mitigations are there against any negative impacts (if applicable)?** | | |
| Not applicable | | |
| **With mitigations in place, what is the new overall rating of the negative impact(s)?** | High |  |
| Medium |  |
| Low |  |
| Negative Impact Removed |  |

### **Public Sector Equality Duty**

South Lanarkshire Council has a duty under the Equality Act 2010 to comply with the Public Sector Equality Duty ("PSED"). This duty runs through every aspect of the council's day-to-day business, and the council must have due regard to how it can promote equality and improve outcome for those that have protected characteristics. To ensure that the council complies with the PSED, you should consider the following points:

|  |
| --- |
| **Does this policy contribute towards the need to eliminate discrimination, harassment, victimisation or any other conduct that is prohibited by or under the Equality Act 2010?** |
| Yes, the SoA contributes to the duty through the provision of assistance including funding, to owner occupiers or private tenants who have been identified as having an assessed need for an adaptation, which will allow them to remain in their own home, avoiding the need in some cases for hospitalisation or moving to alternative housing. This assistance will provide help to those who are living with a disability.  In addition, the SoA will contribute to this duty through the provision of assistance, including funding, to help improve or maintain house conditions for those who require it to access it, regardless of whether they have protected characteristics or not. |
| **Does this policy advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it?** |
| Yes, through the SoA there will be opportunities for those with an identified need to obtain assistance towards carrying out adaptations to their homes, to allow them the opportunity to remain at home.  In addition, there will be opportunities for all owners and private landlords to gain access to assistance to carry out maintenance and repair to their homes, regardless of whether they have protected characteristics or not. |
| **Does this policy foster good relations between persons who share a relevant protected characteristic and persons who do not share it?** |
| It has been assessed that the SoA will have a neutral impact in this area. |

## 3. Socio-Economic Impacts

This section is used to consider the impact of the policy on people who might be **unemployed**, **single parents**, people with lower **education** or **literacy**, **looked** **after** **children**, those with **protected characteristics** as examples.

Use this guide to understand more on socio-economic inequalities: [The Fairer Scotland Duty: Guidance for Public Bodies (www.gov.scot)](https://www.gov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2021/10/fairer-scotland-duty-guidance-public-bodies/documents/fairer-scotland-duty-guidance-public-bodies/fairer-scotland-duty-guidance-public-bodies/govscot%3Adocument/fairer-scotland-duty-guidance-public-bodies.pdf)

#### **3.1 What impact could this policy have on any of the groups below?**

| **Group** | **Negative** | | | **Neutral** | **Positive** |
| --- | --- | --- | --- | --- | --- |
| **High** | **Medium** | **Low** |
| Low income / income poverty – those who cannot afford regular bills, food, clothing payments. |  |  |  |  | √ |
| Low and/or no wealth – those who can meet basic living costs but have no savings for unexpected spend or provision for the future |  |  |  |  | √ |
| Material deprivation – those who cannot access basic goods and services, unable to repair/replace broken electrical goods, heat their homes or access to leisure or hobbies |  |  |  |  | √ |
| Area deprivation – consider where people live and where they work (accessibility and cost of transport) |  |  |  |  | √ |
| Socio-economic background – social class, parents’ education, employment, income. |  |  |  |  | √ |

#### **3.2 In what way will the policy impact people in these groups?**

|  |
| --- |
| The SoA will have a positive socio-economic impact through the provision of assistance in carrying out repairs and maintenance to people’s homes, which will protect the condition of their homes, and assist in protecting their assets.  In addition, for people who have a disability, they are provided with access to practical and financial help in carrying out any identified adaptations to their homes. |

#### **3.3 What considerations have been made in reaching the above assessment?**

|  |
| --- |
| **What internal or external** data has been **considered?** What does this data tell us? |
| In delivering the SoA, a key focus is in ensuring help is made available to private owners, landlords and private tenants who may need help in carrying out repairs and maintenance to their homes. In addition, where a private owner or private tenant has an identified need for an adaptation, the provision of help can allow them to remain in their homes, and avert the need for more specialist housing or care.  South Lanarkshire Council’s 4th Local Housing Strategy is organised into five chapters that highlight the cross-cutting and integrated contribution of partners towards promoting suitable and sustainable housing in South Lanarkshire. Chapters 1-3 cover the main, interlinked drivers of supply, quality, and support, for promoting suitable and sustainable housing, taking account of changing energy efficiency standards and the drive for decarbonisation to address climate change. Each provides an assessment of the current position and sets out ambitions and priorities for improvement and development over the next five years.  Chapter 5 ‘Sustainable Places’ covers all area-based projects where housing contributes towards sustainable place-making, including housing regeneration programmes and major developments. This section provides a framework for the LHS to also align with community planning priorities, and localities.  Specific outcomes are set out within the LHS relevant to the SoA include:  2.Private landlords and tenants are supported to ensure renting remains a sustainable housing option that meets all required standards.  3.Housing quality and energy efficiency are improved across all tenures, with advice and support provided to property owners and tenants to help them achieve the required standards.  5.People with particular needs are better supported to live independently within the community in a suitable and sustainable home.  A summary of the consultation response is detailed below:   * 46 percent responded indicating that they were clear who the Scheme of Assistance is for * 40 percent indicated that it is clear what the Scheme of Assistance is. * 33 percent responded indicating that it was clear how the Scheme can be accessed * 28 percent though the grant options which were clear and easy to understand.   Individual comments positively noted the following:   * All seems clear and links for additional help are great. * Grant options are clear and easy to understand. * Great service in installation of wet room |
| **What consultation and engagement and has been undertaken with officers and partner organisations?** |
| Led by Housing Services, the SoA was developed in conjunction with officers from across the council and in alignment with legislative duties. Discussions through this have included the need to ensure resources, including grant funding, is made available to those who are most in need of help, to provide greater ongoing benefit to the homeowners, private tenants and those with assessed need. Partners were encouraged to advise of any additional partners who they thought may be interested in the consultation. |
| **What consultation and engagement and has been undertaken with people who may be impacted by this policy? citizens, community groups, or other people/groups impacted by this policy?** |
| Engagement has taken place with tenant representatives and relevant officers within the TCPG Repairs Sub Group, Equality and Diversity Co-ordination Group, Disability Housing Partnership Sub Group, South Lanarkshire Landlords Forum, LHS Steering Group.  As well as being advertised through social media, and emails issued to both the members of the Peoples Panel and Registered Landlords. |

#### **3.4 What mitigations can be put in place?**

| **What mitigations are there against any negative impacts (if applicable)?** | | |
| --- | --- | --- |
| Wording in the Scheme of Assistance statement has been reviewed to make this clearer, and easier to read. | | |
| **With mitigations in place, what is the new overall rating of the negative impact(s)?** | High |  |
| Medium |  |
| Low | X |
| Negative Impact Removed |  |

## 4. Human Rights Impacts

The Human Rights Act 1998 sets out the fundamental rights and freedoms that everyone in the UK is entitled to. It incorporates the rights set out in the European Convention on Human Rights (ECHR) into domestic British law. The Human Rights Act came into force in the UK in October 2000

The Act sets out our human rights in a series of ‘Articles’. Each Article deals with a different right.

Use this guide to understand more about [Human Rights](https://www.equalityhumanrights.com/en/human-rights/human-rights-act).

### **4.1 What impact could this policy have on Human Rights?**

| **Human Rights Article** | **Negative** | **Neutral** | **Positive** |
| --- | --- | --- | --- |
| **Article 6:** [Right to a fair trial](https://www.equalityhumanrights.com/human-rights/human-rights-act/article-6-right-fair-trial) |  | √ |  |
| **Article 7:** [No punishment without law](https://www.equalityhumanrights.com/human-rights/human-rights-act/article-7-no-punishment-without-law) |  | √ |  |
| **Article 8:** [Right to respect for private and family life, home and correspondence](https://www.equalityhumanrights.com/human-rights/human-rights-act/article-8-respect-your-private-and-family-life) |  |  | √ |
| **Article 9:** [Freedom of thought, belief and religion](https://www.equalityhumanrights.com/human-rights/human-rights-act/article-9-freedom-thought-belief-and-religion) |  | √ |  |
| **Article 10:** [Freedom of expression](https://www.equalityhumanrights.com/human-rights/human-rights-act/article-10-freedom-expression) |  | √ |  |
| **Article 11:** [Freedom of assembly and association](https://www.equalityhumanrights.com/human-rights/human-rights-act/article-11-freedom-assembly-and-association) |  | √ |  |
| **Article 12:** [Right to marry and start a family](https://www.equalityhumanrights.com/human-rights/human-rights-act/article-12-right-marry) |  |  | √ |
| **Article 14:** [Protection from discrimination in respect of these rights and freedoms](https://www.equalityhumanrights.com/human-rights/human-rights-act/article-14-protection-discrimination) |  | √ |  |
| **Article 1 of Protocol 1:** [Right to peaceful enjoyment of your property](https://www.equalityhumanrights.com/human-rights/human-rights-act/article-1-first-protocol-protection-property) |  |  | √ |
| **Article 2 of Protocol 1:** [Right to education](https://www.equalityhumanrights.com/human-rights/human-rights-act/article-2-first-protocol-right-education) |  |  | √ |
| **Article 3 of Protocol 1:** [Right to participate in free elections](https://www.equalityhumanrights.com/human-rights/human-rights-act/article-3-first-protocol-right-free-elections) |  | √ |  |

### **4.2 In what way will the policy impact Human Rights?**

|  |
| --- |
| It is assessed that the SoA will have a neutral impact on the majority of the Human Rights Articles, with some seeing a positive impact from the contents of the plan. This includes:  **Article 8**  Through the provision of assistance to home owners, landlords and private tenants, more individuals would benefit from having access to safe, secure accommodation that meets their needs in areas they wish to live. This would support a range of areas within the article, including the right to privacy, engage with society and receive correspondence.  **Article 12**  Through the provision of assistance to home owners, landlords and private tenants, more individuals would benefit from having access to safe, secure accommodation that meets their needs in areas they wish to live. This will also provide further opportunities to marry and start a family.  **Article 1 or Protocol 1**  Through the provision of assistance to home owners, landlords and private tenants across South Lanarkshire, more individuals would benefit from having access to safe, secure accommodation that meets their needs in areas they wish to live. This includes having the ability to store and secure their own property within their home. |

### **4.3 What mitigations can be put in place?**

| **What mitigations are there against any negative impacts (if applicable)?** | | |
| --- | --- | --- |
| Not applicable | | |
| **If mitigations are in place, does this remove the negative impact?** | No – negative impact remains |  |
| Yes – negative impact reduced |  |
| Yes - negative impact removed |  |

## Children and Young People’s Rights Impacts Assessing for impact on the [UNCRC requirements](https://www.gov.scot/binaries/content/documents/govscot/publications/factsheet/2020/08/united-nations-convention-on-the-rights-of-the-child-bill-rights-and-requirements/documents/united-nations-convention-on-the-rights-of-the-child-bill-rights-and-requirements/united-nations-convention-on-the-rights-of-the-child-bill-rights-and-requirements/govscot%3Adocument/UNCRC%2BBill%2B-%2BThe%2Brights%2Band%2Brequirements%2Bto%2Bbe%2Bincluded%2Bin%2Bthe%2BBill%2B-%2Bstrike%2Bthrough%2Bversion%2B%2528002%2529.pdf)

Legislation to incorporate the UN Convention on the Rights of the Child (UNCRC) into Scots law came into force in July 2024. This requires the council to make proactive steps to ensure it is protecting children's rights when it is making decisions and delivering services, and to report on the progress it is making to do this.

The UNCRC has 54 articles that cover all aspects of a child’s life and set out the civil, political, economic, social and cultural rights that all children everywhere are entitled to. It also explains how adults and governments must work together to make sure all children can enjoy all their rights.

Children’s rights apply to every child/young person under the age of 18 and to adults still eligible to receive a “children’s service” (for example care leavers aged 18 – 25 years old).

The Conventions are also known as the “General Principles” and they help to interpret all the other articles and play a fundamental role in realising all the rights in the Convention for all children. They are:

1. Non-discrimination (Article 2)
2. Best interest of the child (Article 3)
3. Right to life survival and development (Article 6)
4. Right to be heard (Article 12)

You can [**read the full UN Convention (pdf)**](https://www.unicef.org.uk/wp-content/uploads/2010/05/UNCRC_PRESS200910web.pdf), or [**just a summary (pdf)**](https://www.unicef.org.uk/wp-content/uploads/2019/10/UNCRC_summary-1_1.pdf), to find out more about the rights that are included.

### **5.1 What impact could this policy have on the rights of Children and Young People?**

| **UNCRC and Optional Protocols** | **Negative** | **Neutral** | **Positive** |
| --- | --- | --- | --- |
| **Article 1:** definition of the child |  | √ |  |
| **Article 2:** non-discrimination |  | √ |  |
| **Article 3:** best interests of the child |  | √ |  |
| **Article 4:** implementation of the convention |  | √ |  |
| **Article 5:** parental guidance and a child's evolving capacities |  | √ |  |
| **Article 6:** life, survival and development |  | √ |  |
| **Article 7:** birth registration, name, nationality, care |  | √ |  |
| **Article 8:** protection and preservation of identity |  | √ |  |
| **Article 9:** separation from parents |  | √ |  |
| **Article 10:** family reunification |  | √ |  |
| **Article 11:** abduction and non-return of children |  | √ |  |
| **Article 12:** respect for the views of the child |  | √ |  |
| **Article 13:** freedom of expression |  | √ |  |
| **Article 14:** freedom of thought, belief and religion |  | √ |  |
| **Article 15:** freedom of association |  | √ |  |
| **Article 16:** right to privacy |  | √ |  |
| **Article 17:** access to information from the media |  | √ |  |
| **Article 18:** parental responsibilities and state assistance |  | √ |  |
| **Article 19:** protection from violence, abuse and neglect |  | √ |  |
| **Article 20:** children unable to live with their family |  | √ |  |
| **Article 21:** adoption |  | √ |  |
| **Article 22:** refugee children |  | √ |  |
| **Article 23:** children with a disability |  |  | √ |
| **Article 24:** health and health services |  | √ |  |
| **Article 25:** review of treatment in care |  | √ |  |
| **Article 26:** social security |  | √ |  |
| **Article 27:** adequate standard of living |  |  | √ |
| **Article 28:** right to education |  | √ |  |
| **Article 29:** goals of education |  | √ |  |
| **Article 30:** children from minority or indigenous groups |  | √ |  |
| **Article 31:** leisure, play and culture |  | √ |  |
| **Article 32:** child labour |  | √ |  |
| **Article 33:** drug abuse |  | √ |  |
| **Article 34:** sexual exploitation |  | √ |  |
| **Article 35:** abduction, sale and trafficking |  | √ |  |
| **Article 36:** other forms of exploitation |  | √ |  |
| **Article 37:** inhumane treatment and detention |  | √ |  |
| **Article 38:** war and armed conflicts |  | √ |  |
| **Article 39:** recovery from trauma and reintegration |  | √ |  |
| **Article 40:** juvenile justice |  | √ |  |
| **Article 41:** respect for higher national standards |  | √ |  |
| **Article 42:** knowledge of rights |  | √ |  |
| **Optional**  Protocol on a Communications Procedure |  | √ |  |

### **5.2** **Children’s Rights Wellbeing Impact Assessment**

|  |
| --- |
| **Considerations** |
| **1.Which UNCRC Articles are relevant to the CRWIA**?  Article 27: Sufficient Standard of Living  Article 31: leisure, play and culture |
| **2.What impact will the policy/measure will have on children’s rights?**  Through helping homeowners, private landlord and private tenants carrying out maintenance, repair and adaptations to their properties, children will benefit from having access to properties in a good condition of maintenance and repair that meet their needs as members of a family. |
| **3. Will there be different impacts on different groups of children and young people**?  No, help at various levels is available to all home owners, and private tenants so does not differentiate between different groups of children and young people living in these properties. |
| **4. If a negative impact is assessed for any area of rights or any group of children and young people, what options have you considered to modify the proposal, or mitigate the impact?**  Not applicable |
| **5. How will the policy/measure contribute to the wellbeing of children and young people in Scotland?**  The Scheme of Assistance supports the broader aim of ensuring well maintained housing, which will assist wellbeing through the provision of good, safe, secure and warm homes for children and young people and the families within which they belong. |
| **6. How will the plan give better or further effect to the implementation of the UNCRC in Scotland?**  See no 5. |
| **7. What evidence have you used to inform your assessment?**  Scottish Government Annual Return |
| **8. Have you consulted with relevant stakeholders?**  Detailed at 2.3 |
| **9. How has the voice of children and young people informed this area of work and the CRWIA?**  As detailed at 2.3 while no direct involvement has taken place with children and young people, a number of internal/external partners have contacted to raise awareness of the review of the scheme. |
| **10. Have you involved children and young people in the development of the policy/measure**?  As detailed at 2.3 while no direct involvement has taken place with children and young people, a number of internal/external partners have contacted to raise awareness of the review of the scheme. |
| **11. Overall summary of changes made as a result of impact assessment.**  No specific changes are necessary to the revised policy as a result of this impact assessment. |
| **12. If there are any remaining negative impacts after mitigation, what is the justification for why this policy should proceed.** |
| Not applicable. |
| **13. How will the impact of the plan be monitored and reported on an ongoing basis?**  Regular monitoring on performance is reported by colleagues in Finance and Corporate Resources in the Scottish Government Annual Return. |

## Consumer Duty

The Consumer Scotland Act 2020 created a legal duty, called the Consumer Duty. The Consumer Duty requires ‘relevant public authorities’ in Scotland, when they are making decisions of a strategic nature through the exercise of their functions, to have regard to:

* The **impact** of those decisions on consumers in Scotland
* The **desirability of reducing harm** to consumers in Scotland
* Guidance produced by Consumer Scotland

**Links to Guidance:**

* [how-to-meet-the-consumer-duty-guidance-for-public-authorities-draft.pdf](https://consumer.scot/media/a3nnuxre/how-to-meet-the-consumer-duty-guidance-for-public-authorities-draft.pdf)
* [consumer-duty-guidance-carrying-out-an-impact-assessment-draft.pdf](https://consumer.scot/media/nvujehcj/consumer-duty-guidance-carrying-out-an-impact-assessment-draft.pdf)

### **6.1 Consider this policy against the Consumer Duty**

|  |
| --- |
| **Planning**  The Scheme of Assistance is a strategic document setting out how help will be provided to private home owners, landlords and private tenants and will be considered a ‘strategic decision’ in line with the consumer duty guidance.  Approval of the revised scheme should ensure home owners and private tenants are provided with assistance to help them in maintaining and carrying out adaptations to their homes. |
| **What Evidence do you have to support this decision?**  The revised scheme supports delivery of the consumer duty based on the 7 consumer principles as follows: Access, Choice, Safety, Information, Fairness, Representation, and Redress. |
| **Assess and Improve the proposal**  The revised statement has been prepared following a 3 month consultation with the public, internal, and external stakeholders. |
| **Changes to the policy and finalisation**  The revised statement reflects changes following analysis of the feedback from stakeholders.  Wording in the Scheme of Assistance statement has been reviewed in attempts to make this clearer, and easier to read, however there are some areas that cannot be changed as they are written to reflect statutory requirements of the scheme. |

## Sustainability Impact Assessment

**Background Information**

Reducing the council’s contribution to climate change and taking action to reduce the impacts of climate change is central to living and working sustainably.

The council has a statutory duty under the Climate Change (Scotland) Act 2009 to:

* reduce carbon emissions from its activities and influence the reduction of carbon emissions in the wider community;
* take action to adapt to the impacts caused by the effects of climate change – in our local communities, on our buildings, infrastructure, service delivery and the natural environment; and;
* to act sustainably in everything it does as a council

This legislation requires the council to consider all the above within its decision-making processes.

This template aims to ensure that factors related to carbon, climate change adaptation and sustainability are included within a proposal.

Assessing the impact also supports the Climate Change (Duties of Public Bodies: Reporting Requirements) (Scotland) Amendment Order 2020 which requires public bodies to include in their annual climate change reports “how the body will align its spending plans and use of resources with emissions targets”.

Assessing this impact will help mitigate one of the council’s top risks: ‘the failure to meet sustainable development and climate change objectives’ and supports a main objective of the council’s Sustainable Development and Climate Change Strategy 2022-2027: ‘to build a sustainable, climate resilient and net zero South Lanarkshire together in a fair and inclusive way’.

Sustainability impact assessments aim to consider likely effects of proposals on South Lanarkshire’s people, infrastructure, natural and physical environment. They are **not an in-depth** expert assessment but rather a high-level assessment which helps consider impacts in terms of carbon emissions, adapting to the effects of climate change, social justice, economic wellbeing, and good environmental stewardship, as well as the steps taken (or planned) to mitigate any adverse impacts.

| **SUSTAINABLITY IMPACT ASSESSMENT TEMPLATE** | | | | | |
| --- | --- | --- | --- | --- | --- |
| **Ref No.** | **Category** | **Question(s)** | **Yes/No/Unknown** | **Description of Impact** | **If Yes, How Significant is the Impact?** |
| **1** | **Energy** (usage, demand and generation) | Does the activity/proposal impact energy demand, use and provision? | Yes - positive | Works carried out to private properties may result in more energy efficiencies within private properties | Negligible |
| **2** | **Water** (quality, demand, use and disposal) | Does the activity/proposal impact on the sustainable use, management and conservation of water? | Yes - positive | Works carried out to private properties may result in more sustainable use of water within private properties | Negligible |
| **3** | **Environmental Good Stewardship** (air and soil quality, noise and light pollution) | Does the activity/proposal result in any emissions to air, soil and/or water?  Does the activity/proposal impact air quality or noise and light pollution? | No | No impact on air and soil quality, noise and light pollution. | Neutral/ No Impact |
| **4** | **Waste** (total volume, end of life disposal and recycling, resource use and product consumption) | Does the activity/proposal impact waste generation or disposal methods? | Yes – negative | Where works are carried out by private owners, landlords and tenants, there may be requirement to remove and dispose of existing components within the home during replacement. | Negligible |
| **5** | **Active Travel and Sustainable Transport** (walking, wheeling, cycling) | Does the activity/proposal impact the use of fossil fuelled vehicles and the provision of low carbon travel opportunities in communities? | No |  | Neutral/ No Impact |
| **6** | **Transport** (Fleet) | Does the activity/proposal impact the use of council-owned fleet/ staff travel? | No |  | Neutral/ No Impact |
| **7** | **Communities** (resilience, awareness, communication, skills) | Does this activity help build awareness, willingness, and skills in our communities to address climate change? | Yes - positive | Works carried out to private properties may result in more energy efficiencies within private properties | Negligible |
| **8** | **Reduced Inequalities and Social Justice** (poverty, inclusion, cost of living, fair work) | Does the proposal build capacity to identify and tackle poverty and exclusion? Does the proposal improve quality of life? | Yes - positive | Assistance available may tackle energy poverty, and the ability for owners and private tenants to remain at home. | Moderate Beneficial |
| **9** | **Services** (demand and use) | Does the proposal or activity increase overall consumption of services or decreasing them? | Yes – positive | The service is available to any home owner, landlord or private tenant who wishes to access the service. | Minor Beneficial. |
| **10** | **Procurement/ Supply Chain** (for example purchased goods and services, contractor and sub-contractor activities, local supply chain, SMEs, community wealth building) | Does the activity/proposal increase consumption of resources? Does the activity/proposal impact local supply chains and local spend? Are there opportunities for local employment? | No | Anyone who accesses the services will appoint their own contractors, therefore this does not have an impact on the council’s procurement activities. | Neutral/ No Impact |
| **11** | **Land Use and Land Use Change** | Does the activity/proposal alter or change the function of land and/or impact on peatland or vacant and derelict land? | No | The statement impacts on existing homes, not land nor change of use of the home | Neutral/No impact |
| **12** | **Nature/ Biodiversity** (protection, restoration and enhancement) | Does the activity/proposal impact on the protection, enhancement and restoration of biodiversity and nature? | No |  | Neutral/ No Impact |
| **13** | **Health and Wellbeing** (physical, mental and social) | Does the proposal promote and support improved social, physical and mental wellbeing? | Yes - positive | Works to house condition will have a positive impact on residents. Adaptions will have a positive impact allowing residents to remain at home longer. | Moderate Beneficial |
| **14** | **Extreme weather/ climate events** (drought, flooding, heat, storms) | Does the activity/proposal impact on resilience of both South Lanarkshire Council and communities to extreme weather events (flooding, drought, wildfires, storms)? | No | Works carried out by owners should not impact on these events. | Neutral/ No Impact |
| **15** | **Greenhouse Gas Emissions** (increase or decrease in emissions)  If assessment level is considered to be major or minor adverse (for example there’s a significant or minor increase in greenhouse gas emissions),go to next section and complete the carbon impact assessment. | Does the activity/proposal impact on greenhouse gas emissions? | Yes - positive | Works carried out to private properties may result in more energy efficiencies within private properties | Negligible |

**Sustainability Impact Assessment for Capital Project Submissions**

As an organisation the council has a duty to understand the carbon impact of our activities. The council has a statutory responsibility to act in a sustainable way and contribute to emission reduction targets. The council must where possible avoid increasing emissions through its daily activities, projects and policies.

**This section is only required for Capital Project proposals. If the assessment does not relate to a Capital Project proposal, then move to** [**section 8**](#_Section_8_–)**.**

**Step 1:** Has the project been subject to a previous Environmental Impact Assessment (EIA) or Strategic Environmental Assessment (SEA)?

|  |  |
| --- | --- |
| **EIA OR SEA** | |
| **Have the details of your report been directly subject to an Environmental or Strategic Environmental Impact Assessment previously?** | **If yes**, please add a short outline of the EIA/SEA below and continue with the following carbon impact assessment.  While the scheme of assistance statement has not been subject to a previous EIA or SEA, as part of the development of the Local Housing Strategy 2022-27 a full Strategic Environmental Assessment (SEA) was undertaken with the report submitted to the SEA Gateway and published online for consultation.  This assessment identified that the LHS would make an overall positive contribution toward local and national net-zero and decarbonisation targets through the direction of improvements to domestic buildings across South Lanarkshire.  The full Environmental Report developed through the SEA is available to review on the council’s website at [www.southlanarkshire.gov.uk](http://www.southlanarkshire.gov.uk).  **If no**, please complete the following impact assessment.  Not applicable. |

## Armed Forces Covenant Duty

The [Armed Forces Act 2021](https://www.legislation.gov.uk/ukpga/2021/35/contents/enacted) now places a legal duty (the **Armed Forces Covenant Duty**) on specified public bodies, including the council and the IJB. This duty is to have due regard to the principles of the [Armed Forces Covenant](https://www.gov.uk/government/collections/armed-forces-covenant-supporting-information) when exercising certain statutory functions in the areas of healthcare, education and housing. The Armed Forces Covenant Duty came into effect on 22 November 2022. The Covenant is, essentially, a promise that the armed forces community will be treated fairly and face no disadvantage when accessing public and commercial services, with special provision made in appropriate cases.

### **8.1 Consider what impact this proposal could have on the Armed Forces Community, is the Armed Forces Covenant Duty engaged?**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  | **What is the impact?** | | | | |
|  | **Negative** | | | **Neutral** | **Positive** |
| **Armed Forces Covenant Duty** | **High** | **Medium** | **Low** |  |  |
| Housing |  |  |  |  | X |
| Education |  |  |  | X |  |
| [Healthcare](https://www.equalityhumanrights.com/equality/equality-act-2010/your-rights-under-equality-act-2010/disability-discrimination) |  |  |  | X |  |

### **8.2 How will the policy impact the Armed Forces Community?**

|  |
| --- |
| It is considered that the revised scheme of assistance should have a positive impact on the Armed Forces Community where they request help through the scheme. |

### **8.3 What considerations have been made in reaching the above assessment?**

|  |
| --- |
| **What internal or external data has been considered? What does this data tell us?** |
| The revised scheme of assistance is available to assist all residents with Armed Forces status to apply for help with maintenance, repair and carrying out adaptations to their homes, should they request assistance. |
| **What consultation and engagement has been undertaken with officers and partner organisations?** |
| Engagement with partner organisations relating to current and previous members of the armed forces was conducted as part of the development of the Local Housing Strategy 2022-27, which sets out the strategic approach to housing across South Lanarkshire. |
| **What consultation and engagement has been undertaken with people who may be impacted by this policy (for example citizens, community groups, or other people/groups)?** |
| Engagement with partner organisations relating to current and previous members of the armed forces was conducted as part of the development of the Local Housing Strategy 2022-27, which sets out the strategic approach to housing across South Lanarkshire. |

### **8.4 What mitigations can be put in place?**

|  |  |  |
| --- | --- | --- |
| **What mitigations are there against any negative impacts (if applicable)?** | | |
| Not applicable. | | |
| **With mitigations in place, what is the new overall rating of the negative impact(s)?** | High |  |
| Medium |  |
| Low |  |
| Negative Impact Removed |  |

## Sign Off

|  |
| --- |
| **Any further positive or negative impacts on individuals or groups that have been considered?** |
| Not applicable |
| **Overall summary of changes made as a result of impact assessment.** |
| Not applicable |
| **Outline of how impact of policy will be monitored.** |
| The scheme will be monitored as part of the annual policy review schedule to Housing and Technical Resources Committee, with the next scheduled updated in autumn 2025. The Housing and Technical Services Review Schedule requires that a review of the Scheme of Assistance is carried out 5 yearly. The next review till therefore take place 2029/30, unless material legal, resource, or other changes are required to be made, and will be subject to approval by the Housing and Technical Resources Committee. |
| **If there are any remaining negative impacts after mitigation, what is the justification for why this policy should proceed.** |
|  |

|  |  |
| --- | --- |
| **Assessment Author** |  |
| **Version** | 4 |
| **Date** | 8 April 2025 |
| **Other Officers/Partners involved in the assessment** |  |
| **Lead Officer** |  |
| **Was this IIA reviewed by the IIA Review Panel?** |  |
| **Approved by** | Craig Jardine, Head of Property Services |
| **Date** | 14 April 2025 |

If you need this information in another language or format, please contact us to discuss how we can best meet your needs. Phone 0303 123 1015 or email [equalities@southlanarkshire.gov.uk](mailto:equalities@southlanarkshire.gov.uk).