




## Integrated Impact Assessment (IIA)

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### Stage 1 Scoping and Assessing for Relevance

#### Section 1 Details of the Proposal

<b>A. Title of Proposal:</b>	Penumbra Housing Support Contract – reduction of weekly purchased hours.
<b>B. What is it?</b>	A reduction in weekly purchased hours from 151 to 135 within the Penumbra Housing Support Contract from 1 <sup>st</sup> April 2025.
<b>C. Description of the proposal:</b> (Set out a clear understanding of the purpose of the proposal being developed or reviewed (what are the aims, objectives and intended outcomes, including the context within which it will operate))	<ul style="list-style-type: none"> <li>• The current Penumbra Housing Support contract to 31<sup>st</sup> March 2025 guarantees the purchase of 151 hours per week at a rate of £20.69 per hour.</li> <li>• From April to September 2024, quarterly monitoring reports indicated that the full 151 weekly hours were not being utilized, with an average usage of 130 hours per week.</li> <li>• It is proposed to reduce the weekly purchased hours within the Penumbra Housing Support contract from 151 hours per week to 135 hours per week, effective 1<sup>st</sup> April, 2025. This adjustment represents a 10% saving and aligns the service with current demand for support hours.</li> <li>• The Penumbra team provides practical support to service users experiencing homelessness. The support is tailored to each individual's circumstances, aiming to prevent homelessness and assist the service user in finding and resettling in a new home.</li> <li>• Service Costs: The current annual cost of the service is £155,000. The proposed reduction in weekly hours would result in a £15,000 saving, reducing the annual cost to £140,000.</li> </ul> <p>In preparing this impact assessment this is the data and desktop research that has been considered.</p>

	<ul style="list-style-type: none"> <li>• <u>Scottish Governments: Homelessness in Scotland Statistics</u> – Uses data provided by all Local Authorities on an agreed National framework. Data publications collate the data to provide national and some localised data that includes information on; reasons for homelessness, homeless applications, homeless prevention activities housing outcomes, equalities, temporary accommodation and support requirements. <a href="https://www.gov.scot/collections/homelessness-statistics/">https://www.gov.scot/collections/homelessness-statistics/</a></li> <li>• <u>Scottish Government: Homelessness In Scotland: Equalities Breakdown</u> <a href="https://www.gov.scot/publications/homelessness-scotland-equalities-breakdown-2019-20/">https://www.gov.scot/publications/homelessness-scotland-equalities-breakdown-2019-20/</a></li> <li>• <u>The Updated Ending Homelessness Together action plan</u> – outlines how national government, local government and third sector partners will work together on their shared ambition to end homelessness. It has been revised to reflect actions needed in response to the global coronavirus pandemic. <a href="https://www.gov.scot/publications/ending-homelessness-together-updated-action-plan-october-2020/">https://www.gov.scot/publications/ending-homelessness-together-updated-action-plan-october-2020/</a></li> <li>• Attached below, for information, are the Q2 &amp; Q3 Monitoring reports and current Business Continuity plan.</li> </ul> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;">         Penumbra%20Monitoring%20Report.doc     </div> <div style="text-align: center;">         ~WRO3536.doc     </div> <div style="text-align: center;">         Penumbra%203rd%20Qtr%20Monitoring.doc     </div> </div>
<b>D. Service Area:</b>	Homelessness Services
<b>Department:</b>	
<b>E. Lead Officer:</b> (Name and job title)	Sharron Elsdon – Homelessness Manager
<b>F. Other Officers/Partners involved:</b> (List names, job titles and organisations)	

<b>G. Date(s) IIA completed:</b>	29.01.2025

## 2 Will there be any cumulative impacts as a result of the relationship between this proposal and other policies?

Yes

If yes, - please state here:

Operating procedures, including

- Homelessness internal Housing Support delivery.

### HOMELESSNESS INTERNAL HOUSING SUPPORT SERVICE

- The majority of households experiencing homelessness have no, low or medium support needs, moving into mainstream housing with day-to-day housing management advice, housing support or other referral services.
- The homelessness housing support service offers short term services to individuals/households in critical need, who are homeless or at risk of losing their tenancy. The delivery of our housing support service is through a commissioned service which is the subject of this IIA and an internal team within homeless services. Housing Support officers support people to secure, establish, manage, and maintain their accommodation.
- Homelessness housing support service is delivered within strategic partnerships with other agencies to provide coordinated flexible support to individuals.

## 3 Legislative Requirements

### 3.1 Relevance to the Equality Duty:

**Do you believe your proposal has any relevance under the Equality Act 2010?**

*(If you believe that your proposal may have some relevance – however small please indicate yes. If there is no effect, please enter “No” and go to Section 3.2.)*

Equality Duty	Reasoning:
<b>Elimination of discrimination (both direct &amp; indirect), victimisation and harassment.</b> <i>(Will the proposal discriminate? Or help eliminate discrimination?)</i>	<p>Positive impact.</p> <p>The homelessness housing support service offers support services to individuals/households in critical need, who are homeless or at risk of losing their tenancy. The delivery of our housing support service is through a commissioned service and an internal team within homeless services. Housing Support officers support people to secure, establish, manage, and maintain their accommodation. Regardless of an individual's protective characteristic, policy and service provision is offered fairly and in a non-discriminatory way in order to meet their requirements.</p>
<b>Promotion of equality of opportunity?</b> <i>(Will your proposal help or hinder the Council with this)</i>	<p>Positive impact.</p> <p>Aligning support services with current demand will enhance service quality, cost-effectiveness, and alignment with strategic objectives. This approach will increase focus on quality standards, enable close performance monitoring, and ensure that service levels meet or exceed expectations. Additionally, it will promote organizational resilience and sustainability, as well as enhance staff knowledge, retention, and expertise within homeless services.</p> <p>This strategy will also identify and promote equality of opportunity by improving service provision, availability, and quality to prevent homelessness whenever possible, and by responding quickly with high-quality services when homelessness is unavoidable.</p>
<b>Foster good relations?</b> <i>(Will your proposal help or hinder the council's relationships with those who have equality characteristics?)</i>	<p>Positive impact.</p> <p>The homelessness housing support service is delivered within strategic partnerships with other agencies to provide coordinated flexible support to individuals. This proposal will build on those already well-established partnerships.</p>

<b>3.2 Which groups of people do you think will be or potentially could be, impacted by the implementation of this proposal?</b> <b>(You should consider employees, clients, customers / service users, and any other relevant groups)</b>				
<p><b>Preliminary note</b> – The homeless service aims to improve outcomes to all those who become threatened with homelessness or who become homeless, regardless of their protected characteristics. Housing options are always agreed (or agreed as quickly as possible) to prevent homelessness for the groups who are predictably at highest risk of homelessness.</p> <p>Irrespective of an individuals protected characteristics the service is delivered in a fair and equitable manner, however where there are specific considerations these are indicated below.</p> <p>Please tick below as appropriate, outlining any potential impacts on the undernoted equality groups this proposal may have and how you know this.</p>				
	Impact			Please explain the potential impacts and how you know this
	No Impact	Positive Impact	Negative Impact	
<b>Age</b> Older or younger people or a specific age grouping		<b>x</b>		<p>The Rapid Rehousing Transition Plan(RRTP) aims to improve services to all those who become threatened with homeless or who become homeless, regardless of age. The RRTP requires that pathway plans are always agreed (or agreed as quickly as possible) to prevent homelessness for the groups who are predictably at highest risk of homelessness including people with experience of the care system, and older people.</p> <p>Monitoring age groups forms part of the RRTP performance framework.</p> <p>The following documents have key in informing actions:</p> <ul style="list-style-type: none"> <li>• A Way Home Scotland, Youth Homelessness Prevention Pathway: For all young people published in March 2021.</li> <li>• <a href="https://www.awayhomescotland.org/wp-content/uploads/sites/13/2021/03/YHPP-for-All-Young-People-1.pdf">https://www.awayhomescotland.org/wp-content/uploads/sites/13/2021/03/YHPP-for-All-Young-People-1.pdf</a></li> <li>• The Housing Needs and Aspirations of Young People – Scottish Borders 5 Year Action Plan <a href="https://www.scotborders.gov.uk/downloads/download/1166/young_peoples_housing_needs">https://www.scotborders.gov.uk/downloads/download/1166/young_peoples_housing_needs</a></li> </ul>

				<ul style="list-style-type: none"> <li>Homelessness In Scotland Equalities Breakdown 2019 to 2020 <a href="https://www.gov.scot/publications/homelessness-scotland-equalities-breakdown-2019-20/">https://www.gov.scot/publications/homelessness-scotland-equalities-breakdown-2019-20/</a></li> <li>Integrated Strategic Plan for Older People's Housing, Care and Support Needs 2018-28</li> <li>Integrated Strategic Plan for Older People's Housing Care and Support 2018-28   Scottish Borders Council (<a href="http://scotborders.gov.uk">scotborders.gov.uk</a>)</li> </ul>
<b>Disability</b> e.g. Effects on people with mental, physical, sensory impairment, learning disability, visible/invisible, progressive or recurring		<b>x</b>	<b>x</b>	<p>The RRTP aims to improve services to all those who become threatened with homeless or who become homeless, regardless of disability. The RRTP is an integral part of the Local Housing Strategy and Strategic Housing Investment Plan (SHIP).</p> <p>Universal Health Assessment informs the allocation policy arrangements within Scottish Borders Registered Social Landlord's. The process allows for assessment of a persons health needs to inform their housing requirements and awards priority for housing if required.</p> <p>The Scottish Government data frameworks do not currently include some areas of equalities data including disabilities. During a recent consultation on the national framework Scottish Borders Council highlighted this as a gap in evidence.</p>
<b>Gender Reassignment Trans/Transgender Identity</b> anybody whose gender identity or gender expression is different to the sex assigned to them at birth		<b>x</b>	<b>x</b>	<p>There is a need to develop the evidence base for the incidence of homelessness amongst, and impact of services on, transgender/transgender identity.</p> <p>The Scottish Government data frameworks do not currently include some areas of equalities data including Gender Reassignment, Trans/Transgender identity. The Scottish Government are undertaking a data review, gender reassignment has been highlighted as a gap in the current data collections.</p>
<b>Pregnancy and Maternity</b> (refers to the period after the birth, and is linked to <b>maternity</b> leave in the employment context. In the non-work		<b>x</b>	<b>x</b>	<p>The RRTP aims to improve services to all those who become threatened with homeless or who become homeless, regardless of pregnancy and maternity status.</p> <p>Pregnant household members are monitored as part of the homeless monitoring framework.</p>

context, <b>protection</b> against <b>maternity</b> discrimination is for 26 weeks after giving birth),				The Scottish Government data frameworks do not currently include some areas of equalities data including Maternity. The Scottish Government are undertaking a data review, maternity has been highlighted this as a gap in the current data collections.
<b>Race Groups:</b> including colour, nationality, ethnic origins, including minorities (e.g. gypsy travellers, refugees, migrants and asylum seekers)		<b>x</b>		<p>The RRTP aims to improve services to all those who become threatened with homeless or who become homeless, regardless of race. The RRTP requires that pathway plans are always agreed (or agreed as quickly as possible) to prevent homelessness for the groups who are predictably at highest risk of homelessness including groups with particular needs such as migrants and Gypsy Travellers.</p> <p>In 2023/2024 673 homeless applications received a statutory homeless decision of 'unintentionally' 'homeless' or 'threatened with homelessness'.</p> <ul style="list-style-type: none"> <li>• 530 applicants identified as being from a white ethnic group.</li> <li>• 16 applicants identified as being from a Black or Minority Ethnic group.</li> <li>• The ethnicity was not known in 4 applications.</li> <li>• 2 applicants identified as 'other'.</li> </ul>
<b>Religion or Belief:</b> different beliefs, customs (including atheists and those with no aligned belief)		<b>x</b>	<b>x</b>	<p>The RRTP aims to improve services to all those who become threatened with homeless or who become homeless, regardless of religion or other beliefs. Evidence regarding the religion or other beliefs of people who become threatened with homeless or who become homeless is not collected.</p> <p>The Scottish Government are undertaking a data review, Religion or belief has been highlighted this as a gap in the current data collections.</p>
<b>Sex – Gender Identity</b> women and men (girls and boys) and those who self-identify their gender		<b>x</b>	<b>x</b>	The RRTP aims to improve services to all those who become threatened with homeless or who become homeless, regardless of gender. The RRTP requires that pathway plans are always agreed (or agreed as quickly as possible) to prevent homelessness for the groups who are predictably at highest risk of homelessness including groups with particular needs such as those who have experienced domestic violence.



				<p>The RRTP seeks to build on existing local joint pathway arrangements including the Safer Housing Options Service, MARAC (Multi-Agency Risk Assessment Conference arrangements), and CEDAR (Children Experiencing Domestic Abuse Recovery) services for victims of domestic abuse.</p> <p>The Scottish Government are undertaking a data review, gender identity has been highlighted this as a gap in the current data collections.</p>
<b>Sexual Orientation,</b> e.g. Lesbian, Gay, Bisexual, Heterosexual		<b>x</b>	<b>x</b>	<p>The RRTP aims to improve services to all those who become threatened with homeless or who become homeless, regardless of sexual orientation.</p> <p>There is a need to develop the evidence base for the incidence of homelessness amongst, and impact services have on people from the LGBT community. The Scottish Government data frameworks do not currently include some areas of equalities data Sexual Orientation. The Scottish Government are undertaking a data review, sexual orientation has been highlighted this as a gap in the current data collections.</p>
<b>3.3 Fairer Scotland Duty</b> This duty places a legal responsibility on Scottish Borders Council (SBC) to actively consider (give due regard) how we can reduce inequalities of outcome caused by socioeconomic disadvantage when making strategic decisions.  The duty is set at a strategic level - these are the key, high level decisions that SBC will take. This would normally include strategy documents, decisions about setting priorities, allocating resources and commissioning services.				
<b>Is the proposal strategic?</b>  No  <b>If No go to Section 4</b>				
<b>If yes, please indicate any potential impact on the undernoted groups this proposal may have and how you know this:</b>				
	<b>Impact</b>		<b>State here how you know this</b>	

	No Impact	Positive Impact	Negative Impact	
<b>Low and/or No Wealth</b> – 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.				
<b>Material Deprivation</b> – 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				
<b>Area Deprivation</b> – where you live (e.g. rural areas), where you work (e.g. accessibility of transport)				
<b>Socio-economic Background</b> – social class i.e. parents' education, employment and income				

<b>Looked after and accommodated children and young people</b>				
<b>Carers</b> paid and unpaid including family members				
<b>Homelessness</b>				
<b>Addictions and substance use</b>				
<b>Those involved within the criminal justice system</b>				

<b>3.4 Armed Forces Covenant Duty (<i>Education and Housing/ Homelessness proposals only</i>)</b>	
<p>This duty places a legal responsibility on Scottish Borders Council (SBC) to actively consider (give due regard) to the three matters listed below in Education and Housing / Homelessness matters.</p> <p>This relates to current and former armed forces personnel (regular or reserve) and their families.</p> <p><b>Is the Armed Forces Covenant Duty applicable?</b></p> <p><b>No</b></p> <p>If “Yes”, please complete below</p>	
<b>Covenant Duty</b>	<b>How this has been considered and any specific provision made:</b>
<b>The unique obligations of, and sacrifices made by, the armed forces;</b>	

The principle that it is desirable to remove disadvantages arising for Service people from membership, or former membership, of the armed forces;	
The principle that special provision for Service people may be justified by the effects on such people of membership, or former membership, of the armed forces.	

## Section 4 Full Integrated Impact Assessment Required

*Select No if you have answered “No” to all of Sections 3.1 – 3.3.*

**No**

If yes, please proceed to Stage 2 and complete a full Integrated Impact Assessment

**If a full impact assessment is not required briefly explain why there are no effects and provide justification for the decision.**

The Rapid Rehousing Transition Plan is the strategic document for the delivery of homelessness services in the Scottish Borders of which Housing Support is a component, supported by the Local Housing Strategy 2023-2028 which supports the actions to deliver the proposals. The RRTP has been subject to a full Integrated Impact Assessment. The RRTP is monitored by the Borders Homelessness and Health Strategic partnership. This ensures that areas that require further action are identified and addressed as part of this process.

<b>Signed by Lead Officer:</b>	<b>Sharron Elsdon</b>
<b>Designation:</b>	<b>Homelessness Manager</b>
<b>Date:</b>	<b>29.01.2025</b>
<b>Counter Signature Director:</b>	
<b>Date:</b>	