

Integrated Impact Assessment – Summary Report

Each of the numbered sections below must be completed
Please state if the IIA is interim or final – **Updated interim**

1. Title of proposal

Allocations Policy Suspension Update and Costed Plan to Meet Homelessness Demand

2. What will change as a result of this proposal?

The request is to suspend the Council House Letting Policy, other than for people who have been awarded Gold / Urgent Gold priority or those awaiting discharge from hospital, until the Council is compliant with both:

- The Housing Scotland Act 1987 (as amended); and
- The Homeless Persons (Unsuitable Accommodation) (Scotland) Order 2014.

3. Briefly describe public involvement in this proposal to date and planned

As noted in section 10 of this document there have been various communications with tenants and partner agencies. Following Committee, the website will be updated and partner agencies updated.

4. Is the proposal considered strategic under the Fairer Scotland Duty?

Yes

5. Date of IIA

Original - 16 April 2025

Update 1 - 11 August 2025

Update 2 – 19 November 2025

6. Who was present at the IIA? Identify facilitator, lead officer, report writer and any employee representative present and main stakeholder (e.g. Council, NHS)

Name	Job Title
Derek McGowan	Service Director – Housing and Homelessness
Debbie Herbertson	Homelessness Services Manager
Jill Thomson	Housing and Homelessness Strategy Manager
Nicky Brown	Head of Homelessness and Housing Access
Sarah Burns	Head of Housing Services
Lisa Mallon	Head of Strategy, Commissioning and Service Improvement
Lucy Pearson	Lead Officer - Equalities

7. Evidence available at the time of the IIA

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
Data on populations in need	EdIndex Housing Register	<p><u>Groups on EdIndex – change in open applications</u></p> <p>Applicants on EdIndex</p> <p>Total number of applicants on EdIndex 26,816 (March 2025)</p> <p>Total number of applicants on EdIndex 28,029 (August 2025) - increase from March</p> <p>Total number of applicants on EdIndex 28,835 (November 2025) – increase from August</p> <p>Gold priority</p> <p>Total number awarded gold priority 463 (March 2025)</p> <p>Total number awarded gold priority 443 (August 2025) - decrease from March</p> <p>Total number awarded gold priority 426 (November 2025) – decrease from August</p> <p>Silver – Homeless priority</p> <p>Total number with Silver – Homeless priority 7,473 (March 2025)</p> <p>Total number with Silver – Homeless priority 7,758 (August 2025) - increase from March</p> <p>Total number with Silver – Homeless priority 8,134 (November 2025) – increase from August</p> <p>Demolition/Officers Panel priority</p> <p>Total number with Demo and Officer Panel priority 227 (March 2025)</p> <p>Total number with Demo and Officer Panel (Exceptional Housing Need) priority 228 (August 2025) - increase from March</p> <p>Total number with Demo and Officer Panel priority 229 (November 2025) – increase from August</p> <p>Overcrowding priority</p> <p>Total number with Overcrowding priority 1,129 (March 2025)</p> <p>Total number with Overcrowding priority 1,202 (August 2025) - increase from March</p>

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Total number with Overcrowding priority 1,213 (November 2025) – increase from August

Underoccupation priority

Total number with Under-occupation priority 166 (March 2025)

Total number with Under-occupation priority 164 (August 2025) - decrease from March

Total number with Under-occupation priority 161 (November 2025) – decrease from August

Waiting time points only

Total number of applicants with waiting time points only 17,358 (March 2025)

Total number of applicants with waiting time points only 18,234 (August 2025) – increase from March

Total number of applicants with waiting time points only 18,661 (November 2025)

Groups on EdIndex – change in open applications

31 March 2025

Choice Priority Group	Number of applications at 31/03/2025 00:00:00	Percentage
1. Gold	463	1.73 %
2a. Silver - Homeless	7473	27.87 %
2b. Demo & Officer Panel	227	0.85 %
2c. Overcrowding	1129	4.21 %
2d. Underoccupation	166	0.62 %
3. Waiting Time	17358	64.73 %
Sum:	26816	

11 August 2025

Evidence

Available – detail source

Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal

Choice Priority Group	Number of applications at 11/08/2025 00:00:00	Percentage
1. Gold	443	1.58 %
2a. Silver - Homeless	7758	27.68 %
2b. Demo & Officer Panel	228	0.81 %
2c. Overcrowding	1202	4.29 %
2d. Underoccupation	164	0.59 %
3. Waiting Time	18234	65.06 %
Sum:	28029	

19 November 2025

Choice Priority Group	Number of applications at 19/11/2025 00:00:00	Percentage
1. Gold	426	1.48%
2a. Silver - Homeless	8134	28.21%
2b. Demo & Officer Panel	229	0.79%
2c. Overcrowding	1213	4.21%
2d. Underoccupation	161	0.56%
3. Waiting Time	18661	64.72%
Sum:	28835	

Bids received on EdIndex and lets to groups

In 2024/25 the average number of bids for social rented homes advertised for let on EdIndex is 243 (CEC), All EdIndex landlords 291 (1 April 2024 – 31 March 2025).

The average number of bids placed prior to the suspension was 296 per property from April 2024 to October 2024, from an average of 180 properties advertised each month.

During the first suspension, from 13 November 2024 to 7 January 2025, this rose to an average of 450 bids per property from an average of 84 properties per month being advertised during this period.

This fell once lettings resumed later in January 2025 to an average of 295 bids per property, which is in line with pre-suspension figures, and has since increased to an average of 355 bids per property in May 2025, following the second suspension which took place in April 2025.

Following the suspension in April 2025, there have been less properties advertised per month compared to pre-suspension. From May 2024 to September 2024, there were an average of 181 properties advertised each month, however, this has reduced to an

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	<p>Homelessness presentations</p> <hr/> <p>Homelessness journey times</p>	<p>average of 102 properties advertised between May 2025 and September 2025. With fewer properties being available, this has increased the demand, resulting in an average of 399 bids being received for each property during this period.</p> <p>The number of lets between May 2024 to September 2024 was 879 between all EdIndex landlords. This fell to 676 in the same period in 2025, meaning a reduction in 203 homes for applicants to move to. This has led to more open EdIndex applications aside from any incoming demand.</p> <p>Despite the suspension, a range of households with varying priorities have been let a property. The table below breaks down the 676 lets to the different priority groups</p> <table border="1" data-bbox="587 862 1452 1176"> <thead> <tr> <th></th> <th>May-25</th> <th>Jun-25</th> <th>Jul-25</th> <th>Aug-25</th> <th>Sep-25</th> </tr> </thead> <tbody> <tr> <td>Gold</td> <td>20</td> <td>12</td> <td>21</td> <td>13</td> <td>16</td> </tr> <tr> <td>Silver - Homeless</td> <td>105</td> <td>79</td> <td>86</td> <td>63</td> <td>80</td> </tr> <tr> <td>Officers Panel</td> <td>16</td> <td>9</td> <td>11</td> <td>7</td> <td>13</td> </tr> <tr> <td>Overcrowding</td> <td>5</td> <td>4</td> <td>2</td> <td>6</td> <td>10</td> </tr> <tr> <td>Undercrowding</td> <td>1</td> <td>0</td> <td>1</td> <td>3</td> <td>2</td> </tr> <tr> <td>Waiting time</td> <td>13</td> <td>9</td> <td>18</td> <td>23</td> <td>28</td> </tr> <tr> <td>Sum</td> <td>160</td> <td>113</td> <td>139</td> <td>115</td> <td>149</td> </tr> </tbody> </table> <hr/> <p>This is in line with previous IIAs which were submitted at the time of the suspensions, which identify the risk of longer waiting times.</p> <p>The data suggests that the suspension has had an impact with an increased average number of bids per property due to a lower amount of properties being available. This indicates that bidding for permanent accommodation for all applicants on EdIndex has been more competitive.</p> <hr/> <p>2024/25 – 3,817 April 2025 – October 2025 – 2,464</p> <p>2024/25 5,260 households / 10,400 people in temporary accommodation, most of who required social housing</p> <p>November 2025 6,032 households / 11,580 people in temporary accommodation, most of who required social housing</p>		May-25	Jun-25	Jul-25	Aug-25	Sep-25	Gold	20	12	21	13	16	Silver - Homeless	105	79	86	63	80	Officers Panel	16	9	11	7	13	Overcrowding	5	4	2	6	10	Undercrowding	1	0	1	3	2	Waiting time	13	9	18	23	28	Sum	160	113	139	115	149
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		<p>Homelessness case length in 2024/25 was 629.0 days / 779.0 days to be housed</p> <p>Homelessness case length Apr 2025 – Oct 2025 – 603.6 days / 697.6 days to be housed (this is measured at case closure).</p> <p>Average time in Temporary Accommodation for 2024/25 was 378.7 days for all households (inc. advice only) / 447.7 days households assessed as homeless.</p> <p>Average time in Temporary Accommodation for 2025/26 so far is 384.6 days for all households (inc. advice only) / 479.2 days households assessed as homeless.</p>																					
Data on service uptake/access	<p>Cause of homelessness</p> <hr/> <p>Homelessness demographics</p>	<p>2024/25</p> <p>Household dispute (non-violent) 45.2%</p> <p>Landlord Termination 19.5%</p> <p>Household dispute (violent/abusive) 11.0%</p> <p>April 2025 – September 2025</p> <p>Household dispute (non-violent) 42%</p> <p>Landlord Termination 16.1%</p> <p>Household dispute (violent/abusive) 10.6%</p> <hr/> <p>2024/25 – 45.0% of households have one or more support needs</p> <p>April 2025 – October 2025 42.8 % of households have one or more support needs.</p> <p>The support needs of households presenting as homeless includes:</p> <table border="1" data-bbox="574 1523 1564 1780"> <thead> <tr> <th>Support need</th> <th>2024/25</th> <th>April 2025 – October 2025</th> </tr> </thead> <tbody> <tr> <td>Mental health</td> <td>35.0%</td> <td>31.0%</td> </tr> <tr> <td>Learning disability</td> <td>5.7%</td> <td>5.5%</td> </tr> <tr> <td>Physical disability</td> <td>7.9%</td> <td>10.1%</td> </tr> <tr> <td>Medical condition</td> <td>12.1%</td> <td>12.3%</td> </tr> <tr> <td>Drug or alcohol dependency</td> <td>7.4%</td> <td>7.8%</td> </tr> <tr> <td>Basic housing management / independent living skills</td> <td>7.2%</td> <td>8.7%</td> </tr> </tbody> </table>	Support need	2024/25	April 2025 – October 2025	Mental health	35.0%	31.0%	Learning disability	5.7%	5.5%	Physical disability	7.9%	10.1%	Medical condition	12.1%	12.3%	Drug or alcohol dependency	7.4%	7.8%	Basic housing management / independent living skills	7.2%	8.7%
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Data on socio-economic disadvantage e.g. low income, low wealth, material	Cause of homelessness / homelessness demographics	<p>As above</p> <p>8,865 open homeless cases with statutory rights to temporary accommodation and settled housing 1 in 5 children in Edinburgh experience poverty, with a clear, established link between areas</p>																					

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deprivation, area deprivation		<p>identified as multiply deprived through Scottish Indices of Multiple Deprivation, social housing and poverty.</p> <p>The following types of family are identified by Scottish Government as being more likely to be living in poverty: lone parent families; minority ethnic families; families with a disabled adult or child; families with a younger mother; families with a child under one; families with three or more children (Ref: https://www.gov.scot/publications/tackling-child-poverty-priority-families-overview/pages/introduction/)</p> <p>Homelessness In 2021/22, 9.9% of main applicants for homelessness support declared an ethnicity that was not White, the highest proportion on record (Scottish Government, 2022).</p> <p>In 2024/25 40.4% of main applicants for homelessness support declared an ethnicity that was not White (CEC internal data).</p> <ul style="list-style-type: none"> For some ethnic groups, the proportion of main applicants in 2018/19 and 2021/22 was higher than estimates of those populations in the 2019 Scottish Household Survey (Scottish Government, 2020), suggesting they may be over-represented in applications. This assessment is corroborated by the findings of a review of ethnicity and homelessness conducted by the Coalition for Racial Equality and Rights (CRER), which show that Black and minority ethnic people are disproportionately represented within homelessness applications and assessments (CRER, 2023). <p>Homelessness</p> <ul style="list-style-type: none"> In 2024/25, just over half of those assessed as homeless (55%) had at least one support need relating to: a mental health problem (35%), a learning disability (5.7%), a physical disability (7.9%), a medical condition (12.1%), drug or alcohol dependency (7.4%) or independent living skills (7.2%) (CEC internal data). <p>Children’s rights</p> <p>ECHR Article 27 (adequate standard of living) states that every child has the right to a standard of living that is good enough to meet their physical and social needs and support their development. Governments must help families who cannot afford to provide this.</p>

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Data on equality outcomes	Equality data for EdIndex registrations	<p><u>Ethnic origin, sex and choice groups</u></p> <p>Data at 31 March 2025</p> <p>(a) Ethnic origin</p> <table border="1" data-bbox="614 481 1532 1355"> <thead> <tr> <th>Ethnicity</th> <th>Number of applications at 31/03/2025 00:00:00</th> <th>Percentage</th> </tr> </thead> <tbody> <tr><td>African: Other</td><td>390</td><td>1.45 %</td></tr> <tr><td>Asian, Asian Scottish/British:Bangladesh</td><td>194</td><td>0.72 %</td></tr> <tr><td>Asian, Asian Scottish/British:Chinese</td><td>111</td><td>0.41 %</td></tr> <tr><td>Asian, Asian Scottish/British:Indian</td><td>163</td><td>0.61 %</td></tr> <tr><td>Asian, Asian Scottish/British:Other</td><td>311</td><td>1.16 %</td></tr> <tr><td>Asian, Asian Scottish/British:Pakistani</td><td>459</td><td>1.71 %</td></tr> <tr><td>Black,Black Scottish/British</td><td>116</td><td>0.43 %</td></tr> <tr><td>Black,Black Scottish/British:African</td><td>1322</td><td>4.93 %</td></tr> <tr><td>Black,Black Scottish/British:Caribbean</td><td>94</td><td>0.35 %</td></tr> <tr><td>Gypsy - Traveller</td><td>36</td><td>0.13 %</td></tr> <tr><td>Mixed</td><td>597</td><td>2.23 %</td></tr> <tr><td>Not known</td><td>1110</td><td>4.14 %</td></tr> <tr><td>Other:Arab, Arab Scottish or British</td><td>883</td><td>3.29 %</td></tr> <tr><td>Other Black or Caribbean</td><td>70</td><td>0.26 %</td></tr> <tr><td>Other Ethnic Background</td><td>573</td><td>2.14 %</td></tr> <tr><td>Refused to answer</td><td>63</td><td>0.23 %</td></tr> <tr><td>Ukrainian</td><td>688</td><td>2.57 %</td></tr> <tr><td>White:English</td><td>169</td><td>0.63 %</td></tr> <tr><td>White:Irish</td><td>161</td><td>0.60 %</td></tr> <tr><td>White:Other</td><td>1652</td><td>6.16 %</td></tr> <tr><td>White:Other British</td><td>1285</td><td>4.79 %</td></tr> <tr><td>White:Polish</td><td>1499</td><td>5.59 %</td></tr> <tr><td>White:Roma</td><td>20</td><td>0.07 %</td></tr> <tr><td>White:Scottish</td><td>14843</td><td>55.35 %</td></tr> <tr><td>White:Welsh</td><td>7</td><td>0.03 %</td></tr> <tr> <td style="text-align: right;">Sum:</td> <td>26816</td> <td></td> </tr> </tbody> </table> <p>(b) Sex</p> <table border="1" data-bbox="670 1467 1300 1646"> <thead> <tr> <th>Sex</th> <th>Number of applications at 31/03/2025 00:00:00</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Female</td> <td>13907</td> <td>51.86%</td> </tr> <tr> <td>Male</td> <td>12909</td> <td>48.14%</td> </tr> <tr> <td style="text-align: right;">Sum:</td> <td>26816</td> <td></td> </tr> </tbody> </table> <p>(c) Choice groups</p> <table border="1" data-bbox="662 1769 1556 2038"> <thead> <tr> <th>Choice priority</th> <th>a. 16-17</th> <th>b. 18-24</th> <th>c. 25-35</th> <th>d. 36-59</th> <th>e. 60+</th> <th>Sum:</th> </tr> </thead> <tbody> <tr> <td>1. Gold</td> <td></td> <td>1</td> <td>45</td> <td>239</td> <td>178</td> <td>463</td> </tr> <tr> <td>2a. Silver - Homeless</td> <td>65</td> <td>1071</td> <td>2517</td> <td>3490</td> <td>330</td> <td>7473</td> </tr> <tr> <td>2b. Demo & Officer Panel</td> <td>8</td> <td>56</td> <td>59</td> <td>86</td> <td>18</td> <td>227</td> </tr> <tr> <td>2c. Overcrowding</td> <td>4</td> <td>65</td> <td>361</td> <td>676</td> <td>23</td> <td>1129</td> </tr> <tr> <td>2d. Underoccupation</td> <td></td> <td></td> <td>3</td> <td>95</td> <td>68</td> <td>166</td> </tr> <tr> <td>3. Waiting Time</td> <td>60</td> <td>1266</td> <td>3962</td> <td>8345</td> <td>3725</td> <td>17358</td> </tr> <tr> <td style="text-align: right;">Sum:</td> <td>137</td> <td>2459</td> <td>6947</td> <td>12931</td> <td>4342</td> <td>26816</td> </tr> </tbody> </table>	Ethnicity	Number of applications at 31/03/2025 00:00:00	Percentage	African: Other	390	1.45 %	Asian, Asian Scottish/British:Bangladesh	194	0.72 %	Asian, Asian Scottish/British:Chinese	111	0.41 %	Asian, Asian Scottish/British:Indian	163	0.61 %	Asian, Asian Scottish/British:Other	311	1.16 %	Asian, Asian Scottish/British:Pakistani	459	1.71 %	Black,Black Scottish/British	116	0.43 %	Black,Black Scottish/British:African	1322	4.93 %	Black,Black Scottish/British:Caribbean	94	0.35 %	Gypsy - Traveller	36	0.13 %	Mixed	597	2.23 %	Not known	1110	4.14 %	Other:Arab, Arab Scottish or British	883	3.29 %	Other Black or Caribbean	70	0.26 %	Other Ethnic Background	573	2.14 %	Refused to answer	63	0.23 %	Ukrainian	688	2.57 %	White:English	169	0.63 %	White:Irish	161	0.60 %	White:Other	1652	6.16 %	White:Other British	1285	4.79 %	White:Polish	1499	5.59 %	White:Roma	20	0.07 %	White:Scottish	14843	55.35 %	White:Welsh	7	0.03 %	Sum:	26816		Sex	Number of applications at 31/03/2025 00:00:00	Percentage	Female	13907	51.86%	Male	12909	48.14%	Sum:	26816		Choice priority	a. 16-17	b. 18-24	c. 25-35	d. 36-59	e. 60+	Sum:	1. Gold		1	45	239	178	463	2a. Silver - Homeless	65	1071	2517	3490	330	7473	2b. Demo & Officer Panel	8	56	59	86	18	227	2c. Overcrowding	4	65	361	676	23	1129	2d. Underoccupation			3	95	68	166	3. Waiting Time	60	1266	3962	8345	3725	17358	Sum:	137	2459	6947	12931	4342	26816
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Data at 11 August 2025

(a) Ethnic origin

Ethnicity	Number of applications at 11/08/2025 00:00:00	Percentage
African: Other	453	1.62%
Asian, Asian Scottish/British:Bangladesh	197	0.70%
Asian, Asian Scottish/British:Chinese	116	0.41%
Asian, Asian Scottish/British:Indian	167	0.60%
Asian, Asian Scottish/British:Other	336	1.20%
Asian, Asian Scottish/British:Pakistani	493	1.76%
Black, Black Scottish/British	124	0.44%
Black, Black Scottish/British:African	1437	5.13%
Black, Black Scottish/British:Caribbean	98	0.35%
Gypsy - Traveller	34	0.12%
Mixed	613	2.19%
Not known	1156	4.12%
Other:Arab, Arab Scottish or British	997	3.56%
Other Black or Caribbean	76	0.27%
Other Ethnic Background	617	2.20%
Refused to answer	77	0.27%
Ukrainian	727	2.59%
White:English	247	0.88%
White:Irish	170	0.61%
White:Other	1678	5.99%
White:Other British	1298	4.63%
White:Polish	1531	5.46%
White:Roma	25	0.09%
White:Scottish	15351	54.77%
White: Showman, Showwoman	1	0.00%
White:Welsh	10	0.04%
Sum:	28029	

(b) Sex

Sex	Number of applications at 11/08/2025 00:00:00	Percentage
Female	14387	51.33%
Male	13642	48.67%
Sum:	28029	

(c) Choice Groups

Choice priority	a. 16-17	b. 18-24	c. 25-35	d. 36-59	e. 60+	Sum:
1. Gold		2	39	233	169	443
2. Silver - Homeless	65	1131	2635	3578	349	7758
2b. Demo & Officer Panel	8	67	55	82	16	228
2c. Overcrowding	1	64	388	725	24	1202
2d. Underoccupation			2	91	71	164
3. Waiting time	52	1351	4219	8738	3866	18226
Not known		1	2	5		8
Sum:	126	2616	7340	13452	4495	28029

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
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Data at 19 November 2025

(a) Ethnic origin

Ethnicity	Number of applications at 19/11/2025 00:00:00	Percentage
African: Other	514	1.78%
Asian, Asian Scottish/British:Bangladesh	205	0.71%
Asian, Asian Scottish/British:Chinese	120	0.42%
Asian, Asian Scottish/British:Indian	173	0.60%
Asian, Asian Scottish/British:Other	352	1.22%
Asian, Asian Scottish/British:Pakistani	515	1.79%
Black, Black Scottish/British	135	0.47%
Black, Black Scottish/British:African	1499	5.20%
Black, Black Scottish/British:Caribbean	102	0.35%
Gypsy - Traveller	36	0.12%
Mixed	628	2.18%
Not known	1187	4.12%
Other:Arab, Arab Scottish or British	1107	3.84%
Other Black or Caribbean	82	0.28%
Other Ethnic Background	666	2.31%
Refused to answer	88	0.31%
Ukrainian	761	2.64%
White:English	293	1.02%
White:Irish	171	0.59%
White:Other	1700	5.90%
White:Other British	1303	4.52%
White:Polish	1539	5.34%
White:Roma	32	0.11%
White:Scottish	15613	54.15%
White:Welsh	14	0.05%
Sum:	28835	

(b) Sex

Sex	Number of applications at 18/11/2025 00:00:00	Percentage
Female	14693	50.96
Male	14134	49.02
Other	8	0.03%
Sum	28835	

Evidence

Available – detail source

Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal

(c) Choice groups

Choice priority	a. 16-17	b. 18-24	c. 25-35	d. 36-59	e. 60+	Sum:
1. Gold		3	33	231	159	426
2a. Silver – Homeless	60	1187	2741	3772	374	8134
2b. Demo & Officer Panel	8	74	49	85	13	229
2c. Overcrowding		69	373	743	28	1213
2d. Underoccupation			2	89	70	161
3. Waiting time	38	1403	4359	8896	3965	18661
Not known		2	6	3		11
Sum	106	2738	7563	13819	4609	28835

The below table shows that applications from every ethnic origin group, except from “Gypsy”, has increased.

Between March and November, the biggest increase in applications from ethnic groups has been ‘Other: Arab, Arab Scottish or British’, which has seen a 25.37% increase from 883 open applications in March 2025 to 1,107 open applications in November 2025. Similarly, ‘African: Other’ has increased by 31.79%, up from 390 to 514. This aligns with more homeless applicants presenting to Edinburgh following a positive asylum decision, where, as reported in the Committee report for 02 December 2025, there has been an increase by 60% of those with a positive asylum decision being assessed as homeless.

Some nuances may occur when applicants select any of the “White: British” options, where one household may identify as “Scottish”, while the other identifies as “British”.

“White: British” has increased by 48 households, “White: Welsh” households have increased by 7 households, “White: Irish” by 10 households, but “White: English” has seen a significant increase of 124 households, or an increase in 73.37%, from March 2025 to November 2025.

Evidence

Available – detail source

Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal

	31/03/2025	19/11/2025	Increase in numbers	Increase in %age
African: Other	390	514	124	31.79%
Asian, Asian Scottish/British:Bangladesh	194	205	11	5.67%
Asian, Asian Scottish/British:Chinese	111	120	9	8.11%
Asian, Asian Scottish/British:Indian	163	173	10	6.13%
Asian, Asian Scottish/British:Other	311	352	41	13.18%
Asian, Asian Scottish/British:Pakistani	459	515	56	12.20%
Black, Black Scottish/British	116	135	19	16.38%
Black, Black Scottish/British:African	1322	1499	177	13.39%
Black, Black Scottish/British:Caribbean	94	102	8	8.51%
Gypsy - Traveller	36	36	0	0.00%
Mixed	597	628	31	5.19%
Not known	1110	1187	77	6.94%
Other:Arab, Arab Scottish or British	883	1107	224	25.37%
Other Black or Caribbean	70	82	12	17.14%
Other Ethnic Background	573	666	93	16.23%
Refused to answer	63	88	25	39.68%
Ukrainian	688	761	73	10.61%
White:English	169	293	124	73.37%
White:Irish	161	171	10	6.21%
White:Other	1652	1700	48	2.91%
White:Other British	1285	1303	18	1.40%
White:Polish	1499	1539	40	2.67%
White:Roma	20	32	12	60.00%
White:Scottish	14843	15613	770	5.19%
White:Welsh	7	14	7	100.00%

Recorded accessibility data

Accessibility Questions	Number of applications at		
	31/03/2025	11/08/2025	19/11/2025
Autism	1160	1384	1456
Blind / partially sighted	428	466	488
Hearing disability	806	878	914
Learning disability	1563	1768	1832
Mental health problems	6013	6597	6795
Physically disabled	3211	3570	3686
Sum:	13181	14663	15171

The number of households with a recorded accessibility issue has continued to increase since March 2025 across all groups.

In 2022, the EdIndex application questions changed from “do you consider yourself disabled” to individual disabilities to capture the

Evidence

Available – detail source

Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal

different accessibility challenges that applicants may face. Growth in recorded data is expected.

The increase in open applications rose by 2,019 from 31 March 2025 to 19 November 2025. The total number of recorded accessibility issues has risen by 1,990.

A possible explanation for this is applicants who complete the online application could be more likely to select an accessibility option before continuing to the next page of questions, whereas the paper application is 25 pages long and applicants, or someone completing the application on their behalf, could skip various 'optional' questions.

With information about the suspension of the allocations policy being made available on the EdIndex website, it is possible that this could have deterred applicants with no accessibility needs from registering with the knowledge that those with homeless priority are being prioritised.

The largest increase in accessibility in numbers is applicants with mental health problems increasing by 782. The biggest percentage increase at 25.52% is applicants with autism.

A significant amount of applicants with accessibility issues already have a priority awarded. An accessibility issue, in isolation, does not always render a vulnerability which would warrant awarding a priority due to varying needs and requirements of the applicant.

Number of applications at 19/11/2025, 00:00:00						
	Autism	Blind / partially sighted	Hearing disability	Learning disability	Mental health problems	Physically disabled
1. Gold	26	40	45	53	183	264
2a. Silver - Homeless	197	59	70	309	1259	418
2b. Demo & Officer Panel	34	3	8	38	71	54
2c. Overcrowding	99	13	28	101	222	95
2d. Underoccupation	9	7	9	18	54	46
3. Waiting time	1089	366	752	1312	5002	2819
Not known	2			1		3

Elected Member Briefing Note: Gender Responsive Budgeting (swbg.org.uk)

Women are more likely to experience poverty than men and still tend to have more responsibility for unpaid work including childcare, care for older or disabled people, and domestic work. For many women, this means a greater reliance on public services and can limit the time they have for paid work and other activities.

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
		<p>Inequalities based on gender intersect with other forms of inequality based on class, race, disability and other factors so that some groups of women, particularly poor women, women from minority ethnic communities and disabled women face multiple disadvantage.</p> <ul style="list-style-type: none"> • Households headed by single women with dependent children, and single men without dependent children are most likely to experience poverty • Women are more likely to experience sexual and sex- based violence
Research/literature evidence	Rapid Rehousing Transition Plan	<p>Homelessness data shows that 32% of presentations are due to family breakdown in both 2024/25, and so far in 2025/26.</p> <p>HARSAG recommendations, Scottish Government Ending Homelessness Together Action Plan and CEC’s Rapid Rehousing Transition Plan all evidence the need to reduce the number of households in temporary accommodation and prevent homelessness wherever possible. Scottish Government Ending Homelessness Together Action Plan (Nov 2018) – overview of homelessness in Scotland and ambitions of Scottish Government to prevent and end homelessness, including role and duties of local authorities in helping to achieve this.</p> <p>Social Bite/Heriot Watt University report on Temporary Accommodation in Scotland (Nov 2018) highlights pressures on temporary accommodation in Edinburgh.</p> <p>The Preventing Homelessness in Scotland recommendation from the Prevention Review Group and the subsequent joint Scottish Government and CoSLA Prevention Duty consultation paper, identified the ways in which prevention of homelessness as a legal duty may be achieved and defines homelessness prevention as a shared responsibility across public bodies.</p> <p>The Youth homelessness Prevention Pathway published by A Way Home Scotland lays out a pathway to ending youth homelessness and identifies issues that more commonly arise for young people. In Edinburgh there is a Housing Options Protocol in place for young people leaving care. The care leavers housing protocol’s aim is to avoid care leavers having to go through the homeless route to secure accommodation, instead they will be supported and awarded Exceptional Housing Need priority, which will give them a reasonable preference when bidding for social rented accommodation.</p> <p>At the end of March 2025, 65 young people had the priority.</p> <p>Accommodation does not always meet the needs of disabled people. The proportion of households containing a disabled person requiring</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal																																								
		an adaptation to their home was 53.6% in 2019 (<u>Scottish Government, 2023</u>).																																								
Public/patient/client experience information	Customer satisfaction with Council landlord function	<p>The satisfaction results for 2023/24 ARC were based on combination of Tenant Survey 2021 (where the results were overly positive due to the over-representation from the over 65 group) and Tenant Survey 2022. Please see the table below for satisfaction results for ARC 2020/21, 21/22, 22/23 and 23/24.</p> <p>*this question was asked but not in the correct format, so no result was provided as part of the ARC **this question was asked but in the old SHR format, so results were not applicable</p> <table border="1" data-bbox="598 929 1412 1724"> <thead> <tr> <th></th> <th>ARC 2020/21</th> <th>ARC 2021/22 (TS 2021 - over representation from over 65)</th> <th>ARC 2022/23 and 2023/24</th> <th>TS 2024 (to be used for 2024/25 ARC)</th> </tr> </thead> <tbody> <tr> <td>Q1 Overall Satisfaction</td> <td>73.80%</td> <td>80.80%</td> <td>76.2% (TS 2022)</td> <td>67.20%</td> </tr> <tr> <td>Q7 Keeping you informed</td> <td>70.30%</td> <td>86.50%</td> <td>86.50%</td> <td>68.10%</td> </tr> <tr> <td>Q10 Opportunities to participate</td> <td>(95.0%)*</td> <td>99.00%</td> <td>99.00%</td> <td>82.40%</td> </tr> <tr> <td>Q11 Quality of your home</td> <td>73.20%</td> <td>81.60%</td> <td>81.60%</td> <td>70.20%</td> </tr> <tr> <td>Q19 Repairs Service</td> <td>95.50%</td> <td>69.10%</td> <td>60.9% (TS 2022)</td> <td>69.80%</td> </tr> <tr> <td>Q22 Contribution to management of neighbourhood</td> <td>- **</td> <td>81.30%</td> <td>81.30%</td> <td>61.70%</td> </tr> <tr> <td>Q23 Value for Money</td> <td>68.10%</td> <td>82.50%</td> <td>72.0% (TS 2022)</td> <td>74.30%</td> </tr> </tbody> </table>		ARC 2020/21	ARC 2021/22 (TS 2021 - over representation from over 65)	ARC 2022/23 and 2023/24	TS 2024 (to be used for 2024/25 ARC)	Q1 Overall Satisfaction	73.80%	80.80%	76.2% (TS 2022)	67.20%	Q7 Keeping you informed	70.30%	86.50%	86.50%	68.10%	Q10 Opportunities to participate	(95.0%)*	99.00%	99.00%	82.40%	Q11 Quality of your home	73.20%	81.60%	81.60%	70.20%	Q19 Repairs Service	95.50%	69.10%	60.9% (TS 2022)	69.80%	Q22 Contribution to management of neighbourhood	- **	81.30%	81.30%	61.70%	Q23 Value for Money	68.10%	82.50%	72.0% (TS 2022)	74.30%
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Evidence of inclusive engagement of people who use the service and	Ongoing work with Edinburgh Tenants Federation	In relation to internet access, below is the summary from Scottish Household Survey 2022 , respondents who answered “ yes ” to “ households with home internet access ”.																																								

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal																																				
involvement findings		<table border="1" data-bbox="574 358 1316 492"> <thead> <tr> <th>Council</th> <th>Owner occupied</th> <th>Social rented</th> <th>Private rented</th> <th>Other</th> <th>All</th> </tr> </thead> <tbody> <tr> <td>Scotland</td> <td>94%</td> <td>80%</td> <td>96%</td> <td>[u]</td> <td>91%</td> </tr> <tr> <td>CEC</td> <td>92%</td> <td>78%</td> <td>96%</td> <td>[u]</td> <td>91%</td> </tr> </tbody> </table> <p data-bbox="566 548 1572 728">In the Tenant Survey 2021 (where there was an over-representation of 65+ tenants), 51.4% of tenants identified that they had internet access. In the Tenant Survey 2024, a question was raised about accessing digital services. Of 1,000 respondents, 129, or 12.9%, identified that they did not have internet access.</p> <p data-bbox="566 772 1572 952">Scottish Household Survey 2023 results are noted below for respondents who answered “yes” to “households with home internet access. Due to the small sample size of social tenants taking part in the 2023 Scottish Household Survey, the updated table does not provide a figure for the social rented sector:</p> <table border="1" data-bbox="574 996 1428 1153"> <thead> <tr> <th>Council</th> <th>Owner occupied</th> <th>Social rented</th> <th>Private rented</th> <th>Other</th> <th>All</th> </tr> </thead> <tbody> <tr> <td>Scotland</td> <td>93%</td> <td>85%</td> <td>96%</td> <td>[u]</td> <td>91%</td> </tr> <tr> <td>CEC</td> <td>94%</td> <td>0%</td> <td>94%</td> <td>[u]</td> <td>92%</td> </tr> </tbody> </table> <p data-bbox="574 1209 1572 1355">97% of tenants have a smart phone and 78% of 18-35 year olds looking to transact digitally this is a key tool for better engagement and smart phones have built in accessibility tools to increase inclusive engagement.</p> <p data-bbox="574 1400 1572 1579">All appropriate letters and guidance from homelessness services is provided in the service users’ chosen language. Ongoing work on ‘Get connected’ with Simon Community with a commitment of 40 devices for homeless people who do not have digital devices and require them to assist with their homeless journey.</p>	Council	Owner occupied	Social rented	Private rented	Other	All	Scotland	94%	80%	96%	[u]	91%	CEC	92%	78%	96%	[u]	91%	Council	Owner occupied	Social rented	Private rented	Other	All	Scotland	93%	85%	96%	[u]	91%	CEC	94%	0%	94%	[u]	92%
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CEC	94%	0%	94%	[u]	92%																																	
Evidence of unmet need	EdIndex and homelessness data	6,117 households in temporary accommodation including 1,866 with children.																																				
Good practice guidelines		Council House Allocation Policy Rapid Rehousing Transition Plan Local Housing Strategy																																				
Carbon emissions generated/reduced data		N/A																																				

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
Environmental data	The State of the UK Climate report	<p>Scotland's 10 warmest years on record have all occurred since 1997. The average temperatures for the last decade (2014- 2023) were 1.02oC warmer than the 1961- 1990 average, and the warmest year on record was 2022.</p> <p>There has been an increase in rainfall over Scotland in the past few decades with an increasing proportion of rainfall coming from heavy rainfall events. The annual average rainfall in the last decade (2014- 2023) was 10% wetter than the 1961-1990 average, with winters 29% wetter.</p> <p>Mean sea level around the UK has risen by approximately 1.4 mm/year from the start of the 20th century and the rate of sea level rise has increased over the last 30 years.</p> <p>Climate change impacts are frequently felt most by the poorest and most marginalised groups in society, who may also suffer from reduced health and wellbeing.</p> <p>A ‘just transition’ means moving to a more sustainable economy in a way that’s fair to everyone.</p> <p>The just transition addresses various dimensions of inequality, vulnerability and opportunity. It frames the transition with a human rights lens with the aim of eliminating existing inequalities, enabling social inclusion and promoting different forms of equity. From the climate justice perspective, relevant issues include: the disproportionate impacts of climate change on underrepresented and vulnerable communities; the injustices incurred by richer countries being the significant contributors to historical greenhouse gas emissions and poorer countries being the most vulnerable to the impacts of climate change; intergenerational injustices; loss and damage from climate change impacts; and unequal access to clean and affordable energy, green finance and to a sustainable and healthy diet.</p> <p>The just transition is a crucial enabler to implementing the net zero transition: involving all affected parties and responding to injustices serves to ensure political acceptability for climate action, mitigate the risk of ‘just transition litigation’, and ultimately avoid delays in achieving net zero globally. To achieve its varied aims, a just transition is considered to require fundamental restructuring of the socioeconomic systems that have created these inequalities and the climate crisis.</p>
Risk from cumulative impacts		This short term action plan accelerates the actions identified in the HEAP, meaning that some actions required just now may leave

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
		<p>some households at a disadvantage, and the service is committed to minimising these risks.</p> <p>There is a risk that the waiting time for accessing permanent housing with the Council will be longer.</p> <p>The housing emergency action plan contains a series of proposals aimed at improving access to housing, securing best value and ensuring funding levels are appropriate, reducing void property numbers, reducing homelessness, and increasing the number of affordable homes in the city.</p> <p>There is no overall identified risk to improving in these key areas, although in the short term the services offered will change.</p> <p>An intersectional and person-centred approach has been taken when reviewing the impact of this proposal using the available data and evidence. It is not believed that this proposal presents a greater risk to any protected characteristic group. However, analysis has also been done on protected characteristic groups e.g. those from minority communities represent a proportionately smaller group of the overall registration number, and it is not believed these communities are at a proportionately greater risk due to this proposal. Homeless advice presentations to the Council are more likely to be male.</p>
Other (please specify)		
Additional evidence required		

8. In summary, what impacts were identified and which groups will they affect?

Equality, Health and Wellbeing and Human Rights and Children’s Rights	Affected populations
<p>Positive</p> <p>The proposals aim to bring the Council to a compliant state with homelessness legislation. This commitment may mean that an increased number of houses available to the Council will be classed as temporary, but where possible we will look to allocate houses on a</p>	<p>All - but more focused on lone parents (women in particular), carers, ethnic minority</p>

Equality, Health and Wellbeing and Human Rights and Children’s Rights	Affected populations
permanent basis. This approach will focus on families with children first.	communities in the short term.
<p>Negative</p> <p>In suspending the Allocation Policy there will be no properties advertised for rent until the Committee is assured the Council is compliant with housing legislation related to homelessness duties.</p> <p>Prioritisation continues to be given to those with Gold priority through a direct lets process.</p> <p>This means that people of all protected characteristics and economic backgrounds will be unable to bid for Council properties or secure permanent settled accommodation with us, other than those who have been awarded gold priority.</p> <p>RSL properties continue to be advertised and this stock accounts for 50% of homes in the city.</p> <p>All applications are viewed with an intersectional lens, ensuring those with the highest priority (e.g. Gold priority, or silver homeless priority) are allocated houses on an equal basis.</p>	All
Environment and Sustainability including climate change emissions and impacts	Affected populations
<p>Positive</p> <p>Any external contractors will be required to comply with equality legislation and the Council’s sustainability commitments.</p> <p>This will support ‘A Just Transition’ by ensuring people from protected characteristic backgrounds are living in houses that meet a certain standard overtime, and in turn tackling the inequality around the impacts of climate change.</p>	All
<p>Negative</p> <p>N/A</p>	All

Environment and Sustainability including climate change emissions and impacts	Affected populations
Protected Characteristic communities across Edinburgh are vulnerable to a range of impacts from climate change including flooding, damage to property and temperature fluctuations. Climate change impacts are frequently felt most by the poorest and most marginalised groups in society, who may also suffer from reduced health and wellbeing.	

Economic	Affected populations
<p>Positive</p> <p>Homelessness is understood as a key driver of poorer life outcomes, including employability, physical and mental health, and educational attainment. Ensuring the Council is complying with relevant housing legislation relating to homelessness will provide better quality and more secure accommodation overall.</p> <p>Improving access to settled accommodation quicker, especially for households including children and young people, will have a positive impact on these factors.</p> <p>This project will give Council services an additional opportunity to work with homeless households to support income maximisation and other support needs, such as employability services to support people to access and sustain employment opportunities.</p> <p>Looking at Council finance, the Housing Revenue Account will benefit from increased rental income due to the increased number of tenanted properties.</p> <p>There are potential financial benefits to the General Fund in year and long term through the decreased reliance on unlicensed accommodation as temporary accommodation. Under both options it is forecast that the service will operate within the 2025/26 approved budget.</p>	All
Negative	
Potential increase in GF expenditure to obtain other suitable accommodation.	All

Economic	Affected populations
<p>As set out in the report to H, H & FW Committee on 2 December 2025 whilst the forecast households at March 2027 is broadly comparable in both scenarios (option 1 suspending until December 2025 or option 2 suspending until March 2027) , the suspension of the lettings policy to March 2027 would reduce the households in unsuitable accommodation by 377 when compared to option 1.</p> <p>The 2026/27 estimated variance to budget of option 2 is £0.7m compared to an £8.6m variance to budget of option 1, a difference of £7.9m. This difference relates to the savings from having 377 fewer households in unsuitable accommodation and a corresponding increase in use of HRA dispersed flats.</p> <p>Households may face further challenges in finding and retaining employment during this period due to change of address/location. Council funded employability services and the Edinburgh Guarantee will be available to those that need it.</p>	

9. Is any part of this policy/ service to be carried out wholly or partly by contractors and if so how will equality, human rights including children’s rights, environmental and sustainability issues be addressed?

Any contractors used will be through the agreed Repairs and Maintenance Framework (which are awarded in line with the Council’s Contract and Grant Terms & Conditions that align with the above policy areas)

10. Consider how you will communicate information about this policy/ service change to children and young people and those affected by sensory impairment, speech impairment, low level literacy or numeracy, learning difficulties or English as a second language? Please provide a summary of the communications plan.

Following the decision made at Committee, we will update our website with the relevant details, and notify all relevant partners and stakeholders. Please see [communications plan](#) in previous Committee report on 23 September 2025

11. Is the plan, programme, strategy or policy likely to result in significant environmental effects, either positive or negative? If yes, it is likely that a **Strategic Environmental Assessment (SEA)** will be required and the impacts identified in the IIA should be included in this. See section 2.10 in the Guidance for further information.

No.

12. Additional Information and Evidence Required

If further evidence is required, please note how it will be gathered. If appropriate, mark this report as interim and submit updated final report once further evidence has been gathered.

None.

13. Specific to this IIA only, what recommended actions have been, or will be, undertaken and by when? (these should be drawn from 7 – 11 above) Please complete:

Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts)	Who will take them forward (name and job title)	Deadline for progressing	Review date
Continued support for homeless households with income maximization, employability and other supports from existing services.	Nicky Brown – Head of Homelessness and Housing Access	10/2/26	Monthly

Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts)	Who will take them forward (name and job title)	Deadline for progressing	Review date
Continued communication with partner agencies and those impacted	Derek McGowan - Service Director, Housing and Homelessness	10/2/26	Monthly
Cyclical committee updates to be prepared	Lisa Mallon, Head of Housing and Homelessness Strategy, Commissioning and Service Improvement	10/2/26	Cyclical
Continued work on the actions identified in Section 3 of the main report	Derek McGowan – Service Director, Housing and Homelessness	31/3/26	Monthly

14. Are there any negative impacts in section 8 for which there are no identified mitigating actions?

No.

15. How will you monitor how this proposal affects different groups, including people with protected characteristics?

A programme tracker has been developed to monitor progress of the plan and a report will be brought to Housing, Homelessness and Fair Work Committee at the next cycle.

16. Sign off by Head of Service

Name: Derek McGowan

Date: 16 April 2025

Update 1: 11 August 2025

Update 2: 19 November 2025

17. Publication

Completed and signed IIAs should be sent to:
integratedimpactassessments@edinburgh.gov.uk to be published on the
Council website www.edinburgh.gov.uk/impactassessments

Edinburgh Integration Joint Board/Health and Social Care
sarah.bryson@edinburgh.gov.uk to be published at
www.edinburghhsc.scot/the-ijb/integrated-impact-assessments/