

# Lochalsh and Skye Housing Association Equality, Diversity and Inclusion Strategy 2024-2027

## LSHA's Journey

We are a growing organisation and with this comes a need to adapt and change our services.

- In our early days, LSHA had few tenants. This made it easy to:
  - Know their needs
  - Understand their circumstances
  - Respond quickly to changes

With over 850 properties now managed in 2024, we are still trying to provide the same community-based and person-centred support, but it does come with logistical and resource challenges.

- There are things which we recognise we do well already and want to continue to invest in, but we are also on a journey to improve and identify the gaps in our knowledge and services.
- This strategy therefore sets out our values, vision and agenda for building on our existing Equality, Diversity and Inclusion work. We'll highlight good practice where it already takes place and propose new practical actions with achievable timelines.



## LSHA's values and vision

We are committed to fostering a culture which includes these values:

- Treating everyone fairly, equally and sensitively
- Being courteous, friendly and efficient
- Being as open, informative and accessible as possible whilst respecting confidentiality
- Striving to improve our service standards by reviewing them regularly and using feedback from our customers
- Monitoring our performance against our targets and publishing the results

Please click here to see our [Customer Services Charter](#).

### Our [Business Plan](#) Vision to 2028 says:

*“We will have worked with our communities to understand what housing and services they need to thrive. We will have developed bespoke solutions designed around these needs... Our services are inclusive and accessible and can demonstrate the benefits of social investment.”*

### For diversity, equity and inclusion this vision means:

- We have asked tenants sensitively about their protected characteristics and analysed if this correlates to specific needs. We sense-check ourselves to ensure these needs are met and where they are not, we change or adapt our services to rectify this. This can be done by reviewing existing data and inviting people to share their data where it is missing.

## We would have used equalities data in meaningful ways to:

- Change the way we provide a service, or information, so that it is accessible and does not accidentally discriminate against anyone. Use best practice guidance, learning outcomes from complaints and tenant feedback for this.
  - We have analysed and reviewed where our services are representative, or not, of wider populations – such as regional (Highland) or national (Scotland) demographics. We use this data to review if anything could be done differently; are there over/under-represented groups in different performance measures; can these be explained or are they indicative of wider issues or challenges that LSHA needs to do more to resolve to ensure proactive support is given to people when they need it. This could be done through Equality Impact Assessments on a recurring basis.
  - We have made changes where necessary to ensure that everything we do or offer is easy to access for tenants; we have reduced or eliminated barriers to tenants receiving an effective service from us and we make reasonable adjustments where required. Use best practice guidance, learning outcomes from complaints and tenant feedback for this.
  - We have listened to, and better understand what people need and have made reasonable adjustments for them. We have a workforce equipped with knowledge on EDI, who understand how to be flexible and creative to meet people's needs. Staff have a deep understanding of how EDI is related to their role and remit, so that everyone takes responsibility for continuous improvement and championing our values. Developing staff training plans and resource packs for independent learning will facilitate this.
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## Our agenda – why it matters

- There are laws that we must comply with: Housing (Scotland) Act 2010 – this created the [Scottish Social Housing Charter](#) (updated November 2022) with specific outcomes that social landlords are expected to achieve. The first one is about Equalities and there are others which relate to providing inclusive and accessible services like ‘Participation’ and ‘Communication’.
  - And the [Equality Act 2010](#) -- working to understand the individual needs of tenants and to deliver services that recognise and meet these needs.
  - The Scottish Housing Regulator has expectations of social landlords that are detailed in their [Equalities Statement 2023-2026 | Scottish Housing Regulator](#). For example, we must explain to the SHR how LSHA has considered equalities impacts in decision-making when considering a change that will affect tenants/service-users, or within policy reviews, writing new strategies and ensuring there are opportunities for tenants to give us feedback.
  - [Housing as a Human Right](#): The Chartered Institute for Housing explain the importance of this in their report ‘Walking the Talk’ Human rights apply to everyone, meaning that all people living in Scotland are rights holders. These rights aim to allow everyone to lead a dignified life that is free from fear, harm or want and to participate fully in society, without discrimination whatever their race, sex, religion, income or other characteristic.  
A person’s home plays a big role in shaping their dignity, health, wellbeing and safety. Access to an adequate home therefore influences a person’s ability to live in dignity, comfort and security, to earn a living, and to participate in the social and economic life of the community.
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## LSHA has a role to respect, protect and help fulfil these rights in our policies, operations, strategies and compliance with Scottish and UK laws:

- Security of tenure: legal protection from forced eviction, harassment by landlords and other threats to having a settled home.
- Habitability: A dwelling in a decent state of repair that provides a dry, warm home and adequate living space.
- Availability of services: A dwelling has the facilities that makes it habitable, such as sanitation and waste disposal facilities, washing facilities, cooking facilities, storage, heating and lighting. Resolving the housing crisis is integral to the attainment of other human rights, such as those related to family life, privacy, poverty, health, education and the environment
- Affordability: Housing costs are not so high that people struggle to pay for food, fuel and other basics.
- Accessibility: Suitable housing is available to those who require it, including housing that maximises the capacity of individuals with a disability or limiting illness to live independently.
- Location: Housing is situated in areas that allow access to services (e.g., education, health, shops), paid work and participation in civic society. Housing should not be in an environment that is hazardous to health.
- Cultural adequacy: Housing and its allocation should allow people to live in ways that express their cultural identity and does not disrupt their cultural affiliations.

## Actions and key milestones

Expectation/source	Action	Timescales/milestones	Team(s) responsible
<p><b>All equalities duties from SHR, SSHC, Housing as a Human Right and UK/Scottish legislation.</b></p>	<p>Create a staff working group that meets regularly to review and discuss our duties and plan projects to fulfil these. Monitor our progress and report to the Board on key milestones.</p>	<p>Commenced December 2023, bi-monthly meetings</p>	<p>Governance and Compliance Manager, Equalities Working Group</p>
<p><b>Scottish Housing Regulator:</b> working to understand the individual needs of tenants and to deliver services that recognise and meet these needs.</p> <p>&amp;</p> <p><b>Housing as a human right:</b> Cultural adequacy</p>	<p>» Review our data collection approach: confirm data that we hold, what is missing and complete a large-scale data-gathering exercise.</p> <p>» Use good equalities data to help inform our understanding of the individual needs of tenants and other service users. This can also be done through reviewing complaints performance data and learning outcomes (quarterly reported on website, and annually to Board) and Equality Impact Assessments – one per year.</p> <p>» Consider whether satisfaction surveys – with the permission of the relevant tenants – could also be used to gather specific information about the opinions of those with particular equality characteristics.</p>	<p>June 2024</p> <p>June 2024 first EIA, &amp; annual recurrence.</p> <p>Next large-scale tenant satisfaction survey due by March 2025.</p>	<p>Governance and Compliance Manager, Tenant Engagement and support Manager, other members of our Equalities Working Group.</p>
<p><b>Scottish Housing Regulator:</b> LSHA must tell the SHR if and how they have considered equalities impacts in decisions that require our consent, and the outcome of that consideration.</p>	<p>» Evidence that thorough consultation or tenant feedback has been gathered to influence decision-making and how representative of different equalities groups these are. This can be done for internal decision-making too like important decisions around rent reviews that the Board approve.</p> <p>» Equality impact assessments to be completed as a tool for assessing impact of changes in service, policy or approach as well as regular review of operations for continuous improvement.</p>	<p>June 2024 first EIA, &amp; annual recurrence.</p>	<p>Tenant Engagement and support Manager</p>

<p><b>Scottish Housing Regulator:</b> LSHA should annually assess the skills, knowledge and diversity it needs to provide capable leadership and to be effective.</p> <p>LSHA should plan how it will achieve the appropriate and effective composition and profile of governing body members through on-going performance evaluation and active succession planning. Achievement of LSHA's business purpose is helped by having a diverse governing body that can better understand its customers, staff and the wider environment within which it operates.</p>	<p>» Incorporate this into the People Strategy, appraisal process and recruitment and retention practices. Review and recognise our diversity needs and actively plan how we will achieve them.</p> <p>» Actively celebrate diversity and promote diversity among staff, tenants and potential tenants, Board members and wider community to ensure people feel included and welcomed in our locations and service offerings. Do this through tenant communications like newsletters, press articles and social media campaigns. Ensure adverts for any Board member recruitment is explicit in its recognition for valuing diverse representation from different protected characteristic groups.</p> <p>» commence specific recruitment campaign for new Board members so that there can be effective delivery of landlord objectives through the Board membership being more reflective of the tenants, community and other service users that it serves.</p>	<p>October 2024</p> <p>Recurring annually, starting June 2024</p> <p>Commenced April 2024</p>	<p>HR Manager</p> <p>Tenant Engagement and support Manager</p>
<p><b>Scottish Housing Regulator:</b> keeping tenants informed and giving them opportunities to participate could have a strong and positive impact</p> <p><b>&amp; Housing as a human right:</b> Accessibility</p>	<p>» Use good quality equalities data to tailor and target our approach to communicating with tenants and other service users about opportunities to participate and ensure these opportunities are accessible and inclusive. See our Tenant Participation Strategy for further information. We already have good practice with the recording of communication preferences and adhering to these as much as possible when communicating important messages to tenants. We also record if people need large print documents and ask for any communication requirements to be stated at every 'new tenancy follow-up' visit.</p>	<p>Delivery of the <a href="#">Tenant Participation Strategy 2023-26</a></p>	<p>Tenant Engagement and support Manager</p>

<p><b>Scottish social housing charter:</b></p> <p>Equalities; LSHA supports the right to adequate housing &amp; every tenant and other customer has their individual needs and rights recognised, is treated fairly and with respect, and receives fair access to housing and housing services.</p>	<p>» LSHA's housing and tenant support services ensure that proactive, positive interventions are made as early as possible to maximise tenancy sustainment. This can include tenant advice, support, energy advice, allocations procedures and housing options. Regularly offering wellbeing checks through, for example, new tenancy follow-up visits and other engagement. Asking people to share their needs with us and building trusting relationships.</p>	<p>Ongoing</p>	<p>Tenant Engagement and Support Manager, Housing Services, Energy Advice, Tenant Adviser.</p>
	<p>» At every stage of the tenancy journey, offer relevant signposting/referrals to specialist organisations that tenants may benefit from including advocacy services if they are finding it challenging to champion their rights with us directly.</p>	<p>Ongoing</p>	<p>All staff</p>
	<p>» Aspire to achieve equity in services, not equality, to ensure those who are disadvantaged are offered or given the right support and tools to help them help themselves and reduce or eliminate barriers to information, advice and benefiting from the range of services/partnership support we offer.</p>	<p>Ongoing</p>	<p>All staff</p>
	<p>» Implement a person-centred approach to all service provision and establish a regular staff training programme on cultural sensitivity, unconscious bias and how to effectively communicate with diverse tenant populations. Training should be conducted or content provided by credible and specialist organisations with sessions offered multiple times a year to ensure ongoing staff development and understanding of best practices.</p>	<p>Ongoing</p> <p>May 2024</p>	<p>All staff</p> <p>Equalities Working Group</p>
	<p>» Implement evidence-based models and frameworks that help staff recognize and challenge biases and develop more effective communication strategies – an example could be using the Intercultural Development Continuum framework.</p>	<p>Ongoing</p>	<p>All staff</p>
	<p>» In addition to the existing training on mental health support and Autism awareness, expand the program to cover a wide range of topics related to diversity, equity, and inclusion, such as working with tenants from different cultural backgrounds, (and age) supporting LGBTQ+ tenants, and understanding the needs of tenants with disabilities. Regularly assess the effectiveness of the training program and gather staff feedback to continuously improve its content and delivery.</p>	<p>Ongoing</p>	<p>All staff</p>

» Create resource packs for staff to self-educate on specific protected characteristics and housing-related issues, providing a library of resources to seek support or advice for their own work. These resource packs should be regularly updated to ensure they reflect the latest research, best practices, and relevant case studies.

» Incorporate this approach and an awareness of EDI into policies, procedures and working culture; completing EIAs on policy review/new policy completion. A holistic, whole-person solution is offered to any tenants who are struggling to fulfil their tenancy obligations.

» Recognise disadvantage and where reasonable adjustments must be made and prioritising services, being flexible: for example, attending to repairs and maintenance issues quickly if the person has a vulnerability and would be disproportionately negatively affected by a delay in completing a repair. This will be complemented by data collection to know who may need extra assistance based on a protected characteristic.

**Scottish social housing charter:**  
Communication; tenants and other customers find it easy to communicate with their landlord and get the information they need about their landlord, how and why it makes decisions and the services it provides

**& Housing as a human right:** Accessibility

» Use our website, social media and correspondence with tenants like newsletters and consultations to explain how LSHA makes decisions on key services or issues and what is involved in decision-making processes. This includes sharing results/outcomes from our decisions and tenant participation work.

» Offer and promote a range of different communication channels so that people can contact us to suit their preferences and requirements. This includes permitting third party authority requests and similar arrangements for advocates to support tenants with their needs. Joint tenants can have separate requirements, recorded and visible on our system. Digital and non-digital offerings.

» Updating tenant's preferences on request and in a timely manner to ensure data is always accurate and up to date.

» Communication protocols are facilitated for those who request them, which are visible to system users and knowledge of protocols is circulated on a regular basis for awareness-raising of their needs and encourage adherence to these.

» See specific commitments to communication standards in our Tenant Participation Strategy.

Ongoing

Ongoing

Ongoing

Ongoing

Ongoing

Tenant Engagement and Support Manager

All staff

All staff

All staff

Tenant Engagement and Support Manager

	<p>» Offer support and signposting for digital inclusion services, numeracy and literacy support through Highlife Highland or other providers and enable access to technology through charity schemes. »Promotion of social tariffs for internet and use our extra help tenancy sustainment fund for those in financial hardship who need phone data/minutes.</p> <p>» Outreach sessions scheduled in different locations to ensure people can access services locally, in person, at accessible venues.</p>	Digital outreach commenced April 2024 and devices/support sought on request.	
<p><b>Scottish social housing charter:</b> Participation; enabling people to have a real say in decisions that affect them. Tenants and other customers are offered a range of opportunities that make it easy for them to participate in, and influence their landlord's decisions at a level they feel comfortable with.</p>	<p>» Offer a range of ways for people to get involved in giving feedback and having an influence on decisions through the Tenant Participation Strategy.</p> <p>» Discuss all opportunities at 'new tenancy follow-up visits' and throughout the tenancy journey to ensure people can take part in different ways. Organise events or consultations in formats that maximise accessibility and are inclusive.</p>	Ongoing	Tenant Engagement and Support Manager
<p><b>Scottish social housing charter:</b> housing quality and maintenance; tenants' homes, as a minimum, when they are allocated are always clean, tidy and in a good state of repair, meet the Scottish Housing Quality Standard (SHQS), and any other building quality standard in place throughout the tenancy; and also meet the relevant Energy Efficiency and Zero Emission Heat Standard.</p> <p>Tenants' homes are well maintained, with repairs and improvements carried out when required, and tenants are given reasonable choices about when work is done.</p> <p><b>&amp; Housing as a human right:</b> Habitability</p>	<p>» Repairs team commit to quick triaging of issues reported and arranging follow-up investigations with the correct level of priority for both the repair issue and the tenant needing the service.</p> <p>» Regular performance reporting through repairs, stock condition surveys, energy advice assessments and tenant feedback to assess quality of housing and maintenance services. Take action on learning outcomes from complaints and satisfaction survey results.</p> <p>» Collect tenant feedback on design and functionality of homes after move-in and undertake development consultations.</p> <p>» Incorporate components with particular designs to help make more accessible; building new houses that are inclusive by design. Specifications meet accessible housing standards and where possible create lifetime homes that are dementia-friendly and affordable to run.</p> <p>» Work closely with Care and Repair service, Handypersons, Occupational Therapists and Social Work where necessary to ensure people are safe, well and independent at home; making physical changes or adjustments where required and reducing risk of harm. Housing support tenants with changing housing needs; accessible housing transfers or mutual exchange options.</p>	Ongoing	Repairs and Maintenance; Property Services Officers, Property Services Assistants, Technical Services Manager.
		Ongoing	Tenant Engagement and Support Manager, Development Team, Energy Advice Services.
		Tenant satisfaction action plan due for completion by December 2024.	
		Ongoing	Handypersons, Care and Repair Manager, Tenant Engagement and Support Manager, Housing Services.
		Ongoing	

<p><b>Scottish social housing charter:</b> neighbourhood and estate management; as far as reasonably possible that: tenants and other customers live in well-maintained neighbourhoods where they feel safe.</p>	<p>» As far as possible, maintain and establish good working relationships with Police Scotland, Social Work, NHS services and other relevant organisations to ensure tenants are responsible, good neighbours and adhere to the terms of their tenancy agreement. Where there is no cooperation, LSHA will assess the balance of negative impact on the community (frequency/scale) and if there are any known health issues/equalities needs of the perpetrator(s) and take proportionate action to improve the circumstance. This could be through an Antisocial Behaviour Contract or conversion to Short Scottish Secure Tenancy.</p>	<p>Ongoing</p>	<p>Housing Services, Tenant Engagement and Support, Tenant Adviser</p>
<p><b>Scottish social housing charter:</b> Housing options; LSHA helps people to make informed choices and decisions about the range of housing options available to them.</p> <p>Tenants and people on housing lists can review their housing options. People at risk of losing their homes get advice and information on preventing homelessness.</p> <p>Homeless people and tenancy sustainment; tenants get the information they need on how to obtain support to remain in their home; and ensure suitable support is available, including services provided directly by the landlord and by other organisations.</p> <p>People who are homeless or at risk of homelessness get prompt and easy access to help, advice and information; are provided with suitable, good-quality temporary or emergency accommodation when this is needed; and are offered continuing support to help them get and keep the home they are entitled to.</p> <p><b>Housing as a human right:</b> Security of tenure</p>	<p>» We actively pursue all types of communication and engagement with a tenant to ensure they know their options and rights for housing. We will record and update Next Of Kin/emergency numbers and use all possible formats for communication - by letter/email, phone and in-person to ensure people have choice and can make decisions.</p> <p>» Tenant Engagement and Support Manager, Tenant Adviser and Housing Services offers advice/assistance where people are struggling to maintain their tenancy and signpost to relevant teams/services to help the person with any issues that may be causing the threat of homelessness. <a href="#">See more information in our Tenancy Sustainment Strategy &amp; our Extra Help funds Policy.</a></p>	<p>Ongoing</p> <p>Ongoing</p>	<p>Tenant Adviser, Rent Account Manager, Tenant Engagement and Support Manager, Housing Services.</p> <p>Tenant Engagement and Support Manager.</p>

<p><b>Scottish social housing charter:</b> Access to social housing; people looking for housing find it easy to apply for the widest choice of social housing available and get the information they need on how the landlord allocates homes and on their prospects of being housed.</p> <p><b>&amp; Housing as a human right:</b> Availability of services, Security of tenure</p>	<p>» Continue to provide every tenant with a copy of the customer services charter and keep this document up to date so that they know all the different ways they can contact us and expected timescales for a response. Staff to make themselves available for office appointments or home visits on request and always offer digital/offline options for service information.</p> <p>» Review accessibility and format of website or those with learning differences, neurodiverse tenants and people with sensory impairments or with English as a second language.</p> <p>Keep the website property portfolio up to date for people to easily see where and what type of housing LSHA provides.</p>	<p>Ongoing</p> <p>January 2025</p> <p>Ongoing</p>	<p>All staff</p> <p>Digital projects lead/project manager and Tenant Engagement and Support Manager</p> <p>PA/Development</p>
<p><b>Scottish social housing charter:</b> Value for Money; Tenants, owners and other customers receive services that provide continually improving value for the rent and other charges they pay</p>	<p>» Demonstrate value for money through Annual Report on services provided in the financial year and ensuring this is available in different formats.</p> <p>Offer regular updates to tenants on investment decisions and work being undertaken to show how money is spent. Describe value-added or in-kind projects completed, and any grant funding received to complement or expand tenant services paid for by rent.</p> <p>» Be realistic and clear on the costs of modernisation work and the scale of projects that we can deliver.</p> <p>» Complete value for money reviews (internal) and assessments with tenants (through scrutiny/focus-group) for feedback into cost calculations.</p> <p>» Share benchmarking data from other landlords on value for money and average rent costs (Peer Review Report as an example)</p>	<p>Ongoing – annually</p> <p>Ongoing – quarterly newsletter</p> <p>Annual/as required</p> <p>Annual</p>	<p>Tenant Engagement and Support Manager</p>

<p><b>Scottish social housing charter:</b> Rents and service charges;</p> <p>a balance is struck between the level of services provided, the cost of the services, and how far current and prospective tenants and service users can afford them tenants get clear information on how rent and other money is spent, including details of any individual items of expenditure above thresholds agreed between landlords and tenants.</p> <p><b>Housing as a human right:</b> Affordability; tenants' rents, are proportionate, fair and affordable</p>	<p>» Rents and service charges clearly explained at allocation and during sign up, for full transparency over costs and what these include.</p> <p>» At annual rent reviews, complete thorough analysis and comparisons to benchmark against different affordability indicators based on good practice guidance. Make this information available to tenants as well through things like Peer Group Reports and materials to accompany rent consultations.</p> <p>» Regular review of the rent setting policy to take into account good practice, peer comparisons and tenant feedback.</p> <p>» Review and share relevant feedback with Board and staff members on value for money/rents and service charges from rent consultations and tenant satisfaction surveys to inform any changes.</p>	<p>Annual</p> <p>Annual</p> <p>Annual/as required on the policy schedule</p>	<p>Tenant Engagement and Support Manager. Housing Services.</p> <p>Tenant Engagement and Support Manager</p> <p>Tenant Engagement and Support Manager, Director of Finance and Corporate Services, Rent Account Manager.</p>
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