

Equality Impact Assessment: Policy 5 - Backdating Payments

In completing this EQIA, you should be ensuring that you give thought to the needs of diverse groups of people when developing and implementing a new policy, procedure or service or a change to existing ones. Please consider the protected groups in line with the Equality Act 2010 and other diverse groups whom the change may impact.

Name of Activity: Equality Impact Assessment (EQIA) for Policy 5

Name of person completing EQIA: Jill Fotheringham

Date EQIA completed: 30/7/26

What type of activity are you planning?

Change to Policy: Yes

Change to Procedure: No

Change to Service: No

Change to Office Plan / Budget: No

Project: No

Event: No

1. Describe the main aim or purpose of what you are planning to do?

This EQIA considers Policy 5 wording revisions to include reference that ILF Scotland may make an emergency payment to a Coming Home Recipient and not seek reimbursement from the HSCP.

2. Who is this policy, service, or change likely to affect?

Potential ILF Scotland Coming Home Fund recipients.

3. Do you have enough information to know what the potential impact might be on diverse groups and what that might look like?

The protected characteristics to consider are Age, Disability, Sex, Race, Religion or Belief, Gender Reassignment, Sexual Orientation, Marriage and Civil Partnership, Pregnancy and Maternity. It will also be helpful to consider these groups more widely in relation to their socio-economic status that includes such factors as educational attainment, occupation, income, wealth, and social deprivation.

Please mark as Yes or No. If yes use the Comments column to describe what the potential impact is. What are your sources of evidence?

Try to think about both positive and negative impacts. There are various sources of data to help answer this question such as Diversity Networks,

the Diversity Report or Diversity & Inclusion team. Previously completed EQIAs may also offer answers to questions you may have.

Age: No

Comments: No differential impact identified.

Disability: Yes

Comments: A positive impact for disabled people who meet the Access Principles for the ILF Coming Home Fund by removing barriers to independent living through funding to cover emergency support where deemed appropriate.

Gender Reassignment: No

Comments: No differential impact identified.

Marriage and Civil Partnership: No

Comments: No differential impact identified.

Pregnancy and Maternity: No

Comments: No differential impact identified.

Race: No

Comments: No differential impact identified.

Sex: No

Comments: No differential impact identified.

Sexual Orientation: No

Comments: No differential impact identified.

Is there evidence of any impact on other groups not covered by the protected characteristics? If yes, use the Comments column to describe what the potential impact is, what you could do to remove / reduce any negative impact, and what you could do to ensure people benefit from any positive impact.

(For example, carer status, single parent, economic exclusion, care experienced. It is important not to limit your thinking to just the protected characteristics listed above. The question is broadening the EQIA out to be more inclusive. The impact might be a negative one for example making that decision could decrease the opportunity for some people to participate or it could be a positive one for example by making that decision, more people are able to take part in the activity.)

Positive potential impact on unpaid carers for those providing support to family members who meet the Access Principles. Funding to cover emergency support where deemed appropriate and necessary may alleviate significant unpaid carer stress.

The policy changes may have a positive impact by reducing financial barriers to independent living for disabled people with high support needs and reduced reliance on institutional care.

The increased flexibility in funding and support arrangements may have a positive impact for people living in rural or remote areas by enabling tailored solutions where local services are limited and costs high by supporting sustainable independent living in the community.

4. Have you consulted with the relevant internal or external groups? Or have you gathered evidence to help you understand the potential impact on different groups? What sources have you used to gather information?

If there are gaps in information that make it difficult to form an opinion on how your policy, service or change might affect different groups of people, gather other information to help you make an informed decision for example review statistics, survey results, complaints analysis, consultation documents, customer feedback, existing briefings submissions or business reports, comparative policies from external sources and other Government Departments etc.

Policy revisions were informed by engagement through engagement events for disabled people and their families and for professionals, Scottish Government and other statutory partners involved in Health and Social Care, the ILF Scotland Advisory Group, the ILF Re-opening Co-production Group, which includes representatives from Disabled People's Organisations (DPOs) and other third sector partners.

The Coming Home policy amendments have been developed with input from:

- Scottish Government
- Health and Social Care Partnerships
- disabled people and families
- ILF Scotland staff and Advisory Groups
- members of the Coming Home Action Plan Short Life Working Group

Two engagement events with the public were held on 25 May 2026 and 26 May 2026.

Information about these events was widely shared across our social media platforms, on our website, with Disability People's Organisations.

Details contained in the [Coming Home Action Plan 2026 - gov.scot](https://www.gov.scot/publications/coming-home-action-plan-2026/pages/coming-home-action-plan-2026.aspx)

5. Having analysed the relevant sources of information, what does the evidence tell you? Is there any evidence that the proposed changes will have an adverse equality impact on any of these groups of people?

Age: No

Disability: No

Gender Reassignment: No

Marriage and Civil Partnership: No

Pregnancy and Maternity: No

Race: No

Religion or Belief: No

Sexual Orientation: No

Care Experienced: No

6. Please provide details of who the proposals affect, the adverse impacts and explain how you will minimise or remove the adverse impact.

No adverse impacts noted.

7. Is there any evidence that the proposed changes will have a positive impact on any of these groups of people and / or promote equality of opportunity? Please provide details of which group / groups might benefit from the positive impacts and how you intend to promote and evaluate any benefit.

Age: No

Disability: Yes, a positive impact for disabled people who meet the Access Principles by removing financial barriers to independent living

Gender Reassignment: No

Marriage and Civil Partnership: No

Pregnancy and Maternity: No

Race: No

Religion or Belief: No

Sexual Orientation: No

Care Experienced: Yes, changes may have a positive impact for people with care experience by supporting transitions from institutional or residential settings to community-based independent living and reducing the risk of prolonged or inappropriate out of area placements.

8. Provide a final summary of the commitments / actions you will take in consequence of completing this EQIA. Who will you consult with on your action plan and how will you do this to ensure the relevant stakeholders understand the equality impact?

The policy revisions for Coming Home promote equality of opportunity by:

- supporting disabled people to live independently
- reducing institutionalisation
- increasing choice, control and flexibility
- aligning with Article 19 of the UN Convention on the Rights of Persons with Disabilities

Policy revisions and the practical impact on will be monitored and reviewed the ILF Coming Home team delivery. We will continue to consult with Re-opening Co-production Group, Scottish Government and statutory partners. We will seek feedback from Coming Home recipients.

**9. Have you a plan in place to review your actions?
Please provide a summary. Will the plan require sign off
and if so, from where?**

Policy revisions and the practical impact on will be monitored and reviewed the ILF Coming Home team delivery. We will continue to consult with Re-opening Co-production Group, Scottish Government and statutory partners. We will seek feedback from Coming Home recipients.

This plan is signed off by: Linda Scot

Title: Director of Policy, Improvement & Engagement

Date: 3 August 2026