Rapid Rehousing Transition Plan

25 APRIL 2019

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1. Introduction

The Homelessness & Rough Sleeping Action Group (HARSAG) was set up by Scottish Government in October 2017 to produce short and long-term solutions to end homelessness and rough sleeping. Led by best evidence, the cornerstone of recommendations is a transition to a Rapid Rehousing approach of which Housing First forms a smaller component.

Rapid rehousing is about taking a housing led approach for rehousing people that have experienced homelessness, making sure they reach a settled housing option as quickly as possible rather than staying in temporary accommodation for too long.

Where homelessness cannot be prevented, Rapid Rehousing means:

- A settled, mainstream housing outcome as quickly as possible;
- Time spent in any form of temporary accommodation reduced to a minimum, with the fewer transitions the better;
- When temporary accommodation is needed, the optimum type is mainstream, furnished and within a community.

For people with multiple needs beyond housing:

- Housing First is the first response for people with complex needs and facing multiple disadvantages;
- Highly specialist provision within small, shared, supported and trauma informed environments in mainstream housing, including Housing First, is not possible or preferable.

The Council has considered how it can transform current service provision over the next 5 years to reduce homelessness in Moray. It has also considered the resources that will be required to make the transformational change. The Council has looked at how it can minimise costs by making homelessness a "corporate" responsibility rather than simply a "housing" problem. Further discussions with other council services, agencies, housing associations, third sector partners and service users will help shape future services with the aim of preventing homelessness where possible.

The transformational change set out in this RRTP will cover the period 2019/20 to 2023/24.

2.   Links to other Strategies and Plans

The graphic below illustrates the linkages between strategic approaches relating to rapid rehousing and Housing First, covering allocation policy priorities, approaches to increasing supply including new build, and care and support services.

This Plan is one of a suite of strategic documents which make up the Local Housing Strategy. This will be reviewed annually as part of the Strategic Housing Investment Plan (SHIP) process. The Plan will also influence Health and Social Care Moray's Strategic Commissioning Plan and associated Housing Contribution Statement.
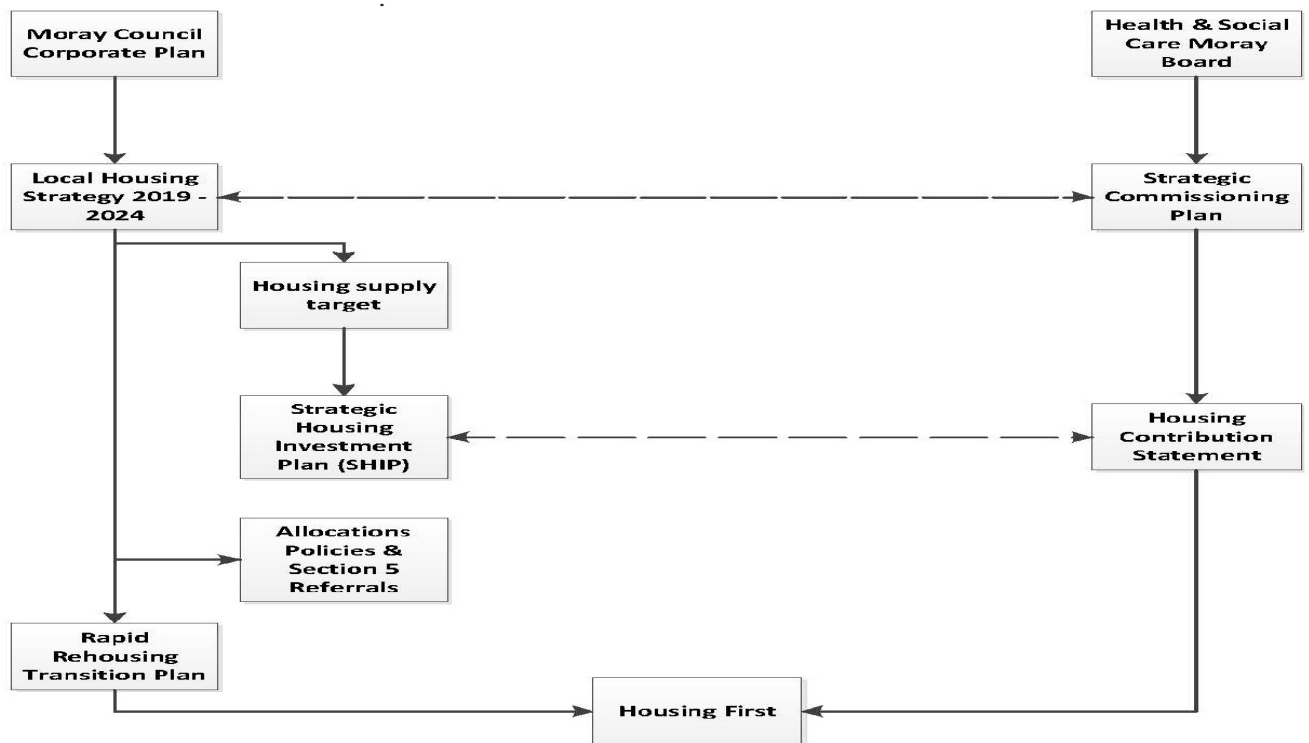
3.   Moray's Housing Market

There are approximately 43,000 households in Moray and this is expected to increase to 47,700 households by 2037. In common with many other parts of Scotland, Moray is projected to have an increasing proportion of smaller households over this period.

The Housing Need and Demand Assessment (HNDA) was appraised as "robust and credible" by the Centre for Housing Market Analysis on 5 April 2018. The HNDA findings were broadly consistent with those of the previous HNDA 2011, in that there is an acute shortage of affordable housing in Moray. The HNDA found that 2,120 new housing units would be required during 2018/19 to 2023/24 to meet need (424 per year), and of those **56%** should be provided as "affordable housing".

The Council is the biggest social landlord in Moray, with approximately 6,100 properties. Local Housing Associations own around 2,400 properties. Together this housing stock generates around 600 vacancies per year. Moray has proportionally fewer social rented properties (19%) and a smaller private rented sector (11%) than the Scottish average.

At 31 March 2019, there were 3,147 households registered on the Council's housing list, and on average there were 8 applicants for every vacancy. This ratio varies widely across house sizes. The greatest pressure is on 4 bedroom properties (22:1) and on 1 bed general needs (39:1). There is considerably less pressure on 2 bed general needs properties (5:1). At any given time, Moray Council has approximately **100-130** statutorily homeless households waiting to be permanently rehoused.

4. Homelessness Context

Moray performs well in reaching decisions on homeless applications within 28 days, i.e. the benchmark set by the Code of Guidance on Homelessness 2005. **Table 1** provides details of performance**.**

Table 1:	2013/14		2014/15		2015/16		2016/17		2017/18	
Statutory Decisions	No	%	No	%	No	%	No	%	No	%
Under 28 days	386	91.3	419	93.1	426	96.8	419	95.9	416	96.7
Over 28 days	37	8.7	31	6.9	14	3.2	18	4.1	14	3.3
Total	**423**	**100**	**450**	**100**	**440**	**100**	**437**	**100**	**430**	**100**

Source: HL1 data

Table 2						
Homeless Decisions	**Status**	**2013/14**	**2014/15**	**2015/16**	**2016/17**	**2017/18**
Homeless/Potentially Homeless Priority	Unintentional	183	293	293	293	275
Threatened with Homelessness	Unintentional	12	30	50	39	46
Homeless Priority	Intentional	41	54	54	37	42
Not Homeless/Potentially Homeless	Ineligible for assistance	3	4	6	5	6
Not Homeless/Potentially Homeless	No Duty	52	67	43	68	65
Resolved Homelessness prior to decision	No Duty	37	54	60	73	66
Lost Contact	No Duty	5	2	5	5	6
Withdrew Application prior to decision	No Duty	39	69	68	56	33
Other – threatened with homelessness	Intentional	-	5	2	-	-

Source: HL1 data

The HNDA 2017 provides an analysis of homeless decisions from 2012/13 to 2016/17. It found that during this period:

- The group most likely to become homeless are aged 18 to 49 (80%);
- The majority of applicants are single person households (53%);
- The main reason for homelessness is being "asked to leave" (41%);
- This is followed by a "non-violent dispute within the household" (12%);
- Moray recorded a low number of rough sleepers;
- The vast majority of homeless households have a local connection to Moray;
- Local connection is mainly associated with residency and family association;
- Approximately 60% of presentations were found to be statutorily "homeless/ potentially homeless unintentional"; and
- Repeat homelessness was generally lower than the Scottish average.

The characteristics of homeless households have remained consistent in recent years with a **high proportion of single person households** compared to families. The higher proportion of single person households is significant in relation to demand for temporary and permanent accommodation, particularly **1 bed properties**. The age range of applicants has also remained consistent with over half aged 26-59 and **around one third aged 18-25.**

Rough Sleeping in Moray

Scottish Government data (**Table 3**) shows that over the last 5 years, the prevalence of rough sleeping in Moray is similar to comparator authorities (e.g. Highland and Argyle and Bute) and considerably less than larger urban authorities. Homeless applicants self-certify that they have slept rough and while it is important to gather this information, Officers do not observe rough sleepers on the streets of Moray in a manner similar to the streets of Scotland's larger cities (i.e. Glasgow, Edinburgh, Dundee and Aberdeen).

Table 3	2013/14		2012/15		2015/16		2016/17		2017/18	
Slept rough night before	14	4.7%	16	5.4%	15	5.1%	17	5.8%	14	5.1%
Slept rough in last 3 months	32	10.9%	31	10.5%	41	14.0%	38	12.9%	35	12.7%

Source: HL1 data

Housing Options/ Homelessness Prevention

Housing options is defined by the Scottish Government as "a process which starts with housing advice when someone approaches a local authority with a housing problem." Local authorities must take a holistic approach and offer advice and assistance specifically tailored to an individual's circumstances. The aim of housing options is to prevent homelessness (where possible) before it occurs.

In October 2010, the Council introduced its Housing Options Team. The Team has evolved over time and currently provides an advice service to households who are in accommodation but experiencing housing difficulties. These households would not be regarded as homeless or threatened with homelessness.

The Council has robust mechanisms in place to ensure that there is no "gatekeeping" of those who attend a housing options interview. All households are informed of their right to make a homeless application and sign off the advice they have received and the options they decide to pursue.

Housing Options continues to be an effective service that can prevent homelessness and alleviate other housing situations (which if not addressed) can lead to homelessness.

Table 4 provides details of the number of households who have received a housing options interview and the outcomes that resulted from this:

Table 4: Outcomes	2014/15		2015/16		2016/17		2017/18	
	No.	%	No.	%	No.	%	No.	%
Made Homeless application to LA	450	44.2	493	44	469	42.8	449	42.4
Remained in current accommodation	209	20.6	248	22.1	238	21.7	245	23.1
Friends relatives	76	7.5	104	9.3	121	1.1	100	9.4
Lost contact with applicant	99	9.7	99	8.8	77	7	84	7.9
Private rent-short assured	66	6.5	65	5.8	97	8.8	82	7.7
LA tenancy	34	3.3	48	4.3	30	2.7	27	2.5
Housing Association tenancy	13	1.3	4	0.4	13	1.2	19	1.8
Not known	35	3.4	20	1.8	17	1.5	17	1.6
Other (known)	12	1.2	13	1.2	10	0.9	15	1.4
Lodger	8	0.8	16	1.4	4	0.4	8	0.8
Bought own home-other means	3	0.3	3	0.3	5	0.5	4	0.4
Sheltered accommodation	1	0.1	3	0.3	3	0.3	3	0.3
Shared property-Local authority	0	0	0	0	2	0.2	2	0.2
Shared property-Private rented	0	0	1	0.1	2	0.2	2	0.2
Supported Housing/ accommodation	0	0	1	0.1	1	0.1	1	0.1
Prison	0	0	0	0	2	0.2	1	0.1
Private rent-assured	10	1	3	0.3	2	0.2	0	0
Voluntary organisation tenancy	1	0.1	0	0	1	0.1	0	0
Women's refuge	0	0	0	0	1	0	0	0
Shared ownership	0	0	0	0	1	0.1	0	0
Hospital	0	0	0	0	1	0.1	0	0
Total	**1,017**	**100**	**1,121**	**100**	**1,097**	**100**	**1,059**	**100**

Source: PREVENT1 Data 2014-2018 (Annual report for Moray).

Housing Options work in partnership with other Council Services, Partner Agencies, the third sector and families to prevent and alleviate homelessness. Some areas still need to be developed to deliver the outcomes that are set out in the RRTP. Current services/partners include:

Council Services

- Housing Service – Serious Rent Arrears Group (Council Tenants only);
- Housing Support Service (community) and Housing Support Service (temporary accommodation);
- Occupational Therapist (based in Housing Team and jointly funded by the Moray Integration Joint Board);
- Community Safety Team;
- Money Advice; Income Maximisation; and Welfare Benefits Teams;
- Children and Family Social Work Services;
- Criminal Justice/Youth Justice; and
- Housing Benefit Team.

<u>Partner Organisations</u>

- Moray Integration Joint Board;
- Citizens Advice Bureau;
- Arrows (Drug and Alcohol Service);
- Advocacy Services; and
- Moray Women's Aid (Residential Support service for women at risk of domestic abuse)
- SACRO (Residential Support Service for those with Addictions)
- SACRO (Residential Support Service for young people 16 -24)

Homeless households continue to present to the local authority with a range of vulnerabilities. These can often become a barrier into permanent accommodation and extend the period of time that households remain in a homeless situation. Housing Support is a key element to enable households to move through the system sooner.

Of the 460 households who received housing support in 2017/18, 158 were already involved with other services. Lack of life-skills (219) was the highest reason for requesting the service. This was followed by Financial/Literacy (164), Alcohol/Substance misuse (61) and Mental Health (16). This service continues to operate under pressure and will be an area proposed for strengthening within the RRTP.

Table 5 highlights the type of vulnerabilities that homeless people in Moray are presenting with:

Table Key:

↔	Baseline and/or no significant change
^	Upward Trend
v	Downward Trent

Table 5:	Baseline Year 2014/15		2015/ 16	Trend	2016/ 17	Trend	2017/ 18	Trend
Details of Vulnerabilities								
Financial difficulties /debt /unemployment	312	↔	301	v	159		226	^
Physical health reasons	134	↔	142	^	103	^	90	v
Mental Health reasons	213	↔	217	^	149	v	168	^
Unmet need for support from housing/social work/health services	15	↔	18	^	14	v	15	↔
Unmet need for support from friends/family	83	↔	82	↔	53	v	61	^
Difficulties managing on own	97	↔	103	^	90	v	83	v
Drug/Alcohol dependency	75	↔	69	v	52	v	45	v
Criminal/anti-social behaviour - victim	72	↔	83	^	53	v	49	v
Criminal /anti-social behaviour - perpetrator	37	↔	35	v	25	v	26	↔
Not to do with applicant household (e.g. landlord selling property, fire, circumstances of other persons sharing previous property, harassment by others, etc.)	11	↔	4	v	1	v	14	^
ALL	**1049**	↔	**1054**	^	**699**	v	**777**	^
Multiple responses are allowed for this question								

Source: Prevent 1 data – This became a mandatory reporting requirement to the Scottish Government in 2014/15.

Poverty

Poverty continues to be the highest reason for vulnerability. Financial difficulties/debt/unemployment (29%) is the main reasons for housing options/homeless referrals to the Council's Welfare Teams. During 2018/19, the number and type of referrals were:

- Money Advice – 45
- Welfare Benefits – 8
- Income Maximisation - 63
  These referrals represent the number of households who were willing to be referred to these services.

An additional 1.5 FTE staff will be recruited to the Council's Welfare Teams in 2019. This is deemed necessary due to service demand and is an enhancement in terms

of current service. These staff will be part funded by the European Union (75%) and the Council (25%). The funding will continue (irrespective of Brexit) until 31 March 2023. This is considered an essential service for those who are homeless or at risk of homelessness. The RRTP has included part-funding of these posts for 2023/24.

The Housing Service (Serious Rent Arrears Group) seeks to prevent households in rent arrears from being evicted from council housing. If court action is initiated, the Group will review each case and agree actions to prevent eviction where possible. The approach is multi-disciplinary with Housing Managers, Housing Officers, Children and Families Social Work, Housing Options and the Housing Support Teams all playing key prevention roles. **Table 6** sets out the number of court actions and the number of evictions. This shows the positive role that the Group in preventing evictions. Eviction continues to be the option of last resort and the Council will only pursue this where the household refuses to engage with services.

Table 6:	2013/14	2014/15	2015/16	2016/17	2017/18
Court Actions initiated with the potential for eviction	100	100	68	79	61
Number of properties recovered because rent had not been paid	4	11	7	9	9
Number of properties recovered because of anti-social behaviour	1		1		
For other reasons		1			
Total	**5**	**12**	**8**	**9**	**9**

Source: ARC data

Mental/Physical health

These can sometimes be complex and require a multi-disciplinary approach to find the most appropriate housing solution. Homeless households who self-identify that they have problems with their mental and/or physical health may not have a medical diagnosis but continuing research into health and homelessness supports a conclusion that being at risk or becoming homeless does have a detrimental impact on people. The Housing Service has developed strong links with the Moray Integration Joint Board (MIJB) and there are many examples of good practice both in terms of joint working and the delivery of new housing services for those with complex needs. The MIJB has jointly funded an Occupational Therapist located in the Housing Service. This post assesses health and housing needs. The RRTP provides an opportunity to increase this resource within the Housing Service. Their primary role will be to fast-track health and housing assessments to help some households at risk of homelessness to move directly into permanent accommodation. This approach will reduce the time that some households currently spend in temporary accommodation.

There is need for all services to improve their understanding of mental/physical health and how this can impact on households who become homeless or at risk of homelessness. There is a need to develop a joint approach with other services rather than homelessness simply being regarded as a "housing problem".

Unmet need for support

More than half of homelessness presentations arise due to relationship difficulties with their household. Some of this homelessness could be prevented through intervention in the family. The Council recently ended a mediation service that dealt with neighbour disputes. The RRTP provides an opportunity to fund a family mediation service based on similar costs. The service would be aimed at households where there has been a relationship breakdown (non-violent/abusive) to negotiate solutions that prevent homelessness.

Households who indicated a lack of support from housing/social work/health services (15 households) will be targeted for Housing First. Local knowledge and the consistency of data over the last 5 years justify an annual requirement for 15 Housing First cases per year. The RRTP provides an opportunity to fund Housing First and the Council will develop this service in the first 6 months of 2019/20. The Council already operates a "scatter flats" initiative for care leavers. That initiative (with some minor changes) is nearly identical to outcomes that Housing First seeks to achieve. The initiative has also been fully costed and will be used to inform the funding we seek from the Scottish Government to deliver Housing First in Moray. The number of households identified for Housing First will be reviewed on an annual basis.

Drug and Alcohol Dependency

The number of households who self-identified that they were vulnerable due to drug/alcohol misuse has reduced in recent years. While this is welcome, households with these problems can often be the most difficult to accommodate. SACRO works in partnership with the Council to provide a residential housing support service for households with these difficulties. A review of the SACRO service is already planned for 2021/22. Any decision to decommission this residential support service and move residents into the community will require "floating" support. Ending the contract will generate a saving for the Council but given the ongoing budget pressures faced by the Authority, it is likely that will go towards future budget shortfalls. It is intended to increase the number of Housing First units to 20 in 2021/22. This will provide an additional safety net for those in Guildry House should the service close.

Anti-social behaviour/Homelessness

The Community Safety Team is a multi-disciplinary Team involving staff from Environmental Health, Housing, Police, Social Work and Education (when appropriate). They work together to tackle and reduce anti-social behaviour across all tenures in Moray. In terms of homelessness, a low number of households report that they are vulnerable due to anti-social behaviour either as a victim or perpetrator.

5.   Health and Homelessness

On 19 June 2018, the Scottish Government published a study exploring the relationship between homelessness and health. This built upon analysis undertaken in the USA and by Fife Council and NHS Fife in 2015. The study links homelessness and health datasets for the first time at a national level and explores the relationship between homelessness and health in Scotland.

This research combines Scottish Government homelessness data (HL1) with six health datasets from NHS National Service Scotland covering Accident and Emergency attendances (A&E2), Inpatient admissions (SMR01), Outpatient appointments (SMR00), Prescriptions (PIS), the Scottish Drugs Misuse Database (SDMD) and Mental Health admissions (SMR04), together with information about deaths from National Records of Scotland. The key findings from the study were:

- At least **8% of the Scottish population** (as at 30 June 2015) had experienced homelessness at some point in their lives.
- Of those who had experienced homelessness at some point:

  o   Over half (**51%)** had no evidence of health conditions relating to drugs, alcohol or mental health. This was much lower than in the control groups (MDC 74%, LDC 86%).

  o   Around 30% had evidence of a mental health problem at some point during the study period (with no evidence of drug or alcohol-related conditions at any point). This was higher than in the control groups (MDC 21%, LDC 13%).

  o   There was evidence of drug and/or alcohol-related interactions for the remaining fifth of people (19%), higher than in the control groups (MDC 5.1%, LDC 1.2%). Of these, the vast majority (94%) also had evidence of mental health issues.

  o   Around **6%** of people experiencing homelessness **had evidence of all three** of the following conditions – a mental health condition, a drug-related condition and an alcohol-related condition – although not necessarily at the same time. This was much higher than in the control groups (MDC 1%, LDC 0.2%). The figure was markedly higher for those experiencing repeat homelessness (11.4%).

- Increased interactions with health services preceded people becoming homeless.

- A peak in interactions with health services was seen around the time of the first homelessness assessment.

Repeat Homelessness in Moray

Table 7 shows the number of repeat homelessness cases in Moray. This figure is consistent with the number of households that claim they have unmet need from various services and they tend to float in and out of homelessness. These are the households that will be targeted for Housing First.

Table 7	2013/14	2014/15	2015/16	2016/17	2017/18
Repeat homelessness	15	15	20	25	15

Source: HL1 data

RRTP Priorities -Vulnerabilities/Support/Housing First/Housing Options

Poverty

i) There is a need to improve awareness of the financial vulnerabilities that affect homeless households and identify early intervention options to prevent homelessness. This awareness will be directed at services/agencies who work with households who are homeless or at risk of homelessness. This will be progressed and delivered through the North East, Highlands and Islands Homelessness Hub Group. (**YEAR 1**)

ii) The Housing Options Team will receive enhanced training in relation to financial advice/benefits. This is aimed at improving the level and type of advice that they can provide to households seeking housing options advice. The training will be delivered by the Council's corporate training team in consultation with service managers in the welfare teams. **(YEAR 1**)

iii) Funding for the additional 1.5 FTE staff recruited to the Council's Welfare Teams ends at 31 March 2023. This will result in a service reduction. To avoid this, funding to the level provided by the EU will be requested as part of the RRTP for 2024/25. This is to ensure these vital services are maintained at the current level for the final year of the RRTP. (**YEAR 4**)

Health and Homelessness

i) There is a need to fast track health and housing assessments for households who are homeless or at risk of homelessness. Currently, there is 1 FTE Occupational Therapist located in the Housing Service who assesses these needs. Due to workload pressures within the MIJB, they have no capacity to provide an additional resource for this purpose. Funding for an additional Occupational Therapist is deemed necessary in order to speed up the assessment process. Funding for an additional OT to be based in the Housing Service is included in the RRTP. (**YEAR 1**)

ii) There is a need to improve awareness of the mental/physical health vulnerabilities that affect households who are homeless or at risk of homelessness. This awareness will be directed at services/agencies who work with households who are homeless or at risk of homelessness. This will be progressed and delivered through the North East, Highlands and Islands Homelessness Hub Group. (**YEAR 1**)

iii) The Housing Options Team will receive enhanced training in relation to mental/physical health vulnerabilities. This is aimed at improving their understanding of mental/physical health and the barriers that this can cause for households who are homeless or at risk of homelessness. The training will be delivered by the Council's corporate training team in consultation with service managers from the MIJB. **(YEAR 1**)

iv) There is a need to develop a collaborate approach with Moray Integration Joint Board, Social Work and other key services/partners to deliver better outcomes

for households at risk of homelessness and who are vulnerable due to mental/physical health. It is proposed to link this with a wider review of office provision and look at options for co-location/shared resources. (**YEAR 2**)

Friends/Family Mediation

i)   The majority of homeless households originate from the family home or are living with friends. There is a need to develop a mediation service for households living with friends/family who are at risk of homelessness. This will be progressed as part of an enhancement of the housing options service. It is planned to have this place by 1 April 2020. (**YEAR 2**)

Housing Support

i)   Housing Support is a vital component in preventing homelessness and ensuring that households (if homeless) are able to move into permanent accommodation as quickly as possible. The RRTP recognises the need to enhance the service and proposes an additional (1) Housing Support Assistant and (2) Housing Support Workers. These will work with vulnerable households at risk of homelessness (including council tenants). Their role will be to front load support at an earlier stage to prevent homelessness where possible. The structure of this team will be added to in YEAR 2 with the Housing Support Assistant overseeing staff employed to deliver Housing First. These officers will also focus on reducing the lengths of stay in temporary accommodation. (**YEAR 1**)

Housing First

The Housing First model provides ordinary, settled housing as a first response for people with complex needs. It recognises a safe and secure home as the best base for recovery and offers personalised, open-ended, flexible support for people to end their experience of homelessness and address wider needs. The model separates the provision of housing and support, offers choice and control to tenants and works to the principles of harm reduction.

The Health and Homelessness Data Linkage study found that "around **6%** of people experiencing homelessness had evidence of all three of the following conditions – a mental health condition, a drug-related condition and an alcohol-related condition". In Moray, this estimate would be around 15 households. They include households who live chaotic lifestyles, experience repeat homelessness and are high consumers of NHS services.

i)   The Council's approach to Housing First will be developed in 2019/20 and go live from 1 April 2020. A total of 15 tenancies will be provided for this purpose in 2020/21. Additional "wrap around support" will be required to mitigate the risk of tenancy breakdown and an element of this will also need to be available out of normal working hours. An additional (5) Housing Support Workers are proposed within the RRTP to deliver housing support when required (including out of hours and weekends). (**YEAR 2**)

ii)   To keep costs low and ensure properties are of a reasonable standard it is intended to use the council's housing stock for Housing First.   There will be occasions where tenancies will have to be held (past the normal void period) to allow the smooth transition of more chaotic households into housing. To ensure that the Housing Revenue Account is not financially disadvantaged, costs has been included within the RRTP to reduce unavoidable rent loss. These costs will focus on the average rent for a 1 bedroom property (£50.69) and allow up to a 4 week delay for the 15 Housing First Properties. There will of course be other housing cases where delays will occur and the HRA will be compensated where this occurs up to the costs set out within the resource assumptions. Strict guidelines will be developed to ensure that only appropriate rent loss is recovered. (**YEAR 2**).

iii)   Housing First properties will need to be furnished. It is proposed to work in partnership with Moray Fresh Start (Third Sector Organisation) to enable them to provide this service on behalf of the Council. (**YEAR 2**)

iv)   The number of Housing First Properties will increase to 20 in 2021/22. This is to ensure that there is enough provision should Guildry House close. (Page 24 refers) (**YEAR 3**)

v)   Based on current assumptions, it is proposed to reduce the number of Housing First properties back to 15 in 2022/23 (**YEAR 4**) and 15 in 2023/24 (**YEAR 5**). This assumes no significant change in the vulnerability baseline figures. The Council will review Housing First on an annual basis. This will determine the number of properties that it requires for this purpose.

vi)   Costs relating to Housing First from Year 2 to Year 5 are included in the RRTP funding requirements.

Housing Options

The Council participates in the Highlands and Islands Housing Options HUB and uses this opportunity to benchmark and share best practice on issues relating to homelessness. The HUB has previously delivered awareness training to a range of staff on issues facing homeless households and through this involvement, Officers will request that further training events are delivered specific to areas of health and vulnerability. (**YEAR 1**)

i)   The Housing Options Toolkit is currently being developed and is expected to be available from April 2020. The Council will use this toolkit to further develop the Housing Options Service and Homelessness Services. (**YEAR 2**)

ii)   The Council has protocols in place for those at risk of homelessness who are leaving the Armed Forces, Hospital and/or Prison. The Armed Forces Protocol was reviewed during 20171/8 and a revised protocol agreed from 1 September 2017. The Council and the MOD joint Services Housing Advice Office are joint signatories to the revised discharge arrangements. The Hospital Discharge Protocol was reviewed during 2018/19 and revised arrangements were agreed from 1 November 2018. The Council, NHS Grampian and the MIJB are joint signatories to the new Protocol.   The Prison Discharge Protocol (implemented

1 May 2012) will be reviewed in 2019/20. The Protocol will be updated to include SHORE standards. As part of this review, the Council will consult with key stakeholders including Scottish Prison Service, Social Work, Criminal Justice, Youth Justice, MIJB and service users (**YEAR 1**).

iii)   The RRTP will require the Council to regularly update policies and procedures relating to Housing Options and Homelessness. They will also develop a comprehensive Training Plan for Housing Options activities in consultation with the Highlands and Islands Housing Options HUB. To enable this work to be completed timeously, a Policy Officer is included within the RRTP to complete a range of tasks identified within the RRTP. (**YEAR 1)**

Homelessness in Moray

Table 8 shows that homelessness has continued at comparable levels since 2013/14. **Table 9** provides the reasons for this:

Table 8:	2013/14	2014/15	2015/16	2016/17	2017/18
Homeless Assessments completed	563	587	576	578	574

Source: HL1 data

Table 9:	2013/14		2014/15		2015/16		2016/17		2017/18	
	No.	%	No.	%	No.	%	No.	%	No.	%
Asked to leave	156	27.7	194	33	218	38	237	41	208	38.7
Dispute-non violent	90	16	86	14.7	78	13.6	71	12.3	68	12.6
Dispute-violent	75	13.3	68	11.6	66	11.5	64	11.1	64	11.9
Terminate tenancy-Landlord action	52	9.2	64	10.9	60	10.5	39	6.7	41	7.6
Terminate tenancy-Mortgage arrears/default payment	50	8.9	33	5.6	42	7.3	22	3.8	33	6.1
Other reason for leaving accommodation	40	7.1	22	3.7	20	3.5	37	6.4	23	4.3
Discharge-Prison/care/Institution	20	3.5	24	4.1	24	4.2	18	3.1	29	5.4
Overcrowding	18	3.2	23	3.9	22	3.8	19	3.3	14	2.6
Loss of Service/Tied accommodation	16	2.8	13	2.2	5	0.9	13	2.2	6	1.1
Forced Division/Sale of matrimonial home	14	2.5	15	2.6	7	1.2	11	1.9	5	0.9
Harassment	12	2.1	13	2.2	9	1.6	14	2.4	15	2.8
Applicant terminated secure accommodation	7	1.2	10	1.7	12	2.1	10	1.7	7	1.3
Emergency-Fire/flood etc.	7	1.2	13	2.2	2	0.3	11	1.9	18	3.3
Other reason for loss of accommodation	5	0.9	3	0.5	1	0.2	6	1	0	0
Fleeing non-domestic violence	2	0.4	6	1	8	1.4	6	1	7	1.3
Total	**564**	**100**	**587**	**100**	**574**	**100**	**578**	**100**	**538**	**100**

Source: HL1 data

6.   Temporary Accommodation

The Council has continued to reconfigure its supply of temporary accommodation since 2010/11. It has reduced the number of expensive units (i.e. private sector leasing, RSL accommodation, DHE accommodation etc.). This was to lessen the costs for homeless households and the Council. At 31 March 2019, 198 units of temporary accommodation were available for occupancy. Of these, 147 units were occupied with an average length of stay of 86 days. A further 25 units were empty due to the Royal contract ending, and 23 properties (across all providers) were void 3 were waiting a new tenant.

Current provision includes self-contained, dispersed temporary accommodation; supported temporary accommodation and these are spread across Moray. The accommodation is mainly drawn from existing social rented stock (58%) rather than specialist supported housing facilities.

The Head of Housing and Property, in consultation with service managers, determines the number of temporary accommodation units required to meet statutory homelessness duties. The fit between supply of, and demand for, temporary accommodation is subject to continuous monitoring, re-assessment and reconfiguration. This flexible approach allows the Council to **minimise the cost of** temporary accommodation, ensure stock is provided in required locations, and minimise the use of bed and breakfast.

Temporary accommodation at 31 March 2019 includes:

Cameron Parkbrae, Elgin
This is a local authority owned, purpose built, hostel which was opened in July 1996. It is funded from General Services. It has 10 units of self-contained furnished accommodation (3 bedsits, 5 x 1 beds and 2 x 3 beds). It also has two offices. The facility is open 24/7 and incorporates the first point of contract for the Council's Out of Hours service.

Quarryhill, Keith
This is the oldest hostel used by the Council. It is also funded from General Services. Quarryhill has a caretaker flat and 6 bedsits for single homeless people. It has shared cooking and bath/shower/toilet facilities. The property is registered as a House in Multiple Occupation (HMO). It fails the Council's own standards for the provision of temporary accommodation due to the shared facilities. The HMO license is due to expire on 29 November 2019.

St Andrews Square, Buckie
This is a purpose built hostel with 13 units of self-contained furnished accommodation. It is leased from Langstane Housing Association and opened in July 2009. It is funded from General Services and has 8 x 1 bedrooms, 5 x 2 bedrooms and 1 office.

Dispersed Properties (Council/RSL)
There are 103 Council and 11 RSL dispersed properties. These are located across Moray. The Council makes provision to rotate temporary tenancies after 3 years (or

sooner if circumstances dictate). A total of 65 properties currently fall into this category.

Supported Accommodation
The Council has 30 units of supported accommodation which are all managed through 3 external housing support contracts. The funding of these comes from General Services.   Two contracts are with SACRO who provide shared accommodation at Guildry House, Elgin and Covesea Road, Elgin. The remaining contract is with Moray Women's Aid for Marleon House, Elgin.

Guildry House, Elgin
This provides 10 units of shared accommodation for single people with alcohol/substance dependency. The property is leased from Langstane Housing Association. The service is funded from General Services on a 3 year contract which is due to expire on 30 June 2019.

Covesea Road, Elgin
This provides 10 units of shared accommodation services for young people aged 16 to 24. The property is leased from Langstane Housing Association. The service is currently funded from General Services on a 3 year contract which is due to expire on 30 June 2019.

Marleon House, Elgin
This provides accommodation with support to women who are at risk of, or who are, fleeing domestic abuse. This is a purpose-built hostel owned by Langstane Housing Association. The building has 7 self-contained units (2 x bedsit, 3 x 2 bedrooms and 2 x 3 bedrooms). Moray Women's Aid also lease 3 dispersed properties in the community from the Council (2no. 1 bed and 1no. 2 bed). The contract with MWA is due to expire on 31 March 2020.

The Royal, Forres
The Council has a contract to lease 25 units of bedsit accommodation from the private sector. The accommodation has individual rooms but all other facilities (cooking, bathroom, shower and toilets) are all shared. The Royal is a registered HMO and currently it fails the Council's own standards for temporary accommodation due to shared facilities. The service is funded by General Service Account and ended on 31 March 2019.

Table 10 illustrates temporary accommodation (by type) and the number of households who were placed there in 2018/19:

Table 10: Overarching type of provision	Temporary Accommodation Type	No. of households living in the TA at 31 March 2019	Total households who have entered accommodation between 1 April 2018 and 31 March 2019	Total households who have left accommodation between 1 April 2018 and 31 March 2019 (placements ending)	Estimated occupancy in the year
Emergency	5.6 Bed and breakfast	**0**	**2**	**2**	**2**
Interim	5.1 LA ordinary dwelling	96	259	341	355
	5.2 Housing association / RSL dwelling	20	54	68	74
	5.3 Hostel - local authority owned	4	12	28	16
	5.4 Hostel - RSL	19	10	72	29
	5.5 Hostel - other	0	70	117	70
	5.7 Women's refuge	7	11	19	18
	5.8 Private sector lease	0	3	4	3
Interim Total		**146**	**419**	**649**	**565**
Other	5.9 Other placed by authority	**1**	**0**	**3**	**1**
Grand Total		**147**	**421**	**654**	**568**

Source: Moray Council records

Emergency Accommodation
Bed and Breakfast accommodation is only used in emergency situations. It remains the option of last resort. In 2018/19, 2 households were placed in this accommodation but none breached the Homeless Persons Unsuitable Accommodation) Scotland Order (Amended 2017).

As at 1 April 2019, the Council had 173 units of temporary accommodation.

7. Affordability

The Local Housing Allowance (LHA) represents the maximum amount of rent that can be paid through Housing Benefit/ Universal Credit, and is determined by the household size. In Moray there are significant differences between the LHA and average market rents. LHA rates are based on rents and are limited by legislation. In Moray LHA rates have been reduced over time.

Table 11 compares average local private sector rents with LHA rates and shows there is a significant shortfall between the two. Where rent is higher than the LHA payable, the tenant must make up the difference from their income. The shortfall is greatest in the 1 bed shared rate applicable to households aged under 35, usually single person households.

Table 11: Private Sector Rent/ LHA comparison 2016					
Property size	Median Rents Highlands and Islands 2016		LHA 2015-2020	Difference	
	per month	per week	per week	%	£
1 bed shared rate (applicable to <35s)	£338.00	£78.00	£60.81	**28.27%**	£17.19
1 bedroom	£480.00	£110.77	£91.81	20.65%	£18.96
2 bedrooms	£575.00	£132.69	£110.72	19.84%	£21.97
3 bedrooms	£695.00	£160.38	£126.92	26.37%	£33.46
4 bedrooms	£875.00	£201.92	£160.38	25.90%	£41.54

Source: https://www.gov.scot/publications/private-sector-rent-statistics-2010-2018/pages/10/

Moray's incomes are the lowest amongst comparators at the 10th decile and lower quartile (25%), and differences are more apparent at lower income. In Moray, a Minimum Wage earner has to reach the age of 21 before earning lower quartile earnings (£13,600 per annum), and only then if they are in full time employment. In addition, many local employers only offer part time, seasonal, or insecure employment.

The HNDA 2017 found that only:

- 45% of households can afford lower quartile house purchase;
- Lower quartile income households could afford to buy properties priced at no more than £54,520;
- Only 50% of households can afford to rent from the open market; and
- Lower quartile income households could afford rents of not more than £65.53 per week/ £283.96 per calendar month.

The LHA 1 bed shared rate, and differences between average market rents and the LHA are making the private rented sector less affordable in general; to households under 35 in particular; and may be contributing to the predominance of younger, single persons amongst Moray's homeless households. T

hese factors are out-with the control of the Council but clearly show the challenges that the people of Moray face in terms of avoiding homelessness. It also demonstrates the pressure that the Council faces in providing affordable temporary and permanent accommodation.

Temporary Accommodation Charging Policy

The policy aims to ensure that the rent charged for temporary accommodation is affordable to all, whilst ensuring that it does not act as a disincentive to work and that rent is recovered to its maximum potential.

The specific objectives are to:

- use a cost effective and fair rent setting process,
- ensure temporary accommodation is an affordable option to all; and
- use recovery practices which take account of a household's income and their ability to pay.

The Policy states "When setting the rent level for temporary accommodation, the Council will charge every household the same level of rent, regardless of income. However, in order to ensure that temporary accommodation is an affordable option to all, the Council will only seek to recover those costs that it can reasonably be expected to collect.

The level of rent charged for temporary accommodation will be set in accordance with the Local Housing Allowance, plus a £45 management fee. The management fee seeks to recover the cost of decoration, voids, electric/gas checks, deliberate damage, furnishings and floor-coverings".

Table 12 provides details of the rent levels charged by property size:

Table 12: Temporary accommodation rents		
Property size	**2019/20 Rent charged (including management fee) on full Housing Benefit**	**2018/19 Rent payable by tenant (average council rent +10% towards management fee) on partial Housing Benefit/Not entitled to Housing Benefit**
Single room rate for under 35 years/ Bedsit	£105.81 per week	£45.00 per week
1 bedroom	£136.81 per week	£60.68 per week
2 bedroom	£155.72 per week	£71.25 per week
3 bedroom	£171.92 per week	£82.22 per week
4 bedroom	£205.38 per week	£102.53 per week

Source: Moray Council records

As part of the Council's annual budget setting process, rent charges are reviewed. Annual increases in rents are influenced by the property size, the household type and capping levels imposed through Local Housing Allowance and welfare reform. Performance relating to the operation of this policy has been reported annually to the Council's Communities Committee. Since 2015, the number of tenants leaving temporary accommodation in arrears has reduced; more income has been collected than was originally expected and complaints relating to the affordability of temporary accommodation have significantly reduced.

RRTP Priorities – Temporary Accommodation

i)   The contract for the Royal (**25 single person units)** ended on 31 March 2019. During 2018/19, the Council increased the number of dispersed units to ensure that it did not have to rely on bed and breakfast accommodation to fulfill its homelessness duties. The Royal was not popular with homeless households; it accounted for a significant number of temporary accommodation refusals; and it failed the Council's own standards for temporary accommodation.   Savings from the Royal contract have been used by the Council to help balance the General Services Account for 2019/20.

ii)   At 1 April 2019, the Council had 173 units of temporary accommodation. Of these, 65 were dispersed properties that have been in use for 3+ years. The Temporary Accommodation Policy allows tenancies of this age to be rotated. It is not practical or sensible however to do this over a short period of time. The RRTP intends to give first priority to families with children who are currently in temporary accommodation providing the property is suitable for their needs. This will result in a planned reduction of **20** units in 2019/20. (**YEAR 1**)

iii)   Further reductions will continue based on the 3+ year rotation policy will continue in future years. Families with Children, Condition, Cost and length of time that a property has been used as temporary tenancy will be the main consideration when deciding which properties should be returned to mainstream let. Where appropriate, tenants in residence will be given a permanent let. Planned reductions are provided in **Table 13**:

Table 13	Number	RRTP	Comment
2019/20	20	Year 1	This figure excludes the Royal which has ended on 31 March 2019
2020/21	10	Year 2	
2021/22	20*	Year 3	Reduction figure includes the possible closure of Guildry House, Elgin
2022/23	10	Year 4	
2023/24	16	Year 5	Reduction figure includes the possible closure of Quarryhill, Keith

Note: These reductions are based on an assumption that there will be no significant increase in homelessness over the same period.

iv)   A review of Guildry House* is planned for 2021/22. This is accommodation that fails the Council's own standards for temporary accommodation due to shared facilities. If it is decided to end the contract by 31 March 2021, this will lead to a further reduction in the number of 10 units in 2021/22. If Guildry House is retained the figure of 20 units is still reasonable and will be achieved from a further reduction within dispersed accommodation. Guildry House is owned by Langstane Housing Association and leased to the Service Provider (**SACRO**). The property can be converted back into 6 residential flats (permanent lets) and some of these will be suitable for residents placed in this accommodation. As an additional safeguard, the Council will also increase the number of Housing First properties in 2021/22 to 20. (**YEAR 3**)

v)   A review of Quarryhill is planned for 2023/24. This accommodation fails the Council's own standards for temporary accommodation due to its shared facilities. An additional 6 units have been built into the projections for 2023/24 in anticipation of its closure. (**YEAR 5**)

NOTE: No savings have been factored into the RRTP at this stage to reflect possible closures. This will need to be considered at an appropriate point in the RRTP should it be decided to progress closures.

8. Housing Supply Target and Investment

The HNDA 2017 found that 1,179 affordable homes would be needed over 2018-2023, and that there is a significant shortfall in availability of affordable housing. The high proportion of single person homeless households has resulted in significant pressure on 1 bed social rented housing, both from temporary accommodation use and as an affordable permanent housing option.

The Local Development Plan affordable housing policy (H8) requires 25% of new housing developments to be "affordable" and that in the majority of cases this affordable housing is provided within the site. The affordable housing mix must be agreed with Housing as part of the planning process. The definition of what we regard as affordable is set out in Policy H8. Housing is routinely consulted on planning applications falling within the scope of Policy H8 and the policy is enforced equitably and usually supported by a Section 75 agreement. The vast majority of affordable housing delivered in Moray is sourced through this policy via Section 75 agreements.

The Housing Supply Target (HST) will be detailed in the forthcoming draft LHS 2019-2024 which will be subject to extensive public consultation. However, it is likely that the HST will consolidate practice over the last 3 years, i.e. to provide approximately 20-30% of affordable housing completions in the form of 1 bed flats for social rent, with the aim of increasing supply of housing under the greatest pressure from demand arising from single homeless households. The HST will be disaggregated to Housing Market Area (HMA) level and tenure e.g. social rent, intermediate tenures e.g. mid-market rent or shared equity. Approximately half of Moray's households live in the Elgin HMA and therefore approximately half of the Housing Supply Target provision assigned to Elgin HMA.

Scottish Government funding for affordable housing is set out and prioritised in the Strategic Housing Investment Plan (SHIP) which is refreshed annually and published on the Council's website. The 2019 SHIP was not yet complete at the time of writing but the projected completions of affordable housing are likely to be similar to those presented in the table below:

Table 14: Projected completions of Affordable Housing	2019/20	2020/21	2021/22	2022/23	2023/24	Total
No of Completions	66	316	306	351	68	**1,107**

Source: Draft Moray SHIP 2019

The Council is the biggest participant in the SHIP through its own prudential borrowing. The Housing Business Plan (2016) currently makes provision for 70 units of new build housing per year until 2020/21. A further review of the Housing Business Plan will be completed in 2019. It is unlikely that the number of affordable units delivered through the SHIP will match those required within the HNDA 2017, due to limited investment funding.

The HNDA 2017 found that approximately half of all homeless households in Moray are single person households. The HNDA also found a mismatch between the size

and type of affordable housing required and what is available. Throughout the term of the LHS 2013-18 Moray Council has sought to use its new build investment funding to rebalance supply with demand. This has resulted in approximately 20-30% of new affordable housing units included in the SHIP 2017 being built in the form of 1 bed general needs flats for social rent. The vast majority of these will be council houses.

The forthcoming LHS 2019–2024 will include continuation of this approach to social housing mix in its Housing Supply Target, with the aim of increasing supply of permanent and temporary housing options in the public sector. The public consultation on the draft LHS ended on 15 March 2019; the final LHS was approved by Council on 2 April 2019; and the approach suggested above will continue.

The Toolkit supplied alongside the Scottish Government's guidance provides a statistical analysis of the shortfall in supply required to achieve rapid rehousing within 5 years. In Moray, the toolkit has identified **a shortfall of 635 lets over 5 years (127 lets per year)** to be allocated to statutorily homeless households.

Homeless households are significantly less likely to require sheltered and extra care housing. Also the turnover rate for sheltered/extra care housing is significantly higher than for general needs stock. Therefore, for the purposes of the RRTP, sheltered/ extra care housing allocations have been separated, in an effort to accurately represent availability to homeless households.

By the end of 2020/21, the Council's new build programme will have added a further 164 properties to the Council's housing stock. This will increase the stock to 6,126 properties. Although RSL development projects are included in the SHIP 2018, delivery dates still need to be finalised.

Based on 2018/19 figures, the Council allocated 46.2% of its general properties to homeless households. By comparison, RSL allocated around 53%.

How the Council allocates its housing

The Council allocates its own vacancies from 3 separate housing lists – Waiting, Transfer and Homeless Lists. A quota system is applied to each list – Waiting (40%), Transfer (20%) and Homeless (40%). Each list allows a quota target tolerance of 5 +/-. These quotas aim to strike an appropriate balance between all needs groups and are reviewed on an annual basis. The Waiting and Transfer list applications are prioritised using a points-based system, and Homeless List applicants are rehoused chronologically.

If the Council was not taking forward the key changes identified within the RRTP, the shortfall in lets to homeless households would continue at **127**. This shortfall could be addressed by increasing the quota of general needs lets to the homeless list from 40% to 70%. This would significantly disadvantage applicants on the Waiting and Transfer lists. Such an increase could inadvertently result in an increase in homeless applications, as a perception could emerge amongst the general public that this is a quicker, or only, route into social housing. This perverse incentive would be contrary to the aims of HARSAG and the Scottish Government. An increase in homelessness was evident in the period leading up to the removal of the priority need test in December 2012.

A modelling exercise of the existing allocation quotas, matching this to current lets (both Council and RSL) has enabled the Council to reach a sensible conclusion in terms of what the allocations quotas should be for 2019/20. **Table 15** provides a simple overview of the planning assumptions used to influence the revised housing list quotas and changes made to our Allocations Policy from 1 May 2019:

Table 15:	2018/19 Re-lets (excludes new build)						Modelled 2020/21 allocations						Change +/-	
General Needs Lets	**Council**		**RSL**		**Total**		**Council**		**RSL**		**Total**		**2019/20**	**2020/21**
Homeless List	162	46.2%	67	53%	229		200	50%	68	52%	268		+ 35	+ 38
Waiting List	112	31.9%	34	27%	146		128	32%	36	28%	165		+ 15	+ 18
Transfer List	77	21.9%	25	20%	102		72	18%	26	20%	98		-5	-4
Total	**351**	**100%**	**127**	**100%**	**478**		**401**	**100%**	**130**	**100%**	**532**			

Source: Moray Council records – Figures will not sum due to rounding.

While on paper there would continue to be a shortfall in provision, this takes no account of the additional measures that are set out to be delivered as part of the RRTP or the reduction targets that are proposed against each action. This includes:

YEAR 1
- Additional Units from increasing the quota for the homeless list – **Target = 35 properties**

- Fast- track health and housing assessments to reduce homelessness/need for temporary accommodation - **Target = 20 households**);

- Pro-actively reduce the number of households already in temporary accommodation - **Target = 20 households);**

- Provide additional housing support towards reducing evictions (Council/RSL and Private Sector) – **Target = 25 households:**

- Provide additional housing supports targeted towards tenancy sustainment – **Target = 30 households**;

These combined actions and their respective targets are deemed reasonable providing resources are made available from Scottish Government to deliver the intended outcomes. Additional lets to homeless households from the revised quotas (35) plus the other targets for reducing homelessness (95 households) has the potential to deliver **130** positive outcomes in 2019/20 for those who are homeless or at risk of homelessness. This compares with the original property shortfall of **127** units.

Table 16 presents the revised allocation quotas for 2019/20:

Table 16:	Quotas for 2019/20	Variation
Homeless List	50%	+/- 5%
Waiting List	32%	+/- 5%
Transfer List	18%	+/- 5%

Source: Council Housing Allocation Quotas – 2019/20

These quotas will be reviewed on an annual basis.

Registered Social Landlords

Locally, most RSL's operate a Choice Based Lettings model when allocating their housing stock. Further discussions will take place with each of them to ensure that collectively the number of allocations identified as part of the modelling exercise is delivered.

Other actions involving the RSL's will include:

- A review of Nomination and Section 5 agreements;
- How RSL's can support the fast-tracking of households into their accommodation avoiding homelessness where possible;
- A review of how they support vulnerable tenants; and
- A review of their homeless prevention and eviction policies.

RRTP Priorities – Permanent Accommodation

i) On 28 May 2019, the Communities Committee will be asked to approve the revised quotas set out in Table 14 of the RRTP. (**YEAR 1**)
ii) Additional units for homeless households as part of the revised quotas - 38 properties. (**YEAR 1**)
iii) Other targets proposed within the RRTP to reduce homelessness and justify the allocations quotas for 2019/20 will also be monitored. (**YEAR 1**)
iv) A meeting with RSL partners to review temporary accommodation rent charges (St Andrews and dispersed), nomination agreements, Section 5 arrangements and key policies to reduce evictions and tenancy breakdowns within RSL properties will be progressed early in 2019/20. (**YEAR 1**)

Note: These combined outcomes plus the actions proposed for YEAR 2 will inform the Council's allocations quotas for 2020/21 and beyond.

9)   PARTNERSHIP APPROACH

The Council works with a range of Council Services/Partners to deliver services for homeless households. The RRTP requires a new discipline with regards to the individual/collective contributions that each will make to improve the outcomes for those who are homeless or at risk of homelessness.

Moray Integration Joint Board

The MIJB is able to provide specialist support not immediately available within the Housing Service. Access to such services will be essential to help vulnerable households move into and thereafter sustain their own accommodation. In 2019/20, the RRTP will develop an approach involving Housing and the MIJB to support the smooth transition of vulnerable households into Adult Services. This approach will include the Council's Drug and Alcohol Team and other addiction services such as Arrows. Household's eligible for long term support will include a significant proportion of Housing First cases.

Moray Fresh Start (MFS)

Moray Fresh Start currently offer starter packs for homeless households. This enables them to move earlier into their own accommodation. Discussions are at an early stage to establish if MFS can take on a wider role providing basic furnishings to homeless households or those at risk of homelessness. To promote tenancy sustainment, properties identified for Housing First will be furnished prior to entry.

Moray Foodbank

The Council has started working in partnership with Moray Foodbank. Food can now be accessed direct from homeless hostels. Further engagement will be progressed see if the service can be extended.

Citizens Advice Bureau

The Homelessness Service provides £30k per annum to the Citizens Advice Bureau. This is to provide independent advice to those who are homeless or at risk of homelessness. Further discussions with CAB will establish what further assistance they can provide to this client group.

Persons with no recourse to public funds

The HNDA found that "no significant increases in temporary accommodation are anticipated to meet the housing needs of refugees and/or asylum seekers."

Historically there have been very few occasions where the Council has provided services, including temporary accommodation, to persons without recourse to public funds. Where these cases have arisen, the Council has adopted a multi-agency approach which is flexible and which provides advice and assistance, including financial assistance where required in order to safeguard the health and wellbeing of

the person and their household if applicable. This approach will continue during the period of the RRTP.

The Council recognises the need to further develop its approach to partnership working. All areas identified for development will be progressed in 2019/20. Costs relating to this work will be contained within existing budgets. No additional costs are being requested for these areas of development.

All areas of development will be progressed in 2019/20. (**YEAR 1**)

Prevention
Temporary Accommodation
Permanent Accommodation
Working with Partners

Action	What is in Place Already	Resources Required	Bid(£)	Other Comments or Future Action
Prevention				
Fast Track health and housing assessments	1 x Occupational Therapist who carries out health/housing assessments	Additional OT x 1 (Grade 9)	51,346	Prevention Target = 20 households - High Priority
Enhance Housing Support for vulnerable households to prevent homelessness	Housing Support Service currently work with 192 vulnerable households. This additional resource will allow the Council to do more prevention activities with more households	Housing Support Assistant x 1 (Grade 7)	35,857	Reduce Evictions - Target 25 households
		Housing Support Worker x 1 (Grade 4)	26.305	Improve Tenancy Sustainment -Target 30 households
		Housing Support Worker x 1 (Grade 4)	26.305	Reduce the number of households in T/A - Target 20 households
Policy and Procedures relating to Housing Options/Homelessness to be updated as part of RRTP	The Council's Policy Team in funded mainly from the HRA. This post will concentrate on Homeless Services	Housing Policy Officer x 1 FTE (Grade 8)	42,844	Post will develop and review policies relating to homelessness and the RRTP
Training to be arranged through the North East, Highlands and Islands Homelessness Hub Group	Training is currently ad-hoc but will now be supported by a Training Plan developed through the HUB	No cost envisaged	0	Year 1 to include poverty and how this impacts on vulnerable households
	The training proposed will be aimed at those working with homeless households across the HUB areas			Year 1 to include physical/mental health and how this impacts on vulnerable households
Training to be delivered to Housing Options/Homelessness Teams on financial/benefits advice	Training will be delivered by Corporate Training Team/Financial Inclusion Teams	No cost envisaged	0	Year 1 -awareness of financial services/benefit advice/Income Maximisation
Develop the Council's approach to Housing First collectively with Partners	The new service will be based around the Council's scatter flat initiative with minor adjustments	Housing Policy Officer to develop the Council's approach with partners (See line 15)	0	The policy needs to be in place by 1 April 20120
Develop an annual training programme relating to homelessness and prevention	Training is delivered in an adhoc manner. The Training Plan will focus on good practice and be mandatory for relevant staff.	Housing Policy Officer will develop the Training Plan (See line 15)	0	The plan will be developed during Year 1 and will become a mandatory requirement for relevant staff
Review Prevention activities with Citizens Advice Bureau and agree prevention targets	The Council provides £30k per annum to provide independent advice to those who are homeless or at risk of homelessness	Service Managers will meet with CAB to agree revised prevention targets	0	This may lead to further prevention targets in future years
Review RSL policies relating to rent arrears/evictions to reduce tenancy breakdown/failure	RSL's have their own policies relating to each service area but these now need to reflect a prevention agenda	Policy Officer will update both documents (see line 15)	0	RSL's will be asked to take on a greater role in terms of homeless prevention
Develop the Council's approach to deliver a Family Mediation Service with the aim of preventing homelessness	The majority of homeless households come from people leaving family/friends. No mediation is currently offered	Policy Officer in consultation with service managers will design a mediation service fit for purpose	0	Mediation will be an enhancement of the Council's approach to preventing homelessness
Temporary Accommodation				
Temporary Accommodation to be reduced by 20 units - Families with children to be prioritised	At 1 April 2019 the Council had 173 units of temporary accommodation	Reduction will be achieved using existing resources	0	

Meet with RSL's to discuss the rent they charge for properties they provide for temporary accommodation	RSL rents are higher than rents charged for Council T/A. Most RSL properties are subsidised by the Council	Senior Managers to discuss with RSL's with the aim of reducing costs	0	Cheaper accommodation will reduce poverty levels for households on low incomes placed in T/A
Set annual reduction target for time spent in temporary accommodation based on homelessness outcomes 2019/20	Potential increases/decreases in homelessness will help inform a realistic target for reducing time spent in temporary accommodation	Policy Officer in consultation with service managers will determine target for 2020/21	0	No additional cost
Permanent Accommodation				
Revised Quotas for the housing allocations policy to be agreed on 28 May 2019	Allocation Policy and Quotas agreed on an annual basis	35 additional properties in Year 1 will be generated as part of the revised quotas	0	No additional resources required
Meet with RSL Partners to review Nomination Agreements and Section 5 referrals	Both these agreements are in place but need to be updated to reflect the priorities set out in the RRTP	Policy Officer will update both documents (see line 15)	0	The revision of these policies is expected to increase the number of permanent lets to homeless households
Working with Partners				
Develop services with MIJB for vulnerable	Housing Liaison Group in place; Good links with MIJB; Collective approach	Housing/MIJB Managers to develop joint approach to	0	This approach will consider the possibiliy of co-location of
Begin discussions with Moray Freshstart to	Enhanced Service Provision (to include basic furniture) with MFS	Discussions will be progressed with MFS in 2019/20	0	A new service will need to be in place by 1 April 2020
Extend the services offered by Moray Foodbank	The Council attends the Moray Poverty Forum and there is a willingness to		0	Food Poverty will be an area progressed by the Council and
		YEAR 1	Total Bid £182,657	These costs will be recurring in YEAR 2

Recurring Costs carried forward from the previous year				
Prevention				
Temporary Accommodation				
Permanent Accommodation				
Working with Partners				

Action	What is in Place Already	Resources Required	Bid	Other Comments or Future Action
		Recurring Costs carried forward from the previous year	**£182,657**	
Prevention				
Collaborate approach with MIJB in place	Housing Liaison Group in place; Good links with MIJB; Collective approach to be developed for homeless households	Enhanced services in place for those who are homeless or at risk of homelessness	0	New approach will be developed within existing resources
Family Mediation Service in place based within the Housing Options Team	Service enhancement as developed in 2019/20	Family Mediation Assistant x 2 (Grade 6)	67082	These posts will be recruited by 1 April 2020
Housing Options Approach to be further developed using Housing Options Toolkit	Service enhancement to be developed during 2020/21	Policy Officer will develop the Council's approach using toolkit	0	No additional cost
Review of annual vulnerablity indicators (linked to Housing First)	Reviews will be completed by the Policy Officer	Policy Officer (already in place)	0	No additional cost
Temporary Accommodation				
Temporary Accommodation to be reduced by 10 units - Natural Rotation of tenancies 3+ years	Annual reconfiguration of temporary accommodation delegated to the Head of Housing and Property	Reduction to be achieved within existing resources	0	Review will completed using existing resources
Set annual reduction target for time spent in temporary accommodation based on homelessness outcomes 2020/21	Potential increases/decreases in homelessness will help inform a realistic target for reducing time spent in temporary accommodation	Policy Officer in consultation with service managers will determine target for 2021/22	0	No additional cost
Permanent Accommodation				
Housing First in place providing 15 properties for households with complex needs	Implment Housing First Model developed in Year 1	Housing Support Worker (5 x FTE) @ Grade 4 (Basic salary)	131,525	These posts to be recruited by 1 April 2020. The number of units assumes no significant increase in the number of households requiring Housing First
Plus Bank Hours for "wrap around" support (2 hours support per tenancy (15) per day 24/7 = 10,920 hours	Time plus 1/3 is paid from 8.00pm to 12.00 midnight and Saturday/Sunday (all day). Time plus 1/3 equates to £16.44 per hour	10,920 hours required at Time plus 1/3 x £16.44	179,525	These hours reflect that Moray is mainly a rural area. Providing wrap around support will require staff to travel - all mileage costs will be asorbed by the Council and are excluded from this submission
Plus Bank Hours for "wrap around" support (4 hours support (7) public holidays per tenancy (15) = 420 hours	Double time is paid for public holidays or a Sunday if staff have already met their core weekly hours (37). Double Time equates to £21.92 per hour	420 hours required at Double Time x £21.92	9,206	
Void Rent Loss to the HRA linked directly linked to Housing First	Average Weekly Rent for 1 bedroom = £50.69 - Costs assessed over 15 properties anticipating an average 4 weeks delay		3,042	Costs associated with potential rent loss deemed reasonable

Properties will be decorated in line with the Council's decoration policy relating to vulnerable households	Costs for these works are currently met in full by the Housing Revenue Account	No additional resources required	0	Costs per unit is anticipated to be in the region of £1,800 per unit = £27,000 for 15 units
Review Housing Allocation Quotas for 2020/21	Allocation Policy and Quotas agreed on an annual basis	Review to be completed within existing resources	0	Number of additional properties in Year 2 to homeless lets to be determined as part of the revised quotas
Working with Partners				
Basic Furniture included within the starter packs provided by Moray Fresh Start	Costs linked to Scotland Excel Furniture Contract	15 x 1 bedroom properties @ £1,600 per unit	24,000	
Prevention of Homelessness Target agreed with Citizens Advice Bureau	Service is already funded but revised target needs to be agreed with CAB	The Homelessness Service already funds the service (£30k per annum)	0	Any target agreed may influence future allocation quotas

YEAR 2	Total Bid £597,037

	Colour Key
Recurring Costs carried forward from the previous year	
Prevention	
Temporary Accommodation	
Permanent Accommodation	
Working with Partners	

Action	What is in Place Already	Resources Required	Bid	Other Comments or Future Action
		Recurring Costs carried forward from the	**£597,037**	
Prevention				
Review Housing Options and Homelessness Approach (Mid-Point Review)	Review key actions implemented as part of the RRTP (YEARS 1 and 2)	Work to be completed by the Policy Officer	0	No additional cost
Review annual Training Needs for Housing Options and Homelessness staff	Update Training Plan for Housing Options and Homelessness staff in consultation with Highlands and Islands HUB	Work to be completed by the Policy Officer	0	No additional cost
Review of annual vulnerablity indicators (linked to Housing First)	Reviews will be completed by the Policy Officer	Policy Officer (already in place)	0	No additional cost
Temporary Accommodation				
Reduce Temporary Accommodation to be reduced by 20 units - Natural Rotation of tenancies 3+ years	Annual reconfiguration of temporary accommodation delegated to the Head of Housing and Property	Reduction to be achieved within existing resources	0	Increase to reflect potential closure of Guildry House
Set annual reduction target for time spent in temporary accommodation based on homelessness outcomes 2021/22	Potential increases/decreases in homelessness will help inform a realistic target for reducing time spent in temporary accommodation	Policy Officer in consultation with service managers will determine target for 2022/23	0	No additional cost
Permanent Accommodation				
Housing First in place providing 20 properties for households with complex needs	Increase linked to possible closure of Guildry House	Possible impact on HRA in Year 3 - (additional rent loss)	1014	Increase applied for 1 year only. The number of units assumes no significant increase in the number of households requiring Housing First
Review Housing Allocation Quotas for 2021/22	Allocation Policy and Quotas agreed on an annual basis	Review to be completed within existing resources	0	Number of additional properties in Year 4 to homeless lets to be determined as part of the revised quotas
Working with Partners				
Basic Furniture included within the starter packs provided by Moray Fresh Start	Costs linked to Scotland Excel Furniture Contract	5 additional 1 bedroom properties @ £1,600 per unit	8,000	
Review of Partner contributions in delivering the RRTP - (Mid-Point Review)	Policy Officer will complete this review	Cost of Policy Officer already factored into the RRTP	0	Areas for Improvement identified and factored into YEARS 4 & 5

	YEAR 3	Total Bid £598,051

Recurring Costs carried forward from the previous year				
Prevention				
Temporary Accommodation				
Permanent Accommodation				
Working with Partners				

Action	What is in Place Already	Resources Required	Bid	Other Comments or Future Action
		Recurring Costs carried forward from the previous	£598,051	
Prevention				
Training Plan to be updated	Policy Officer will update as per annual requirement	Work to be undertaken by the Policy Officer	0	No additional cost
Policy and Procedure update following Mid- Point Review	Policy Officer will update as per annual requirement	Work to be undertaken by the Policy Officer	0	No additional cost
Review of annual vulnerablity indicators (linked to Housing First)	Reviews will be completed by the Policy Officer	Policy Officer (already in place)	0	No additional cost
Temporary Accommodation				
Temporary Accommodation to be reduced to 10 units - Natural Rotation of tenancies 3+ years	Annual reconfiguration of temporary accommodation delegated to the Head of Housing and Property	Reduction to be achieved within existing resources	0	Tenancies handback reduces in Year 4
Set annual reduction target for time spent in temporary accommodation based on homelessness outcomes 2022/23	Potential increases/decreases in homelessness will help inform a realistic target for reducing time spent in temporary accommodation	Policy Officer in consultation with service managers will determine target for 2023/24	0	No additional cost
Permanent Accommodation				`
Housing First in place providing 15 properties for households with complex needs	This is a decrease on the previous year therefore reduction in possible HRA rent loss	Void rent loss reduced to reflect reduction	1014	Reduction factored into Year 4 bid. The number of units assumes no signficant increase in the number of households requiring Housing First
Review Housing Allocation Quotas for 2022/23	Allocation Policy and Quotas agreed on an annual basis	Review to be completed within existing resources	0	Number of additional properties in Year 3 to homeless lets to be determined as part of the revised quotas
Working with Partners				
Implement any improvement actions identified in relation to Partners and how they support the RRTP	Senior Managers/Partners/Policy Officer to implement any recommendations from the mid point review	Changes to be implemented within existing resources	0	No additional cost

YEAR 4	Total Bid £597,037

		Recurring Costs carried forward from the previous year
Prevention		
Temporary Accommodation		
Permanent Accommodation		
Working with Partners		

Action	What We Do Already	Resources Required	Bid	Other Comments or Future Action
		Recurring Costs carried forward from the previous year	**££597,037**	
Prevention				
Review Hospital Discharge Protocol, Armed Forces Protocol and Prison Protocols ahead of Year 5	Reviews will be completed by the Policy Officer	Policy Officer (already in place)	0	No additional cost
Review Training Plan	Update required for YEAR 5	Policy Officer (already in place)	0	No additional cost
Review RRTP over the 5 year period	The review should inform the future direction of Homelessness Services in Moray	Policy Officer (already in place)	0	No additional cost
Prepare new RRTP on the basis that further homeless reduction activities are likely to be required	To be informed by direction from Scottish Government	Policy Officer (already in place)	0	No additional cost
Review of annual vulnerablity indicators (linked to Housing First)	Reviews will be completed by the Policy Officer	Policy Officer (already in place)	0	No additional cost
Temporary Accommodation				
Review of Quarryhill, Keith to consider closure	Service Managers to lead the review and decide whether the Service should close	Reduction to be achieved within existing resources	0	
Temporary Accommodation to be reduced by 16 units - 10 (3+ years) - Possible closure of Quarryhill (6 units)	Annual reconfiguration of temporary accommodation delegated to the Head of Housing and Property	Reduction to be achieved within existing resources	0	**Handbacks over the 5 year period assumes no significant increase in homelessness**
Set annual reduction target for time spent in temporary accommodation based on homelessness outcomes 2023/24	Potential increases/decreases in homelessness will help inform a realistic target for reducing time spent in temporary accommodation	Policy Officer in consultation with service managers will determine target for 2024/25	0	No additional cost
Permanent Accommodation				
Housing First in place providing 15 properties for households with complex needs	Consistent figure based on the previous year	No additional resources required	0	The number of units assumes no significant increase in the number of households requiring Housing First
Review Housing Allocation Quotas for 2023/24	Allocation Policy and Quotas agreed on an annual basis	Review to be completed within existing resources	0	Number of additional properties in Year 4 to homeless lets to be determined as part of the revised quotas
Working with Partners				
Review the role of Partners and how they have contributed	This will inform any future RRTP or future service direction	Policy Officer (already in place)	0	No additional cost

	YEAR 5	Total Bid

FINANCIAL SUMMARY		BID SUBMISSION	
YEAR 1	2019/20	£182,657
YEAR 2	2020/21	£597,037
YEAR 3	2021/22	£598,051
YEAR 4	2022/23	£597,037
YEAR 5	2023/24	£597,037
Total Bid Submission		£2,571,819

Rapid Rehousing Transition Plan   **APPENDIX 2**
Equality Impact Assessment

General Information

Assessment undertaken by *(please complete as appropriate)*

Director or Head of Service	Richard Anderson
Lead Officer for developing the policy/activity	Fiona Geddes
Other people involved in the screening (this may involve council staff, partners or others (e.g. contractor, partner or community)	Gordon McCluskey

Brief description of policy/activity

Describe the policy/activity *(see note 2):*   Rapid Rehousing Transition Plan required by Scottish Government aims to reconfigure temporary accommodation and reduce time spent in temporary accommodation over the next 5 years, which will contribute to the Government's longer term aim of ending homelessness.   The Plan forms one of the set of documents which make up the Local Housing Strategy.
Who are your main stakeholders? *(see note 3)*   Statutorily homeless households

Evidence base for assessment *(see note 4)*

Please cite any quantitative and qualitative evidence relating to groups having different needs, experiences or attitudes in relation to this policy/activity. What baseline evidence do you have already for this policy/activity?

Describe briefly the evidence you will draw on to inform this EIA.

Trends in homelessness presentations and Housing Options Service use have remained relatively stable over the last 5 years, as evidenced by the HNDA 2017.
In general, Housing Options service users are experiencing socio-economic disadvantage because they have been unable to meet their housing needs from the open private sector housing market, without assistance.
Trends in temporary accommodation use have also been stable over the last 5 years. However temporary accommodation service user feedback has shown that some types and locations of accommodation are more acceptable to users than others. Also some types of temporary accommodation show higher levels of refusals than others. This Plan offers an opportunity to redesign services and achieve service improvements.

RRTP Guidance documents suggest that a 45% increase in the number of allocations to statutorily homeless households will be required. To achieve this, the Allocations Policy quota would have to increase from 40% to 70%, which is considered inequitable.

Previous experience gained in the period preceding the removal of the "priority need test" in December 2012 showed that to increase the quota to similar levels resulted in substantial increases in the number of homeless presentations.

Moray Council believes that it is likely that allocation quota increases to the level suggested by the Guidance would run contrary to the well-established Housing Options approach.

Engagement and consultation *(see note 5)*

Thinking about people inside the council, partners and the wider community, use the table below to outline any previous engagement or consultation which is relevant to this policy/activity.

Protected groups	Engagement and consultation
Race	
Disability	Engagement as part of development of HNDA 2017
Carers (for elderly, disabled or minors)	Engagement as part of development of the HSCM Strategic Commissioning Plan
Gender or gender identify/gender reassignment	
Pregnancy and maternity (including breastfeeding)	
Sexual orientation	
Age (include children, young people, midlife and older people)	Engagement as part of development of HNDA 2017
Religion, faith and belief	
Marriage or civil partnership	
Human rights	
Socio- economic disadvantage (low income, deprived area, rural or remote area)	Engagement as part of development of HNDA 2017
Inequalities of outcome (poorer outcomes for certain people or communities)	Engagement as part of development of HNDA 2017
Staff	
Partners/contractors	Engagement with local Housing Associations as part of development of HNDA 2017, and SHIP 2017 and 2018.
Other	

Rapid Rehousing Transition Plan **APPENDIX 2**
Equality Impact Assessment

Procurement and partnerships *(see note 6)*

Is this policy/activity currently or anticipated to be carried out wholly or partly by contractors or other partners? Are they aware of their obligations to address equalities?

Briefly explain:

All procurement activity is overseen by the Corporate Procurement service.

Evidence gaps *(see note 7)*

Are there any significant gaps in the known evidence base, engagement or procurement that would prevent this EIA being completed? If so, you will need to address the gaps before finalising this EIA. Please go to Appendix 1 to assist you in developing a work plan to address the gaps.

None

Who is affected and what is the impact? *(see note 8)*

From this evidence or engagement you have already, list how this policy/activity might impact equality and/or the elimination of discrimination for each of the equality groups.		
Protected Groups	**Positive**	**Negative**
Race		
Disability		The RRTP sets the Allocations Policy quota for Homeless List applicants at 50% +/-5% for 2019/20. This slight increase will represent a slightly negative impact on Housing List applicants with a disability. To increase the Homeless List quota beyond that proposed would increase this negative impact on disabled people to an unacceptable level.
Carers (for elderly, disabled or minors)		
Gender or gender identify/gender reassignment		
Pregnancy and maternity (including breastfeeding)		
Sexual orientation		
Age (include children, young people, midlife and older people)		The RRTP sets the Allocations Policy quota for Homeless List applicants at 50% +/-5% for 2019/20. This slight increase will represent a slightly negative impact on Housing List applicants who are seeking to downsize (predominantly older) or who are overcrowded (affecting children and young people). To increase the Homeless List quota beyond that proposed would increase the negative impact on these groups to an unacceptable level.
Religion, faith and belief		
Marriage or civil partnership		

Human rights		
Socio- economic disadvantage (low income, deprived area, rural or remote area)	RRTP will provide appropriate levels of support to households experiencing severe disadvantage in the housing market, usually due to low income, housing affordability and/or availability of mortgage lending. The Charging Policy for Temporary Accommodation reduces disadvantage to homeless households in work, by ensuring that temporary accommodation is an affordable option for all.	
Inequalities of outcome (poorer outcomes for certain people or communities)	The development of a Housing First model will reduce inequalities of outcome for people who live chaotic lifestyles, experience repeat homelessness and are high consumers of NHS services	
Whole population (universal service)		
Staff		
Partners/contractors		
Other		

Rapid Rehousing Transition Plan APPENDIX 2
Equality Impact Assessment

Summary of impacts *(see note 9)*

Summarise the impacts of the policy/activity and resulting activities affect different communities and groups.
Does it create positive impacts? Yes Please explain See positive impacts outlined above for socio-economic disadvantage and inequalities of outcome.
Does it create negative disadvantage or inequalities? Yes Please explain The RRTP sets the Allocations Policy quota for Homeless List applicants at 50% (+/-5%) for 2019/20. This slight increase will represent a slightly negative impact on Housing List applicants who are: • Disabled and in housing need • seeking to downsize (predominantly older people) • overcrowded (affecting children and young people) To increase the Homeless List quota beyond that proposed would increase the negative impact on these groups to an unacceptable level. Officers believe that the proposed Homeless List quota for 2019/20 strikes a proportionate and equitable balance between all needs groups.
If you have indicated there is a negative impact on any group, is that impact *(see note 8)*: **Legal?** Yes Equalities Act 2010 **Intended?** Yes A minor change is proposed to help Moray Council deliver Scottish Government policy on RRTPs and ending homelessness.

Mitigating action *(see note 10)*

Can the impact of the proposed policy/activity be mitigated? Yes

Please explain

Maximise the impact achieved from Scottish Government More Homes Division investment funding, delivered through SHIP.

Maximise Moray Council new build housing programme completions.

Moray Council's recently agreed Revised Allocations Policy will be implemented on 1 May 2019. The Policy will introduce a new category of priority of "underuse of specialist housing". This change is intended to facilitate increased supply of specialist housing which in turn will mitigate any negative effects of the increased quota of allocations to the Homeless List on disabled people and/or older people.

The Revised Allocations Policy will also equalise the priority given to under-occupying Council tenants and under-occupying RSL tenants. This change is intended to facilitate downsizing and, as a result, to increase supply of family sized housing, which will in turn mitigate any negative effects of the increased quota of allocations to the Homeless List on families with children.

What practical actions do you recommend to reduce, justify or remove any adverse/negative impact? If more than one action, please list them in the action plan in appendix 2.

- Maintain current emphasis on increasing supply of 1 bed flats for social rent, until there is evidence that need and demand for 1 bed units has diminished. This will form part of the next Housing Need and Demand Assessment.

- Ensure application of the new "underuse of specialist housing" points rule is consistent, and in accordance with the revised Allocations Policy objectives, from 1 May 2019.

- Ensure application of the increased priority given to under-occupying social housing tenants is consistent, and in accordance with the revised Allocations Policy objectives, from 1 May 2019.

Justification *(see note 11)*

From the evidence you have and the impacts identified, what are the key risks (the harm or 'adverse impacts') and opportunities (benefits and opportunities to promote equality) this policy/practice/activity might present?
The Scottish Government requires each local authority to develop a Rapid Rehousing Transition Plan to be submitted by 31 December 2018. RRTPs are required to demonstrate how Councils will transform their use of temporary accommodation with the aim of ending the use of temporary accommodation. Scottish Government guidance suggests that this will require a 45% increase in the number of allocations of social housing to homeless households.
Moray's RRTP aims to increase the allocations quota to Homeless List applicants from 40% to 50% and will increase the number of Section 5 referrals made to Housing Associations. The RRTP estimates that this will achieve a more modest increase in the number of allocations to homeless households, i.e. a 17% increase by 2020/21.
Past experience leads the Council to believe that to increase the quota of allocations to Homeless List applicants beyond this level could create a perception in the general public that this is the quickest and most effective route to a social housing tenancy, as so would be counter-productive. However, the Council will keep this approach under annual review as part of its wider target setting process.

Keeping in mind the proportionality of any action proposed to mitigate the impact, describe the scale and likelihood of these risks.
The more modest target setting described above could risk slower progress on Scottish Government strategic aims, but Moray Council believes the approach set out in the RRTP strikes an appropriate balance between the housing needs of homeless households and the housing needs of other households prevalent on the Council's Housing List and covered by the Equalities Act 2010, namely disabled people, old people and children (especially those living in overcrowded households).

If nothing can be done to reduce the negative impact(s) but the proposed policy/activity must go ahead, what justification is there to continue with the change?

SECTION 3 CONCLUDING THE EIA

Concluding the EIA *(see note 12)*

Summarise your findings and give an overview of whether the policy will meet the council's responsibilities in relation to equality and human rights referring to the four possible outcomes. Adjustments to Scottish Government guidance on rapid rehousing has been applied, to better fit local issues with the aim of striking an appropriate balance between needs groups and to better promote equality. Measures already in place via the LHS/SHIP and the Council's revised Allocations Policy will help to mitigate any impact on disabled/older households and overcrowded children resulting from an increased quota of allocations to Homeless List applicants
Decision Set out the rationale for deciding whether or not to proceed with the proposal(s) The moderate increase in housing allocation to Homeless list applicants is a result of balancing the needs of various vulnerable groups (Homeless, Disabled, Elderly, Children). **Date of Decision:** 25 April 2019

Sign off and authorisation:

Service	Housing and Property
Department	Environmental Services
Policy/activity subject to EIA	Rapid Rehousing Transition Plan
We have completed the equality impact assessment for this policy/activity.	Name: Fiona Geddes Position: Acting Housing Strategy and Development Manager Date: 25 April 2019
Authorisation by head of service or director.	Name: Graeme Davidson Position: Acting Head of Housing and Property Date: 25 April 2019
Please return this form to the Equal Opportunities Officer, Chief Executive's Office.	