



Rapid Rehousing Transition Plan

2019/20 to 2023/24

Year 1 – 2019/20

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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.

And 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 if mainstream housing, including Housing First, is not possible or preferable.

This plan sets out Moray Council's **initial** approach to that 5 year transition.

2. Links to other Strategies and Plans

This Plan is one of the suite of strategic documents which make up the Local Housing Strategy, and will be reviewed annually as part of the Strategic Housing Investment Plan (SHIP) process. This 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".

Moray has proportionally **fewer social rented** properties (19%) and a smaller private rented sector (11%) than the Scottish average.

At 31 March 2018 there were 3,067 households registered on the Council's housing list, and on average there were 8 applicants for every vacancy, and this ratio varies widely across house sizes. The greatest pressure is on 4 bedroom properties (159:1) and on 1 bed general needs (19:1). There is considerably less pressure on 2 bed general needs properties (5:1).

At any given time, Moray Council has approximately 100-120 statutorily homeless households waiting to be permanently rehoused.

Moray 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.

4. Homelessness context

Moray performs very well in achieving decisions on homeless presentations within 28 days, i.e. the benchmark set by the Code of Guidance on Homelessness 2005.

Table 3:	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 HI1

The HNDA 2017 provides analysis of homeless presentations over 2012/13 to 2016/17 and 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%), followed by a “non-violent dispute within the household” (12%)
- The vast majority of households presenting as homeless have a local connection to Moray. The local connection is mainly associated with residency and family association.
- Approximately 60% of presentations were found to be statutorily “homeless/potentially homeless unintentional”.
- Repeat homelessness is generally lower than the Scottish average.
- Very few rough sleepers (see Table 2 below)

HNDA data has been updated to include 2017/18 and presented in Table 1 below. This shows that **these trends have remained relatively stable over the last 5 years.**

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.**

The HNDA 2017 found that “pressure on supply of temporary accommodation could be alleviated by increasing turnover”.

Table 1: Reason for Homeless application 2013 to 2018

Reason	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

The table below shows the shows the number and proportion of rough sleepers over the last 5 years.

Table 2: Homeless Decision	2013/14		2014/15		2015/16		2016/17		2017/18	
a. Homeless/ Potentially Homeless Priority	293		294		292		293		274	
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

Scottish Government data (HL1) shows that prevalence of rough sleeping in Moray is similar to comparator authorities e.g. Highland and Argyle and Bute authorities and considerably less than Glasgow City Council. Homeless applicants self-certify their rough sleeping status. Officers do not observe rough sleepers on Moray's streets in a manner similar to rough sleepers visible on the streets of Scotland's large cities i.e. Glasgow, Edinburgh, Dundee, Aberdeen.

Housing Options/ Homelessness Prevention

In October 2010, the Council introduced a Housing Options team with the aim of preventing homelessness where it was possible to do so. For those who do become homeless, the Council aims to offer good quality temporary accommodation where necessary, and assistance to find a suitable permanent home.

The Housing Options team can demonstrate success in that, consistently, approximately half of households using the service choose not to make a Homeless Application to the Council, and are assisted to find a housing solution short of presenting as homeless. Housing Options outcomes are presented in the table below:

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.

5. 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.

The table below 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.

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)	£306.40	£70.71	£59.04	19.8%	£11.67
1 bedroom	£470.00	£108.46	£91.81	18.1%	£16.65
2 bedrooms	£550.00	£126.92	£110.72	14.6%	£16.20
3 bedrooms	£650.00	£150.00	£126.92	18.2%	£23.08
4 bedrooms	£812.50	£187.50	£160.38	16.9%	£27.12

Source: HNDA 2017 Table 2.17

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
- lower quartile income households could afford rents of not more than £65.53 per week/ £283.96 per calendar month.
- the reducing 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.**

Moray Council Charging Policy for Temporary Accommodation

This 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:

- to use a cost effective and fair rent setting process,
- to ensure temporary accommodation is an affordable option to all; and
- to use recovery practices which take into account a household's income whilst, ensuring that those with the means to pay do 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".

The rent level charged by property size will be as follows:

Property size	2018/19 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	£104.04 per week	£44.97 per week
1 bedroom	£136.81 per week	£60.47 per week
2 bedroom	£155.72 per week	£71.06 per week
3 bedroom	£171.92 per week	£82.05 per week
4 bedroom	£205.38 per week	£101.21 per week

The Council reviews rents annually as part of the budget process. Annual increases in rents will be influenced by the property size, occupancy rates by household type and the capping levels imposed through Local Housing Allowance and welfare reform.

6. 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 2018-2023 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 2018 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 6: Projected completions of Affordable Housing	2019/20	2020/21	2021/22	2022/23	2023/24	Total
No of Completions	69	462	228	281	69	1,109

Source: Draft Moray SHIP 2018

At present Moray Council is the biggest participant in the SHIP delivery programme through its own prudential borrowing. The Council’s Business Plan currently makes provision for 70 units of new build housing per year until 2020/21.

It is unlikely that the number of affordable units delivered through the SHIP will match that required by HNDA 2017, due to limited investment funding.

7. Health and Homelessness

This project was commissioned by the Scottish Government and builds upon analysis undertaken in the USA and by Fife Council and NHS Fife in 2015. This study links homelessness and health datasets for the first time at a national level, to explore 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 project published its final report on 19 June 2018. The key findings 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:
 - 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%).
 - 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%).
 - 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.
 - In particular, 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.

8. Baseline Position of temporary accommodation supply

As at 31 March 2017, Moray Council was using 165 units of temporary accommodation, with an average length of stay of 133 days.

Temporary accommodation in Moray is usually delivered via the reconfiguration of existing housing stock, rather than via specialist new build. Current provision includes self-contained, dispersed temporary accommodation; supported temporary accommodation units across the local authority area, and is mainly drawn from existing social rented stock (67%), rather than specialist supported housing facilities.

In September 2016, Moray Council's Communities Committee agreed that the Head of Housing and Property, in consultation with service managers, should determine the number of temporary accommodation units required to meet its statutory homelessness duties rather than set an annual target for this purpose. 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 use of bed and breakfast.

Temporary Accommodation described

Cameron Parkbrae, Elgin

This is a local authority owned, purpose built, hostel which was opened in July 1996. This is funded by the General Services account. It has 10 units of self-contained temporary 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 the Council's out of hours telephone answering service is currently based at this location.

Quarryhill, Keith

This is the oldest hostel which is used by the Council as temporary furnished accommodation. It is also funded by the General Services account. It has 6 bedsits and a caretaker flat within and has shared cooking and bath/shower/toilet facilities. Quarryhill is registered as a House in Multiple Occupation (HMO) and would currently fail the Council's own standards for the provision of temporary accommodation, due to the shared facilities which operate at this location, (bathrooms, toilets, kitchens, etc.). 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 currently funded from the General Services Account and has 8 x 1 bedrooms, 5 x 2 bedrooms and 1 office.

Dispersed houses

As at 5 November 2018 there were 97 units of dispersed furnished housing located across Moray which is used for temporary accommodation.

Supported Accommodation described

The Council has 30 units of supported accommodation which are all managed through 3 external housing support contracts. Two of these 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 provides 10 units of shared accommodation for service users with alcohol/substance dependency. The property is leased from Langstane Housing Association. The service is currently funded by the General Services Account on a 3 year contract which is due to expire on 30 June 2019.

Covesea Road, Elgin 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 by the General Services Account on a 3 year contract which is due to expire on 30 June 2019.

Marleon House, Elgin 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 and leased to Moray Women's Aid (MWA). The building has 7 self-contained units (2 x bedsit, 3 x 2 bedrooms and 2 x 3 bedrooms). MWA also lease 3 dispersed properties in the community from the Council (2no. 1 bed and 1no. 2 bed). The service is currently funded by the General Services Account on a 3 year contract which is due to expire on 31 March 2020.

The Royal Hotel, Forres - The Council has an external contract in place 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 would fail the Council's own standards for temporary accommodation due to shared facilities. The service is funded by the General Service Account on a 3 year rolling programme, commencing in 2010 and which is due to end on 31 March 2019.

These properties used as temporary accommodation, along with occupancy details for 2017/18 are illustrated in the table below.

Table 8: Overarching type of provision	List of each individual building used at 31 March 2017	Location	No. of households living in the TA at 31 March 2017	Total households who have entered accommodation between 1 April 2017 and 31 March 2018	Total households who have left accommodation between 1 April 2017 and 31 March 2018	Estimated occupancy in the year
Emergency	5.6 Bed and breakfast	-	7	31	39	38
Interim - provided under the Homeless Persons (Provision of Non-permanent Accommodation) (Scotland) Regulations 2010 – accommodation provided that meets the need of section 4 of that SSI and before the LA has discharged its duty into settled accommodation.	5.1 LA ordinary dwelling	dispersed properties + Cameron Parkbrae	76	179	272	255
	5.2 Housing association / RSL dwelling	dispersed properties	21	54	81	75
	5.3 Hostel - local authority owned	Quarryhill, Keith	6	13	16	19
	5.4 Hostel - RSL	Gildry House/ Covesea Road	20	7	60	27
	5.5 Hostel - other	Royal Hotel, Forres	25	63	101	88
	5.7 Women's refuge	Marleon House + dispersed properties	10	20	38	30
	5.8 Private sector lease	Royal Hotel, Forres	0	35	46	35
Interim Total			158	371	614	529
Temporary furnished flats - Self-contained flats based in the community used as temporary homeless accommodation.			0	0	0	0
Other	5.9 Other placed by authority		0	0	0	0
Grand Total			165	402	653	567

Source: Moray Council records

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.

9. Moray's Rapid Rehousing Transition Plan

Our vision for the next 5 years is to continue to provide a good quality Housing Options service and to prevent homelessness as much as possible. Where this is not possible we will aim to move to a position where homeless households move through Council services as quickly as possible; where time spent in temporary accommodation is kept to a bare minimum, reshape the housing stock we use as temporary accommodation aiming to provide a range of options, of good quality, of a size/type and in a location which match demand and minimise disruption to the daily lives of those experiencing homelessness.

The actions detailed below describe what we will do over the **first year** of this longer term transition period. We will review these actions and associated targets annually throughout the transition period.

Action 1: Maintain a Housing Options approach to homelessness prevention

Our commitment to Housing Options will be continued into the forthcoming draft LHS 2018-2023 which states the focus for housing options will be to:

- Identify households with current or potential housing need and help them to plan to meet that need at an early stage;
- Identify a range of options for households in housing need including all tenures;
- Ensure appropriate housing support services are available to all who need it to prevent homelessness, and to break the cycle of repeat homelessness. The effect of this approach should ensure that fewer people require assessment under homeless legislation which in turn will reduce the numbers requiring temporary, and then permanent, accommodation. When achieved, the result will be improved sustainable housing outcomes through people moving house in a planned way, rather than in crisis

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.

In addition to current Housing Options practice detailed above, for households threatened with eviction, Moray Council will investigate the potential use of Short Scottish Secure Tenancies (aka technical eviction) with appropriate housing support as an alternative to actual eviction and placement in temporary accommodation. This has potential to minimise costs and reduce the trauma of homelessness experienced by the household, especially any children involved.

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. With this in mind, during 2019/20, the Housing Service will consider the need to enhance the **specialist mediation** services it is able to offer.

Action 2: Increase the number of social housing relets available to homeless households

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.

Moray Council allocates its own vacancies using 3 separate lists, Transfer, Waiting and Homeless lists with a quota applicable to each list. These quotas aim to strike an appropriate balance between all needs groups and are reassessed annually. The Waiting and Transfer list applications are prioritised using a points-based system, and Homeless List applicants are rehoused chronologically. To address the shortfall in lets to homeless households suggested by the toolkit, would represents an increase in allocations to homeless households of almost 50%, and would require Council Allocations Policy quotas to increase from 40% to 70% of general needs lets to 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 this Plan, sheltered/ extra care housing allocations have been separated, in an effort to accurately represent availability to homeless households.

As most local RSLs operate a Choice Based Lettings model of allocations, this would also require a significant increase in the number of Section 5 referrals to achieve this level of increase in allocations to homeless households.

Moray Council believe that 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, and that this perverse incentive would be contrary to the aims of HARSAG and the Scottish Government. This effect was evident in the period leading up to the removal of the priority need test in December 2012.

The Council will aim to increase the number of general needs social housing allocations to homeless applicants by 10%, from 273 general needs social rented allocations in 2017/18 to approximately 302 in 2019/20.

This will be achieved through a combination of the actions set out below:

- The Council sets its quote of allocations to Homeless List applicant annually. This quota has been 40% (+/-5%) since 2012/13. The Council will **increase this quota to 45% (+/-5%) in 2019/20**, in an effort meet the aims of this Plan. 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.

- Renegotiate local RSL nomination agreements and **increase use of Section 5 referrals** with the aim of RSL allocations to homeless households continuing to at least match the Council's quota.
- Moray Council's Allocations Policy is currently under review, and proposed changes are currently out to public consultation. In part, this has been driven by implementation of the Housing (Scotland) Act 2014, but also by the findings of the HNDA 2017. One of the proposed changes to Moray Council Allocations Policy aims to facilitate transfers for under-occupying social renters which will increase social housing relet rates and in turn will increase availability of permanent housing options generally. If approved, we estimate these changes, implemented from May 2019, will provide an **additional 40-50 relets in 2019/20**.
- Moray's LHS 2018 – 2023, currently in draft form, will include a review of Moray Council's **New Build Lettings Plan** during 2019/20 in its Action Plan, with a view to increasing the proportion of new lets to homeless households. A public consultation on the draft LHS will commence early in 2019.

Action 3: Increase supply of social housing relets, especially 1 bed units

LHS Housing Supply Target and Strategic Housing Investment Plan (SHIP)

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 2018–2023 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 will commence in early 2019.

Sheltered Housing Review

Moray Council owns 149 units of sheltered housing. The built form of this stock varies considerably; from a 30+unit complex with communal spaces; to blocks of 1 bed flats; to clusters of individual bungalows in semi-rural areas. Some of this sheltered stock has been defined as low demand for many years, mainly due to issues of design and/or rural location.

There may be potential to reconsider the best use of this stock. The forthcoming draft LHS 2018-23 will include a Sheltered Housing Review as an action to be completed during 2019/20. This Review could consider some of the low demand

sheltered housing for de-registration with the Care Commission, on a sensitive and possibly incremental basis. This stock could be reused to increase supply of permanent and temporary housing options.

Action 4: Improve the value for money of temporary accommodation

The Council continually reconfigures the properties used as temporary accommodation. The Council are aware of high levels of refusals of offers of some of our temporary accommodation, and also issues of lesser quality accommodation. The Council will seek to improve the quality of temporary accommodation offered to homeless households.

Over the term of this plan the Council will aim to:

- Reduce use of B&B
- Reduce use of private sector leasing and hostel accommodation
- Reduce use of specialist supported housing
- Reduce use of RSL properties leased for use as temporary accommodation
- Increase the number of Moray Council HRA properties used as temporary accommodation in appropriate locations (additional 38 units)

Action 5: Develop and Implement a Housing First model in Moray

Housing First 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. Officers believe there are approximately **10 households in Moray** who live chaotic lifestyles, experience repeat homelessness and are high consumers of NHS services.

The Heriot-Watt University study “Developing a profile of Severe and Multiple Disadvantage in Scotland” suggests that there are 74 households experiencing severe and multiple disadvantage in Moray, and so any **Housing First model should include contingency to expand** provision to accommodate this number of service users.

Officers already have experience of providing housing options with associated support services to these households and can use this experience as the basis to develop an effective Housing First model for Moray.

This Housing First model **will be in place by March 2020** and will require a multi-agency commitment to be successful. Key development actions will include:

- Engagement with Health and Social Care Moray and NHS Grampian. Links to this Plan are expected in the Strategic Commissioning Plan Housing Contribution Statement
- Implementation of SHORE standards
- Implementation of Moray Hospital Discharge Protocol currently under review.

As stated above, we believe the most effective housing option for our Housing First model will be Moray Council properties. Moray Council's current Voids Policy requires that outgoing tenants clear properties of all goods including floor coverings. As a consequence, it is likely that many of the Housing First service users will require help to provide themselves with furniture and household goods. Moray Council currently provides grant funding to Moray Fresh Start, for provision of a household goods service for statutorily homeless households. Moray Fresh Start do not provide furniture. The implementation of Moray Housing First would inevitably result in an increase of referrals to Moray Fresh Start, and would require development of a furniture provision service in some form.

The Housing First service will have access to predominantly smaller, self-contained general needs housing units in the social sector. However it will also have to have access to good quality **specialist supported housing** to ensure provision is available for those who do not want their own tenancy.

Action 6: Quantify support needs

In principle, **housing should be provided without the need for tenants to prove themselves "tenancy ready"**, with housing support and specialist care services provided to the tenant in-situ if necessary, and for as long as necessary to sustain the tenancy.

The transition to rapid rehousing will require a culture change which eradicates the concept of service users being assessed as "tenancy ready".

In this first year of transition, the impact of rapid rehousing on the size and nature of support services has not yet been quantified, but this will develop in subsequent years.

However, using the evidence base of the Health and Homelessness Linkage Project, Moray Council has assumed that approximately 50% of statutorily homeless households have no or low housing support needs.

It is likely that housing support packages provided to Housing First service users would require to be at a more intense level than currently provided and would be required 7 days a week. Therefore it is highly likely that the current number of Housing Support workers would have to increase to provide sufficient coverage. This will be quantified as part of the development of Moray's Housing First model

during 2019/20, and will require the participation of Health and Social Care Moray and the NHS.

Reassurances would also be required that Housing First service users would have continuing access to specialist (drug, alcohol and mental health) support/ rehabilitation/ health services for as long as necessary for them to maintain their tenancy. If the concept of “tenancy ready” is to be eradicated, then access criteria to these specialist support services should also be reviewed.

Action 7: Reduce length of stay in temporary accommodation

Prioritise rapid rehousing for families with children in Year 1

It is well documented that there is significant damage done to the life chances of people who have experienced homelessness or insecure housing in childhood.

Traditionally we have low numbers of households with children occupying our temporary accommodation. Where we are required to house households with children we have always sought to minimise the length of stay in unsuitable accommodation and keep the number of transitions to a minimum. Most families with children in Moray’s temporary accommodation occupy self-contained, furnished accommodation, in a location which minimises disruption to the children’s education wherever possible.

We have agreed that, in the initial phase of this transition plan, families with children will be prioritised for rapid allocation of a permanent housing option, in an effort to minimise any trauma on those children arising from their insecure housing situation. This will be entirely dependent on the success of Actions 1 and 2 on increasing availability of social housing of the right size and type, and in the right location, to meet the needs of this group.

As the 5 year Transition Plan progresses, and as availability of permanent housing options increases, this prioritisation will be **kept under review** aiming to include additional household groups.

10. Rapid Rehousing Resource Plan

The success of this plan will be dependent on adequate resources, both budgetary and staffing, to complete tasks relevant to this Plan, to be included in the forthcoming LHS Action Plan.

These are:

- Development of revised RSL Nomination Agreements
- Increased use of Section 5 referrals
- Increased relet rates in Council stock and associated implications for Allocations Teams and Void budget
- Continued investment in the Council's new build programme.
- Sheltered Housing review
- Development of Housing First model by March 2020, and associated partnership and collaboration with Health and Social Care Moray and NHS Grampian on both children's' and adult service provision.

As this is a first iteration of Moray Council Rapid Rehousing Transition Plan the costings of the Plan have not been included. A fully costed Plan will be in place prior to implementation beginning on 1 April 2019.

However in general terms, in its first year, Moray Council will aim to make **cost-neutral** changes to its Homelessness services. This will include:

- Reduced expenditure on B&B
- Reduced expenditure on hostel accommodation
- Reduced expenditure on private sector leased temporary accommodation
- Increased expenditure on Moray Council owned dispersed temporary accommodation.
- Increased expenditure on Housing Support staff, associated with implementation of a Housing First model
- Increased support to Moray Fresh Start, in support of a Housing First model.

Progress and targets will be reassessed in 2019/20 along with SHIP 2019.

Action	Responsibility	Timescale	Status
1: Maintain a Housing Options approach to homelessness prevention			
Ensure appropriate housing support services are available to all who need it to prevent homelessness	Moray Council	ongoing	
Participate in the H&I Housing Options HUB	Moray Council/ RSLs	ongoing	
Investigate the potential use of Short Scottish Secure Tenancies (aka technical eviction) with appropriate housing support as an alternative to actual eviction and placement in temporary accommodation.	Moray Council/ RSLs	May 2019	
Consider provision of enhanced specialist mediation services	Moray Council	March 2020	
2: Increase the number of social housing relets available to homeless households			
Increase Moray Council Allocations Policy quota to Homeless List	Moray Council	April 2019	
Renegotiate local RSL Nomination Agreements	Moray Council/ RSLs	March 2020	
Consider the need to increase the use of Section 5 referrals to RSLs	Moray Council/ RSLs	ongoing	
Review Moray Council New Build Lettings Initiative	Moray Council	March 2020	
3: Increase supply of social housing relets, especially 1 bed units			
Maintain current emphasis on delivery of 1 bed general needs flats for social rent through SHIP	Moray Council/ RSLs	ongoing	
Complete Sheltered Housing review	Moray Council	March 2020	
4: Improve the value for money of temporary accommodation			
Minimise use of B&B	Moray Council	ongoing	
Reduce use of private sector leasing and hostel accommodation	Moray Council/ RSLs	March 2020	
Reduce use of specialist supported housing	Moray Council/ RSLs	March 2020	
Reduce use of RSL properties leased for use as temporary accommodation	Moray Council/ RSLs	March 2020	
Increase the number of Moray Council HRA properties used as temporary accommodation in appropriate locations	Moray Council	March 2019	

Action	Responsibility	Timescale	Status
5: Develop and Implement a Housing First model in Moray			
Establish a Housing First multi agency development group	Moray Council/ RSLs/ Health and Social Care Moray/ NHS Grampian	March 2019	
Implement SHORE standards	Moray Council/ RSLs/ Scottish Prison Service	ongoing	
Review furniture and household goods services	Moray Council/ RSLs	March 2020	
6: Quantify support needs			
Quantify the impact of Housing First on Housing Support services	Moray Council/ RSLs	March 2020	
Review access criteria applicable to specialist support/ rehabilitation/ health services	Health and Social Care Moray/ NHS Grampian	March 2020	
7: Reduce length of stay in temporary accommodation			
Monitor length of stay in temporary accommodation of households with children	Moray Council	ongoing	
Maintain current emphasis on delivery of 3+ bed general needs housing for social rent through SHIP	Moray Council/ RSLs	ongoing	

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 council staff, partner or others i.e contractor, partner or community)	Gordon McCluskey

Brief description of policy/activity

<p>Describe the policy/activity <i>(see note 2)</i>:</p> <p>Rapid Rehousing Transition Plan required by Scottish Government, which 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 suite of documents which make up the Local Housing Strategy.</p>
<p>Who are your main stakeholders? <i>(see note 3)</i></p> <p>Statutorily homeless households</p>

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 believe 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	

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 45% +/-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 45% +/-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		

**Rapid Rehousing Transition Plan
Equality Impact Assessment**

APPENDIX 2

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		

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/No

Please explain

The RRTP sets the Allocations Policy quota for Homeless List applicants at 45% (+/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/No

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.

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.

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 45% and will increase the number of Section 5 referrals made to Housing Associations. The RRTP estimates that this will achieve a more modest increase the number of allocations to homeless households, i.e. a 10% increase in 2019/20.

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.

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: 7 December 2018

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: Senior Housing Officer (Strategy) Date: 30 November 2018
Authorisation by head of service or director.	Name: Richard Anderson Position: Head of Housing and Property Date: 7 December 2018
Please return this form to the Equal Opportunities Officer, Chief Executive's Office.	