

Moray Local Housing Strategy 2019-24 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, Senior Housing Officer (Strategy)
Other people involved in the screening (this may council staff, partner or others i.e contractor, partner or community)	Graeme Davidson, Housing Strategy and Development Manager

Brief description of policy/activity

Describe the policy/activity (see note 2):

The Housing (Scotland) Act 2001 requires all Local Authorities to publish a Local Housing Strategy. The Local Housing Strategy (LHS) is a planning tool which sets out the actions the Council and its partners will take to seek to achieve the LHS's aim. The LHS's aim, as stated in the Consultative Draft LHS 2013 – 2018 is:

To ensure that sufficient good quality, affordable housing¹ is available to meet the needs of people living in or requiring housing in Moray.

The LHS is developed in conjunction with the Local Development Plan. Both strategic documents have extensive public and stakeholder consultation as an intrinsic part of their development. The LHS uses the Housing Need and Demand Assessment (HNDA) as a key evidence base, the development of which also includes extensive stakeholder consultation.

The Scottish Government has published LHS Guidance to help Councils develop their LHS. The Guidance requires equality issues to be mainstreamed throughout the LHS.

¹ Affordable housing is housing made available at a cost below full market value, to meet an identified need. The term intermediate affordable housing is used to cover all types of affordable housing which are not social rented, e.g. shared ownership, shared equity, mid-market rent.

Moray Local Housing Strategy 2019-24 Equality Impact Assessment

Who are your main stakeholders? *(see note 3)*

Moray households in housing need and homeless
Moray Council tenants and Housing Association tenants in housing need
Older and disabled people in housing need
Households experiencing fuel poverty
Households living in poor housing conditions.

Evidence base for assessment *(see note 4)*

Housing Need and Demand Assessment 2017
Housing Needs of Gypsy Travellers joint research 2018.
Health and Homelessness 2018

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	HNDA 2017
Disability	HNDA 2017
Carers (for elderly, disabled or minors)	HNDA 2017
Gender or gender identify/gender reassignment	
Pregnancy and maternity (including breastfeeding)	
Sexual orientation	
Age (include children, young people, midlife and older people)	HNDA 2017
Religion, faith and belief	

**Moray Local Housing Strategy 2019-24
Equality Impact Assessment**

Marriage or civil partnership	
Human rights	
Socio-economic disadvantage (low income, deprived area, rural or remote area)	HNDA 2017
Inequalities of outcome (poorer outcomes for certain people or communities)	Scottish House Condition Survey (Fuel poverty)
Staff	
Partners/contractors	
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?

No

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.

**Moray Local Housing Strategy 2019-24
Equality Impact Assessment**

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	Y (gypsy/travellers)	
Disability	Y	Y
Carers (for elderly, disabled or minors)	Y	Y
Gender or gender identify/gender reassignment		
Pregnancy and maternity (including breastfeeding)		
Sexual orientation		
Age (include children, young people, midlife and older people)	Y older people Y Children in overcrowded households Y Care-experienced young people	
Religion, faith and belief		
Marriage or civil partnership		
Human rights		
Socio- economic disadvantage (low income, deprived area, rural or remote area)	Y	
Inequalities of outcome (poorer outcomes for certain people or communities)	Y Fuel poor households Y persons with a learning disability	
Whole population (universal service)		
Staff		
Partners/contractors		
Other		

**Moray Local Housing Strategy 2019-24
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 – see Action Plan

Does it create negative disadvantage or inequalities?

Potential impact on older people and disabled people if budgets for disabled adaptations are not maintained.

If you have indicated there is a negative impact on any group, is that impact (see note 8):

Legal?

No

Intended?

No

Mitigating action (see note 10)

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

Yes – Partially – see Action Plan

Justification (see note 11)

LHS actions aim to reduce inequality in Moray's housing system and therefore implementation is justified.

**Moray Local Housing Strategy 2019-24
Equality Impact Assessment**

SECTION 3 CONCLUDING THE EIA

Concluding the EIA *(see note 12)*

Implementation of LHS 2019-24 will partially remove barriers identified by the EIA Action below, within funding constraints, and will meet council's responsibilities in relation to equality and human rights referring.

Therefore Outcome 2 is most appropriate "Adjustments to remove barriers identified by the EIA or to better promote equality."

Decision

The LHS 2019-24 aims to reduce inequality in Moray's housing system and therefore implementation is justified and recommended.

Date of Decision: 10 January 2019

Sign off and authorisation:

Service	Housing and Property
Department	Environmental Services
Policy/activity subject to EIA	Local Housing Strategy 2019-24
We have completed the equality impact assessment for this policy/activity.	Name: Fiona Geddes Position: Senior Housing Officer (Strategy) Date: 10 January 2019
Authorisation by head of service or director.	Name: Richard Anderson Position: Head of Housing and Property Date: 11 January 2019

**Moray Local Housing Strategy 2019-24
Equality Impact Assessment**

Evidence gaps *(see note 13)*

Evidence fully assessed via HNDA 2017, Rapid Rehousing Transition Plan and LHS 2019-24.

Engagement and consultation *(see note 14)*

Stakeholders have been consulted through LHS development, and governance is provided by the Housing Strategy Group.

Procurement and partnerships *(see note 15)*

N/A

Additional research

None

**Moray Local Housing Strategy 2019-24
Equality Impact Assessment**

Action plan (see note 16)

Action/Measure	Describe how this action/measure will reduce impact.	State whether this action/measure will completely or partially reduce impact.	Describe how you will know whether this action/measure has had the desired effect i.e. how will you be able to demonstrate that the negative impact(s) has been reduced?	When will the impact of this action/measure be reviewed?	Who will be responsible for this action/measure?
Overall impacts	<p>The overall aim of the LHS is to ensure that sufficient good quality, affordable housing is available to meet the needs of people living in or requiring housing in Moray.</p> <p>The LHS aims to reduce inequality overall, but health inequality in particular</p>	partially	LHS Performance Framework	HNDA 2022/23	Housing Strategy Group
Positive impacts					
Acute shortage of affordable housing and increasing use of temporary accommodation	The LHS actions relating to increase the supply of affordable housing, of the right size and type and in the right locations to match demand will mitigate the disadvantage in the housing market experienced by Housing List applicants and homeless households	partially	LHS Performance Framework	LHS annual review	All Moray social landlords

**Moray Local Housing Strategy 2019-24
Equality Impact Assessment**

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<p>People experience homelessness and increasing time spent in temporary accommodation</p>	<p>LHS Priorities 1 and 2 will reduce the socio-economic disadvantage experienced by homeless households by seeking to increase the supply of affordable housing, of the right size and type and in the right locations to match demand arising from statutorily homeless households. The Rapid Rehousing Transition Plan requires implementation of a Housing First model which will further reduce disadvantage.</p>	<p>partially</p>	<p>LHS Performance Framework</p>	<p>LHS annual review</p>	<p>Housing Strategy Group</p>
<p>People with physical and sensory disabilities are disadvantaged in the housing market due to lack of supply of suitably designed housing in all tenures and in all areas.</p>	<p>Measures detailed in the LHS housing supply target and the LDP Accessible Housing Policy will mitigate the disadvantage experienced by disabled people in housing need. This is complemented by the Council's Allocations Policy.</p>	<p>partially</p>	<p>LHS Performance Framework</p>	<p>LHS annual review</p>	<p>Housing Strategy Group</p>

**Moray Local Housing Strategy 2019-24
Equality Impact Assessment**

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<p>People with learning disabilities are amongst those who experience the most overall disadvantage in society. The LHS has identified a lack of appropriate housing for this group of people.</p>	<p>This disadvantage will be mitigated by the LHS commitment to award high priority for Scottish Government funding to housing developments which facilitate the aims of the ongoing Accommodation Review led by Health and Social Care Moray.</p>	<p>partially</p>	<p>LHS Performance Framework</p>	<p>LHS annual review</p>	<p>All Moray social landlords/ Health and Social Care Moray</p>
<p>The housing needs of Gypsies/ travellers has been assessed via the HNDA 2017 and a shortfall in supply has been quantified.</p>	<p>The Council does not currently provide any sites for gypsies/travellers. The LDP 2020 Delivery Plan includes an action to identified a suitable site(s).</p>	<p>partially</p>	<p>LDP 2020 Delivery Plan</p>	<p>HNDA 2022/23</p>	<p>Moray Council Planning</p>
<p>Many older and vulnerable owner-occupiers experience difficulty in maintaining their properties in good physical condition, and are at risk of disadvantage and health inequality as a result.</p>	<p>LHS actions under Scheme of Assistance (SoFA) and Care & Repair services will aim to mitigate this disadvantage in a targeted manner.</p>	<p>partially</p>	<p>LHS Performance Framework</p>	<p>HNDA 2022/23</p>	<p>Housing Strategy Group</p>

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Equality Impact Assessment**

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Many lower income households experience difficulty in paying for adequate heating in their homes.	LHS actions relating to home insulation schemes and energy advice services aim to mitigate this disadvantage in a targeted manner.	partially	LHS Performance Framework	HNDA 2022/23	Housing Strategy Group
Negative impacts					
Potential negative impact on older people and disabled people if budgets for disabled adaptations are not maintained.	This negative impact can be mitigated if budgets are maintained	partially	LHS Performance Framework	HNDA 2022/23	Housing Strategy Group