

Section 1: EQUALITY IMPACT ASSESSMENT (EIA)

Name of policy/activity: Rapid Rehousing Transition Plan (RRTP)
This is a: <ul style="list-style-type: none">• New policy/activity• Existing policy/activity?• Budget proposal/change for this policy/activity?• Pilot programme or project?

Decision <p>The RRTP was written in 2019 and included an EIA. The RRTP did not progress as quickly as was anticipated (in part due to the pandemic) but it has now been updated to reflect the changes moving forward. It aims to reduce the overall numbers of homeless applications whilst making the journey faster and less stressful for those who are homeless or potentially homeless. The RRTP also encompasses the Housing First process which concerns the allocation of tenancies to applicants who may not otherwise have been offered one due to their chaotic lifestyle. This could have an impact on applicants, neighbouring tenants and potentially adverse publicity for the Council. The RRTP does not adversely affect any particular protected characteristic but does have possible consequences for anyone applying for social housing. The requirement for a EIA was therefore identified.</p> <p>Protected characteristics are listed at 5 (below) and anyone who is not homeless, but identifies with one or more of the protected characteristics, will not be negatively affected because of those characteristics. Section 8 (below) confirms that we are working hard with local Registered Social Landlords to increase the allocations via updated nominations agreements to offer tenancies to those who could otherwise believe to be adversely affected.</p> <p>Date of Decision: November 2021</p>
--

Assessment undertaken by:

Director or Head of Service	
Lead Officer for developing the policy/activity	

Other people involved in the screening (this may be council staff, partners or others i.e contractor or community)	
--	--

SECTION 2: EQUALITY IMPACT ASSESSMENT

Brief description of the affected service

1. Describe what the service does:

- a) The Rapid Rehousing Transition Plan (RRTP) is managed by the Housing and Property Services Department. The Scottish Government requires all local authorities to produce and implement a RRTP.
- b) The RRTP primarily aims to eliminate homelessness. However, when homeless presentations are identified, the RRTP will improve the experience of homelessness applicants by reducing the homelessness journey whilst aiming to avoid the need for temporary accommodation. When temporary accommodation is required it needs to be to a higher standard suitable to the applicant's needs. Any time spent in temporary accommodation should be kept to a minimum with no, or as few, transitions as possible.
- c) The RRTP also provides a platform to launch 'Housing First'. This is a programme which provides suitable, preferably mainstream, housing for applicants with complex needs who may require significant levels of support in order to sustain their tenancy. Once suitable housing has been identified, what can be, high level support is provided to the tenant, although it is not conditional to being offered a tenancy. This aims to eradicate rough sleeping and homelessness for challenging applicants by ensuring everyone has suitable and sustainable accommodation in their area of choice.

The above will contribute to the Government's longer term aim of ending homelessness.

2. Who are your main stakeholders?

- Housing Applicants
- Moray Council housing team
- Local Registered Social Landlords (RSL's)
- Moray Integrated Joint Board (MIJB)
- Children and Families Social Work Services
- Community Safety Team
- Criminal Justice/Youth Justice
- Arrows (Drug and Alcohol Service)

3. What changes as a result of the proposals? Is the service reduced or removed?

The homelessness service becomes more efficient by transitioning applicants through the system quicker. This can mean avoiding the need to use temporary accommodation or, if temporary accommodation is required, means a reduced number of days in temporary accommodation. This, in turn, required a lesser number of properties retained for homeless applicants. This will enable cost savings for applicants as they won't remain in relatively costly accommodation longer than is necessary. Moray Council will save on costs by reducing the number of properties for which it pays void costs. Applicants who lead chaotic lifestyles will receive housing and support to enable them to return to mainstream society.

4. How will this affect your customers?

For those who cannot avoid homelessness, it means a more efficient transition through the homeless system which will lead applicants to a settled lifestyle sooner than in previous years. There will also be applicants who will receive tenancies who may not have otherwise been considered for a tenancy due to their lifestyle and lack of ability to sustain a tenancy. This will affect applicants who are not classified as homeless and potentially result in a few housing applicants not being housed who previously, may otherwise have received a tenancy. However, we are working hard with Registered Social Landlords to address this. There is also potential for an increase in the volume of complaints of antisocial behaviour as tenants settle into a new way of life. This could impact neighbourhoods unless the proper support is provided.

Although difficult to quantify at this time, we intend to monitor what this means for applicants and tenants in the coming years to ensure no one is disproportionately affected. Where any issues are identified, we will positively address these by assessing the proportion of allocations to the various categories of applicant.

5. Please indicate if these apply to any of the protected characteristics

Protected groups	Positive impact	Negative impact
Race		
Disability		
Carers (for elderly, disabled or minors)		
Sex	YES – Male who identify as the highest number of homeless.	
Pregnancy and maternity (including breastfeeding)		
Sexual orientation		

Age (include children, young people, midlife and older people)	YES – 18/49 years who identify as the highest number of homeless.	
Religion, and or belief		
Gender reassignment		
Inequalities arising from socio-economic differences	YES – homeless applicants are at greatest risk of coming from disadvantaged backgrounds.	
Human Rights		

6. Evidence. What information have you used to make your assessment?

Performance data	
Internal consultation	
Consultation with affected groups	
Local statistics	Historic allocations data
National statistics	Housing First Pathfinder I-SPHERE Report by Herriot Watt University
Other	

7. Evidence gaps

<p>Do you need additional information in order to complete the information in the previous questions?</p> <p>No.</p>
--

8. Mitigating action

<p>Being in a situation where someone may lose their accommodation is traumatic. Proceeding along the homeless process of living in temporary accommodation and not knowing where they may be living in the future can be traumatic and can severely affect mental health. This is especially so among children. Improvements to quicken the process and reduce stress levels can only have positive health and financial outcomes.</p> <p>For someone who has complex needs and may be sleeping rough, a settled home can only bring improvements to their health and wellbeing. It could enable them to return to employment and a stable family lifestyle. Evidence of this will show in other areas such as NHS where there is already evidence that people present themselves to local GP's and hospitals several times before presenting as homeless. This is not a cost effective use of</p>

an already overburdened service. The RRTP will produce a lesser requirement for NHS services.

Funding can be examined and maximised for new build properties to potentially build a few extra units to accommodate those who may have been otherwise been offered a tenancy. Nomination Agreements are being considered by local registered Social landlords where Moray Council has a higher percentage of nominations than in the past. This will mean a reduction of the numbers on the housing list and create a faster turnaround for applicants.

9. Justification

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?

The RRTP is a requirement by Scottish Government so must be agreed.

Have you considered alternatives? No.

SECTION 3 CONCLUDING THE EIA

No negative impacts on any of the protected groups were found.	No
Reducing discrimination, harassment, victimisation or other conduct prohibited under the Equality Act 2010	No
Promoting equality of opportunity	Yes
Fostering good relations	
Negative impacts can be mitigated the proposals as outlined in question 8	N/A
The negative impacts cannot be fully mitigated but are justified as outlined in question 9.	N/A
It is advised not to go ahead with the proposals.	No

Decision

It is a requirement of Scottish Government to write and implement a Rapid Rehousing Transition Plan and that includes an element for Housing First. Ultimately, the proposals will reduce the trauma associated with homelessness and costs for both housing applicants and Moray Council.

Date of Decision:

Sign off and authorisation:

Service	
Department	
Policy/activity subject to EIA	
We have completed the equality impact assessment for this policy/activity.	Name: Position: Date:
Authorisation by head of service or director.	Name: Position: Date:
Please return this form to the Equal Opportunities Officer, Chief Executive's Office.	