

Equality Impact Assessment

Service: Environmental Services

Department: Housing and Property

Title of policy/activity: Local Housing Strategy 2013 - 2018

1. What are the aims and objectives of the policy/activity?

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 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 public and 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. It includes social rented housing, subsidised low cost housing for sale (discounted, shared ownership or shared equity) and low cost housing without subsidy (entry level housing for sale). Private rented accommodation available at lower cost than market rents and mid-market rent, should also be considered within the affordable housing category (ref: HNDA Guidance 2008). The term intermediate affordable housing is used to cover all types of affordable housing which are not social rented.

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2. List the evidence that has been used in this assessment

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|--|--|
| Internal data (customer satisfaction surveys; equality monitoring data; customer complaints) | HNDA 2011, Moray Health and Social Care Partnership Joint Commissioning Strategy for Older People |
| Consultation with officers or partner organisations | |
| Consultation with community groups | |
| External data (statistics, census, research) | |
| Other | |

3. Detail any gaps in the information that is currently available?

The HNDA identified a shortage of housing with 24hr support for people with learning disabilities. Since the HNDA's completion, detailed needs assessment work has commenced, associated with the development of the Moray Community Health and Social Care Partnership's Joint Commissioning Strategy for Older People 2012 – 2020. These findings will supersede the HNDA's findings for this needs group, but, at the time of writing, the findings were not available.

More information on the need for supported housing for people with mental health problems would strengthen the HNDA, and would provide reassurance that this needs group have not been discriminated against.

Ideally, more detailed information on the housing needs of LGBT groups would strengthen the findings of the HNDA, but it is acknowledged that these data are difficult to access.

4. What measures will be taken to fill the information gaps before the policy/ activity is implemented? These should be included in the action plan

| Measure | Timescale |
|--|-------------|
| Measures are dependant on the completion of the Joint Commissioning Strategy for Older People 2012 - 2020. | Autumn 2012 |

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5. Are there potential impacts on protected groups? Tick as appropriate

| | Positive | Negative | None | Unknown |
|--------------------------------|----------|----------|------|---------|
| Age – young | | | Y | |
| Age – elderly | Y | Y | | |
| Disability | Y | Y | | |
| Race | | Y | | |
| Religion or belief | | | Y | |
| Sex | | | Y | |
| Pregnancy and maternity | | | Y | |
| Sexual orientation | | | Y | |
| Gender reassignment | | | Y | |
| Marriage and civil partnership | | | Y | |

6. What are the potential negative impacts?

The HNDA 2011 has identified the following negative impacts:

- a) potential disadvantage to housing applicants assessed as requiring 1 bed, wheelchair accessible properties. Paras 8.7.3 to 8.7.10 refer.
- b) Since publishing the HNDA 2011, the Council has identified that this same potential disadvantage applies to Housing List applicants assessed as requiring 1 bed ground floor housing. These applicants are predominantly older and/or have mobility problems.
- c) Potential disadvantage to housing applicants which include a person with autistic spectrum disorder where Allocation policies do not consider number of bedrooms required appropriately.
- d) The HNDA 2011 has identified a need for increased budgets for disabled adaptations across all tenures. The ageing population is a significant driver increasing the need for disabled adaptations. The Council has a statutory obligation to provide funding for disabled adaptations for households residing in its own stock, and in the private sector. Provision by RSLs is less clear. In the current economic climate, any budget cut or reduction of provision would disadvantage older people and disabled people.
- e) The difference in statutory obligations to fund disabled adaptations between Councils and RSLs is a potentially negative impact on RSL tenants with disabilities.
- f) The HNDA 2011 has identified a shortage of specialist housing with appropriate support for older and disabled people.
- g) The lack of halting sites for gypsy travellers continues to disadvantage this ethnic minority group.

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- h) Research carried out in 2008/9 identified the housing needs of gypsies/travellers. During 2010, the Council consulted with local communities on the proposed location of 2 halting sites for gypsies/travellers, but to date, no acceptable sites have been identified.
- i) Older, smaller and single pensioner households have a higher risk of fuel poverty, particularly those in the private sector and in rural area

7. Have any of the affected groups been consulted. If yes, please give details of how this was done and what the results were. If no, how have you ensured that you can make an informed decision about mitigating steps?

Housing and Property Services have participated in consultation associated with development of the Joint Commissioning Strategy for Older People 2012- 2020, which included attendance at the Older Peoples Reference Group.

The Council has responded to the Scottish Government's Adaptations Working Group consultation.

The gypsy/traveller community were consulted as part of the housing needs research completed in 2009.

There was public consultation prior to consideration of 2 potential halting sites by Communities Committee on 7 December 2010

8. What mitigating steps will be taken to remove those impacts? These should be included in the action plan.

| Mitigating step | Timescale |
|--|-----------|
| <p>Households assessed as requiring 1 bedroom</p> <p>As part of the review of its Allocations Policy, currently ongoing throughout 2012, the Moray Council has already decided that all Housing List Applicants assessed as requiring 1 bed wheelchair accessible properties should be considered for 2 bed wheelchair accessible housing, to provide a greater likelihood of receiving an offer of rehousing. The Council's Allocations Policy Review is considering options to mitigate this disadvantage to other Housing List Applicants assessed as requiring 1 bed ground floor/ amenity housing. One option being considered is to combine the 1 and 2 bed ground floor housing lists and offer vacancies to the household in the greatest housing need, but this change will be subject to public consultation. Each RSL has its own Allocation Policy which may or may not mitigate this disadvantage.</p> | 2013 |

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| Mitigating step | Timescale |
|--|-----------|
| <p>Households with a member who has an autistic spectrum disorder (ASD)</p> <p>The Council's recently amended Medical Assessment procedure, permits an extra bedroom(s) on medical grounds (which includes ASD), where this is supported by an OT. More research is required to establish if this is replicated throughout local RSL's Allocation Policies.</p> | 2013/14 |
| <p>Gypsy/ Traveller households</p> <p>The Local Development Plan Main Issues Report states that "current Local Plan policies on residential caravans and travelling person's sites will have to be amended/revised to advice on where such sites can be located".</p> | 2013/14 |
| <p>Disabled Adaptations</p> <p>Potential for service redesign requirement following publication of the Scottish Government Adaptations Working Group final report, and associated guidance.</p> | 2013/14 |
| <p>Increase supply of specialist housing</p> <p>The Strategic Local Programme will seek to increase the supply of affordable housing for older and disabled people.</p> <p>More research required into the feasibility of development of Planning Policies which aim to facilitate an increase in supply of modestly priced housing for older people in the private sector.</p> | 2013/14 |
| <p>Fuel Poverty Risk</p> <p>Fuel poverty prevention measures, including improving the energy efficiency of homes and the provision of energy advice, to be targeted to older and vulnerable households, particularly those living in the private sector and in rural areas.</p> | 2013/14 |

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9. What steps can be taken to promote good relations between various groups?
These should be included in the action plan.

Provision of halting site(s) for Gypsies/ Travellers in an appropriate location, and reduction in unauthorised encampments, could promote good relations between the gypsy traveller community and the settled community.

10. How does the policy/activity create opportunities for advancing equality of opportunity?

The LHS includes outcomes relating to the needs of households with particular housing needs, which aim to ensure sufficient provision of adapted and purpose built housing for people with disabilities, ensure sufficient supported accommodation is available for older people, vulnerable homeless people and people with learning disabilities.

The need for these varying types of housing, covering all protected characteristics/ vulnerable groups, has been assessed and quantified in the HNDA 2011.

11. What monitoring arrangements will be put in place? These should be included in the action plan.

The LHS is a public document and subject to a peer review process, facilitated by the Scottish Government. Progress against each LHS outcome will be monitored annually and reported publicly, throughout the life of the LHS. The consultative draft LHS will include an Action Plan and Performance Monitoring Framework, still in development. Many of the LHS indicators have been selected from Improvement Service, Menu of Local Outcome Indicators available at <http://www.improvementservice.org.uk/local-outcome-indicators/> to ensure a good fit with SOA Outcomes, and with National Indicators.

12. What is the outcome of the assessment? Tick as appropriate.

| | | |
|---|--|---|
| 1 | No impacts have been identified | |
| 2 | Impacts have been identified, these can be mitigated as outlined in question 7 | X |
| 3 | The activity will have negative impacts which cannot be mitigated fully | |

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13. Set out the justification that the activity can and should go ahead despite the negative impact?

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Sign off and authorisation

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|--|---|
| Department | Environmental Services |
| Title of Policy/activity | Local Housing Strategy 2013 - 2018 |
| We have completed the equality impact assessment for this policy/activity. | Name: Fiona Geddes Position: Housing Strategy Officer Date: |
| Authorisation by Director or Head of Service | Name: Jill Stewart Position: Head of Housing and Property Date: |

The impact assessment should now be authorised by either the Director or Head of Service.

Please return this form, along with the completed screening process and full assessment forms, to the Equal Opportunities Officer, Chief Executive's Office