



## INTEGRATED IMPACT ASSESSMENT (IIA)

This assessment covers:

- Equalities & Socio-Economic Duties
- Human Rights & Rights of the Child (UNCRC)

### EXECUTIVE SUMMARY

| DATE<br>DD/MM/YY | UPDATE(S) - Add section(s) revised & brief note of revision. Refer IIA Guidance.<br>E.g. - First draft IIA for consideration at XXX Committee/Board on DD/MM/YY<br>E.g. - Q.7 Revised with outcome of public consultation and results | SHAREPOINT<br>VERSION DETAILS<br>ADDED BY CMT |
|------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|
| 16/07/25         | 1 <sup>st</sup> draft IIA for consideration at Housing & Community Safety Committee on 9 September 2025                                                                                                                               |                                               |
| 12/03/26         | No changes following public consultation. IIA approved by Housing & Community Safety Committee on 12 March 2026.                                                                                                                      |                                               |

**Name of proposal (Note - proposal covers any strategy, plan, policy, project, budget saving, change to service):**  
Local Housing Strategy 2025-2030

| Is this a:                                                      | Please Tick <input checked="" type="checkbox"/> |
|-----------------------------------------------------------------|-------------------------------------------------|
| New strategy, policy, project, plan, service?                   |                                                 |
| Change to an existing strategy, policy, project, plan, service? | <input checked="" type="checkbox"/>             |
| Budget proposal?                                                |                                                 |

| STAGE 1 SCREENING - DO I NEED AN IIA?                                                                                   | If 'Yes' or 'Maybe' please go to Stage 2 and complete full IIA |                                     |          |          | If all No, sign off IIA |
|-------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|-------------------------------------|----------|----------|-------------------------|
| Does the proposal impact(s) any of the following:                                                                       | Yes                                                            |                                     | Maybe    |          | No                      |
|                                                                                                                         | Positive                                                       | Negative                            | Positive | Negative |                         |
| Equalities – any <b>positive or negative impact(s)</b> to people from <a href="#">protected characteristic group(s)</a> | <input checked="" type="checkbox"/>                            | <input checked="" type="checkbox"/> |          |          |                         |
| <a href="#">Socio-economic disadvantage</a> – low / no income / wealth or deprivation                                   | <input checked="" type="checkbox"/>                            |                                     |          |          |                         |
| <a href="#">Human Rights</a> of individuals                                                                             | <input checked="" type="checkbox"/>                            |                                     |          |          |                         |
| <a href="#">Rights of Children or Young People</a>                                                                      | <input checked="" type="checkbox"/>                            |                                     |          |          |                         |

**Reasoning – Please briefly describe the reasons you have ticked the above boxes i.e. why it will/may affect these groups positively or negatively.**

The Local Housing Strategy (LHS) 2025 – 2030 aims to address inequalities in housing by improving access to housing across all tenure, supporting vulnerable households and those with specialist housing needs. Its role is to support households who may be at a disadvantage to ensure they have access to suitable housing options that are affordable to them.

This LHS has been designed with the aim of reducing socio-economic disadvantage and mitigate any potential impact on human rights or the rights of children.

The Scottish Government has published guidance to help local authorities develop their LHS. The guidance requires equality issues to be mainstreamed throughout the LHS.

|                                         |  |      |  |
|-----------------------------------------|--|------|--|
| Lead Officer<br>Signature               |  | Date |  |
| Others involved in<br>initial screening |  |      |  |

## STAGE 2 – FULL IIA

### Brief description of the proposal

#### 1. Please describe what the proposal is.

The Housing (Scotland) Act 2001 requires all local authorities to publish a Local Housing Strategy (LHS). The LHS is a planning tool which sets out the actions the Council and its partners will take to seek to achieve its aim. The LHS's vision, as stated in the consultative draft LHS 2025-30 is: "In Moray everyone has access to the right home, in the right place at the right time."

To achieve this vision and tackle the main priorities for action identified by local residents, partners and stakeholders, the following four LHS priorities have been defined:

1. Building more homes creates sustainable communities and enables economic growth
2. Making better use of existing homes prevents homelessness and improves housing options and choice
3. Partnership working maximises housing's role in improving health and wellbeing
4. Improving property condition and achieving affordable warmth is enabled in all homes

#### 2. Who are the main stakeholders?

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 also uses the [Housing Need and Demand Assessment \(HNDA\)](#) as a key evidence base, the development of which also includes extensive stakeholder consultation. Main stakeholders include:

- 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.
- A wide range of housing professionals and partner organisations who have an interest in housing and housing related pressures/issues such as the Scottish Government, social housing providers, Integration Joint Board/Health and Social Care, NHS, employers and housing developers.

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

There is no reduction or removal of existing services.

#### 4. How will the proposal affect your customers?

The strategy aims to ensure housing need is met within the agreed priorities.

#### 5. What impact will the proposal have on staff providing the service?

No change to resources, the strategy is delivered within existing budgets.

### 6. IMPACTS

#### EQUALITIES AND SOCIO-ECONOMIC DUTIES - Please ✓ any impact to each group

| <a href="#">Protected Groups</a> – Click here for info         | Negative | Positive | Considerations                                                                                                                                                                            |
|----------------------------------------------------------------|----------|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Age (include children, young people, midlife and older people) |          | ✓        | <ul style="list-style-type: none"><li>• Responds to the needs of Moray's ageing population by prioritising housing solutions and adaptations to make sure homes are suitable to</li></ul> |

|                                                                       |   |   |                                                                                                                                                                                                                                                                                                                                                                                         |
|-----------------------------------------------------------------------|---|---|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                       |   |   | <p>the needs of older people and support independent living.</p> <ul style="list-style-type: none"> <li>• Recognises the need for intergenerational housing solutions</li> <li>• Supports initiatives that stimulate turnover or encourage households to move from properties which do not meet their needs e.g. through an incentive scheme to release larger family homes.</li> </ul> |
| Carers (for elderly, disabled or minors)                              |   | ✓ | No specific impacts identified but accessible housing delivery considers the needs of households with carers and those who may need carers in the future.                                                                                                                                                                                                                               |
| Disability                                                            |   | ✓ | Supports the delivery of accessible and specialist housing as well as investment in aids, adaptations and technology-enabled care for independent living.                                                                                                                                                                                                                               |
| Gender reassignment                                                   |   |   | No specific impacts identified.                                                                                                                                                                                                                                                                                                                                                         |
| Marriage and civil partnership                                        |   |   | No specific impacts identified.                                                                                                                                                                                                                                                                                                                                                         |
| Pregnancy and maternity (including breastfeeding)                     |   | ✓ | Supports those experiencing overcrowding and aims to prevent homelessness or provide appropriate temporary accommodation to families if needed.                                                                                                                                                                                                                                         |
| Race                                                                  | ✓ |   | Moray lacks authorised halting sites for Gypsy/Travellers and Travelling Show People. Unauthorised Encampment Protocol respects their cultural identity and affirming their cultural identity and right to a travelling lifestyle.                                                                                                                                                      |
| Religion and / or belief                                              |   |   | No specific impacts identified.                                                                                                                                                                                                                                                                                                                                                         |
| Sex                                                                   |   | ✓ | Supports those experiencing domestic abuse through housing and support.                                                                                                                                                                                                                                                                                                                 |
| Sexual orientation                                                    |   |   | No specific impacts identified.                                                                                                                                                                                                                                                                                                                                                         |
| Inequalities arising from <a href="#">socio-economic disadvantage</a> |   | ✓ | <ul style="list-style-type: none"> <li>• Tackles fuel poverty, housing affordability, and child poverty to support low-income households.</li> <li>• Supports low-income households through affordable housing and energy efficiency measures.</li> </ul>                                                                                                                               |

| <b>HUMAN RIGHTS</b>                                                                  | <b>If applicable, briefly state if / how right is engaged</b>                                                                                                                                                                                                                                                                                                               |
|--------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <a href="#">Article 5 Right to liberty and security</a>                              | Prevents homelessness and supports independent living. Reduces risks of institutionalisation or detention due to lack of housing.                                                                                                                                                                                                                                           |
| <a href="#">Article 6 Right to a fair trial</a>                                      | N/A                                                                                                                                                                                                                                                                                                                                                                         |
| <a href="#">Article 8 Respect for private / family life, home and correspondence</a> | The LHS supports this right by: <ul style="list-style-type: none"> <li>• Preventing homelessness.</li> <li>• Enabling people to remain in their homes through adaptations and support.</li> <li>• Addressing overcrowding and under-occupation.</li> <li>• Supporting Gypsy/Traveller and Travelling Show Peoples' right to maintain their cultural way of life.</li> </ul> |
| <a href="#">Article 10 Freedom of expression</a>                                     | The LHS promotes community engagement and consultation, allowing individuals and groups to express views on housing needs and policies.                                                                                                                                                                                                                                     |
| <a href="#">Article 11 Freedom of assembly and association</a>                       | The LHS supports community-led housing and local place planning, which may facilitate collective action and association.                                                                                                                                                                                                                                                    |
| <a href="#">Article 12 Right to marry</a>                                            | N/A                                                                                                                                                                                                                                                                                                                                                                         |
| <a href="#">Article 14 Protection from discrimination in respect of these rights</a> | The LHS eliminates discrimination when accessing housing and outcomes for protected groups.                                                                                                                                                                                                                                                                                 |
| <a href="#">Protocol 1, Article 1- Right to peaceful enjoyment of property</a>       | The LHS protects property rights by: <ul style="list-style-type: none"> <li>• Supporting homeowners with repairs and adaptations.</li> <li>• Encouraging responsible private renting.</li> <li>• Preventing unlawful eviction through homelessness prevention.</li> </ul>                                                                                                   |
| <a href="#">Protocol 1, Article 2 - Right to education</a>                           | N/A                                                                                                                                                                                                                                                                                                                                                                         |
| <a href="#">Protocol 1, Article 3 - Right to free elections by secret ballot</a>     | N/A                                                                                                                                                                                                                                                                                                                                                                         |

| <b>RIGHTS OF CHILDREN &amp; YOUNG PEOPLE (UNCRC)</b> | <b>If applicable, briefly state if / how right is engaged</b>                                                                                                                                                                                                                                                                                                                                         |
|------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Article 2 – Non discrimination                       | The LHS includes a strong commitment to equality and inclusion. It addresses housing inequalities that affect children from low-income families, minority ethnic backgrounds, and those with disabilities. The strategy also recognises the needs of the children of the Gypsy/Traveller and Travelling Show People community, affirming their cultural identity and right to a travelling lifestyle. |
| Article 3 – Best Interest of a Child                 | The LHS prioritises safe, stable, and suitable housing for families, which is essential for children's wellbeing. It supports homelessness prevention, reducing the risk of children                                                                                                                                                                                                                  |

|                                                     |                                                                                                                                                                                                                                                                                                                                                                             |
|-----------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                     | experiencing housing instability or living in temporary accommodation. The LHS also promotes child-friendly communities through local place planning and access to services.                                                                                                                                                                                                |
| Article 6 – Right to life, survival and development | The LHS contributes to children’s development by: <ul style="list-style-type: none"> <li>• Tackling child poverty through affordable housing.</li> <li>• Improving housing conditions to reduce health risks (e.g. damp, overcrowding).</li> <li>• Supporting energy efficiency and affordable warmth, which are critical for children’s health and development.</li> </ul> |
| Article 12 – Respect the views of the child         | While the LHS includes broad community consultation, it does not include the views of children.                                                                                                                                                                                                                                                                             |
| Article 23 – Children with a disability             | The LHS allows provision for meeting housing need of disabled children.                                                                                                                                                                                                                                                                                                     |

| <b>7. Evidence - Please list the information you have used to make your assessment to date?</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Performance data</b>                                                                         | Statutory indicators within Scottish Government Returns and the Annual Return on the Charter.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Internal consultation</b>                                                                    | Will take place formally as part of the Committee process but there has been extensive consultation within housing and other council representation prior to the development of the draft strategy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Consultation with affected groups</b>                                                        | <ul style="list-style-type: none"> <li>• Extensive research and consultation carried out as part of 2023 HNDA detailed at: <a href="http://www.moray.gov.uk/hnda">www.moray.gov.uk/hnda</a>. This included a primary research survey with 911 responses and a separate assessment on the needs of Gypsy/Travellers and Travelling Show People.</li> <li>• LHS early engagement survey completed by 360 residents and community representatives to identify the current circumstances, future intentions and housing aspirations of Moray households and confirm the earlier findings of the HNDA.</li> <li>• Multi-agency steering group formed to provide a governance framework for the development and implementation of the LHS. Representatives include partners from Moray Council, (Housing, Planning, Homelessness, Private Sector and LHEES teams), Registered Social Landlords and HSCP partners.</li> <li>• Stakeholder conference on 20 March 2025 (online) with over 50 partners and stakeholders attended the event, including representatives from public, private, third and community sectors.</li> </ul> |

|                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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|                            | <ul style="list-style-type: none"> <li>• Four half-day workshop sessions were held to systematically appraise LHS options against pre-determined criteria with subject matter experts to formulate action plan.</li> <li>• Draft strategy to be presented to Housing and Community Safety Committee for consideration and approval to commence formal consultation with the public and undergo peer review from both the Scottish Government and another local authority.</li> </ul> |
| <b>Local statistics</b>    | <ul style="list-style-type: none"> <li>• Primary and secondary research gathered for the 2023 HNDA and LHS</li> <li>• Primary research from LHS early engagement survey.</li> <li>• Data collated internally, and through other Council departments.</li> </ul>                                                                                                                                                                                                                      |
| <b>National statistics</b> | Existing published sources e.g. NRS population/household estimates, Scottish Government datasets.                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Other</b>               | <ul style="list-style-type: none"> <li>• Scottish Government local housing strategy guidance (2019).</li> <li>• National strategies such as Housing to 2040.</li> <li>• Local authority strategies such as the Moray Local Outcomes Improvement plan (LOIP).</li> <li>• Departmental strategies such as the Local Development Plan (LDP) and Local Heat and Energy Efficiency Strategy (LHEES)</li> <li>• Local housing strategies of other local authorities.</li> </ul>            |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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| <b>8. Evidence gaps</b> - Do you need any additional information to complete Q7 Evidence above?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>9. Mitigating action(s)</b> - Can the impact(s) identified above be lessened in any way? Please explain                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Mitigations for identified potential impacts include: <ul style="list-style-type: none"> <li>• <u>No authorised halting site for Gypsy/Travellers and Travelling Show People in Moray</u> - The Housing Service currently follow an Unauthorised Encampment Protocol to ensure the provision of waste facilities, serviced toilets as well as housing advice and signposting where applicable to respect their culture. The Moray Local Development Plan provides a critical mechanism for addressing the long-standing shortfall in sites for the Gypsy/Traveller and Travelling Show People community. Preparatory work for the new Local Development Plan (Planning) will include consideration of the lack of authorised sites, dependent on the level of engagement that can be sought with the Gypsy/Traveller and Travelling Show People community.</li> </ul> |
| <b>10. Justification</b> - If there are no mitigating action(s) identified that can lessen the negative impacts, please explain any justification(s) that may allow the proposal to go ahead? <span style="color: red;">Please delete as appropriate*</span>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| The LHS supports equality, diversity and inclusion in every aspect that is within the Housing Services' control.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

| STAGE 3 – IMPACT SUMMARY                                                                                                          |  | Please Tick (✓) |
|-----------------------------------------------------------------------------------------------------------------------------------|--|-----------------|
| Some potential negative impacts have been identified in terms of the Council's Public Sector Equality Duty (PSED) in relation to: |  |                 |
| • Reducing discrimination, harassment, victimisation                                                                              |  | ✓               |
| • Promoting equality of opportunity                                                                                               |  | ✓               |
| • Fostering good relations                                                                                                        |  | ✓               |
| The proposals interfere with Human Rights and / or the Rights of the Child                                                        |  |                 |
| Negative impacts <b>can be mitigated</b> as per Q9                                                                                |  | ✓               |
| Negative impacts <b>cannot be fully mitigated but are justified</b> as per Q10                                                    |  |                 |
| Negative impacts <b>cannot be fully mitigated or justified</b> as per Qs 9 & 10                                                   |  |                 |
| Further consultation with affected groups is needed                                                                               |  |                 |
| It is advised not to go ahead with the proposals                                                                                  |  |                 |
| <b>FINAL DECISION – Please set out the rationale for deciding to proceed with the proposal or not.</b>                            |  |                 |
|                                                                                                                                   |  |                 |
| <b>Date of Final Decision</b>                                                                                                     |  |                 |

| FINAL SIGN OFF AND AUTHORISATION     |                                |                                           |
|--------------------------------------|--------------------------------|-------------------------------------------|
| <b>Service</b>                       | Economy, Environment & Finance |                                           |
| <b>Department</b>                    | Housing and Property           |                                           |
| <b>IIA Completed By</b>              | <b>Name</b>                    | Daska Murray                              |
|                                      | <b>Position</b>                | Senior Housing Officer (Strategy)         |
|                                      | <b>Date</b>                    | 16.07.25                                  |
| <b>Head of Service Authorisation</b> | <b>Name</b>                    | Edward Thomas, Head of Housing & Property |
|                                      | <b>Date</b>                    |                                           |
| <b>Permission to Publish IIA</b>     | 12.03.26                       |                                           |

Please return the completed IIA to [equalities@moray.gov.uk](mailto:equalities@moray.gov.uk)