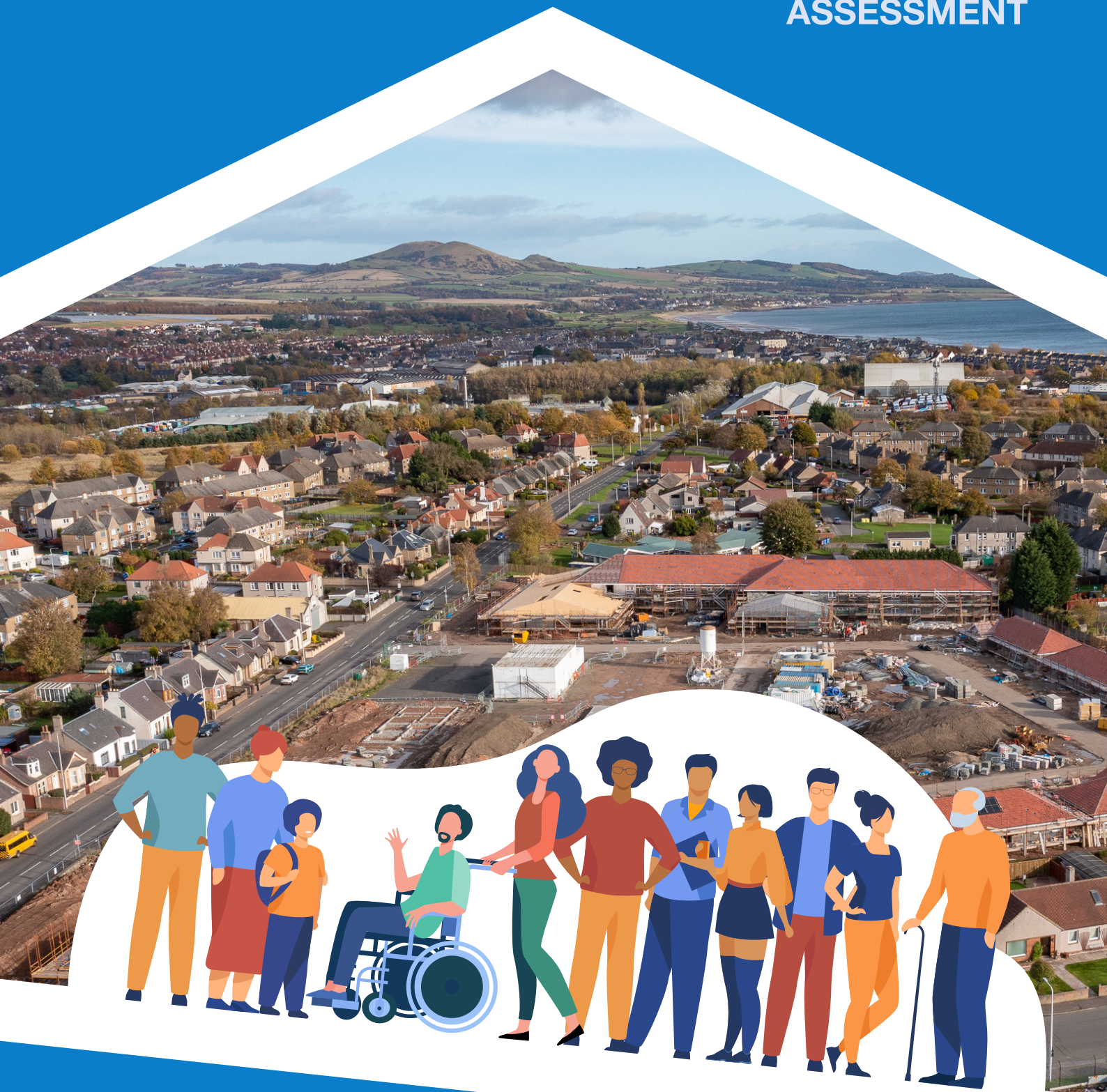




# LOCAL HOUSING STRATEGY

## 2022 - 2027

### EQUALITIES IMPACT ASSESSMENT



## EQUALITIES IMPACT ASSESSMENT

### Introduction

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The Equality Act 2010 became law in April 2011, introducing a general equality duty for the public sector in the UK. The Act consolidates, simplifies and harmonises previous areas of equality legislation. The Act requires Scottish public bodies to pay 'due regard' to the need to eliminate unlawful discrimination, victimisation and harassment; advance equality of opportunity and foster good relations. These requirements apply across the 'protected characteristics' of age; disability; gender; gender reassignment; pregnancy and maternity; race; religion and belief; sex and sexual orientation and to a limited extent to marriage and civil partnership.

The Fairer Scotland Duty, Part 1 of the Equality Act 2010, comes into force in Scotland from April 2018. It places a legal responsibility on public bodies in Scotland to actively consider how they can reduce inequalities of outcome caused by socio-economic disadvantage when making strategic decisions.

The Children and Young People (Scotland) Act 2014 establishes a framework for promoting the rights of children and young people through the provision of services and support, and as part of 'getting it right for every child' policy implementation. Public authorities also have a duty to comply with the European Convention of Human Rights, the Human Rights Act 1998 having increasing relevance within the public sector service provision.

Local Housing Strategy (LHS) guidance (2019) emphasises the importance of partnerships considering a range of equality needs and to plan for housing improvement through the LHS. The legislation and LHS guidance also state that public bodies have a statutory duty to equality impact assess policies, plans and proposals to demonstrate how equality issues have been considered and how the statutory public sector duties have been met.

Given the overlap in these requirements, an equality impact assessment has been carried out on behalf of the Fife Housing Partnership which takes account of the Fairer Scotland duty, human rights and the rights of children and young people.

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### Equalities Impact Assessment

LHS Guidance (2019) recommends an approach for equalities impact assessment (EQIA) to consider the extent to which evidence is available in relation to the housing requirements of different groups of people. EQIAs provide a framework to determine how the development of a new policy, plan or programme may impact either positively or negatively on different sectors of a community, focusing on specific groups of people within society who are at risk of discrimination and social exclusion.

EQIA's involve ensuring that where possible, any negative consequences are eliminated or minimised and opportunities for promoting equality are maximised by:

- Taking account of the needs, circumstances and experiences of those who are affected.
- Identifying actual and potential inequalities in outcomes.
- Considering other ways of achieving the aims of a policy in order to minimise or remove any possible adverse impact.

In accordance with the legislative framework and LHS guidance, the EQIA has been prepared at the point of drafting the LHS to allow any improvement actions to be built into the finalised strategy. Where possible, the EQIA incorporates data and analysis around equality issues based around the five priorities of the LHS.

Title of Proposal	Fife Housing Partnership Local Housing Strategy (LHS) 2022-2027
Brief description of proposal (including intended outcomes & purpose)	The Housing (Scotland) Act 2001 requires local authorities in partnership to develop an understanding of housing need, demand and provision and to provide a plan for housing improvement through the LHS. This is Fife's fifth LHS based on a five-year-term from 2022-2027 which builds on the successes and experience of three previous LHSs.
Lead Directorate / Service / Partnership	The Fife Housing Partnership
EqIA Lead Person	Mhairi Mullen Service Manager: Income, Poverty and Private Housing
EqIA contributors	The Fife Housing Partnership
Start date of EqIA	May 2022

Priority 1 Ending Homelessness			
Protected Characteristic	Impact		
	Positive	Negative	None
Age	✓		
Disability	✓		
Gender reassignment			✓
Marriage and Civil Partnership			✓
Pregnancy and Maternity			✓
Race (includes Gypsy Traveller)	✓		
Religion and/or belief			✓
Sex	✓		
Sexual Orientation			✓
Other Groups			
Income/employment deprived	✓	✓	
Single people	✓		
Families	✓		
Students			✓
Ex-offenders and managed offenders	✓		
Travelling show people			✓
Ex-forces personnel	✓		

## Age

The level of homelessness amongst the very young and more mature households is disproportionate to the needs of those aged 18-59. The predominant demand for homeless services comes from single people (26-59 years old, 68% of all applicants). Younger persons age groups are at risk of homelessness, for example those aged 16-17 years presenting as homeless each year and those having formerly been in local authority residential care.

21 % of applications on the Fife Housing Register (FHR) are households headed by people aged 60 years and over, many of these requiring special forms of housing, support requirements and having social medical needs.

Specific outcomes are in place to prevent all protected characteristic groups from becoming homeless. Specific outcomes have also been put in place to enable people to sustain their accommodation, this will especially benefit younger persons and those who had stayed in residential care. Outcomes to increase housing access will positively benefit a range of age groups providing

suitable housing can be provided to meet demand.

### **Disability**

A high proportion of people accessing homelessness services have a physical disability or long-term health issue. The Fife Housing Register contains around 30% of households with social/medical needs and 10% have a physical disability.

Outcomes to provide housing options advice and accommodation will by default positively benefit applicants with a disability or long-term health issue.

55% of Fife households have one or more of the members who are long term sick or disabled (Scotland 43%). While there will be positive impacts through the LHS for disabled people, there appears to be an over-representation of people with ill-health or disability than Scotland as a whole. This group of people have also been impacted disproportionately by Covid-19.

### **Race**

There is an over-representation of non-Scottish/British homelessness applicants, around 2% of all homeless applications. Outcomes to provide housing options advice and accommodation will by default positively benefit non-Scottish/British homeless applicants.

Research suggests there are 178 Gypsy/Traveller households living on official and private sites, encampments and in permanent housing in Fife - equivalent to around 630 people. Outcomes to provide seasonal site/s and improve existing sites will positively benefit Gypsy / Traveller households.

### **Sex**

1 in 5 women will experience domestic abuse at some point in their lives irrespective of age, religion, ethnic background, wealth or education. Outcomes to provide housing and support for domestic abuse victims will have a greater positive impact on women.

There is an over-representation of males presenting as homeless principally for reasons of relationship breakdown. Outcomes to provide housing options advice and accommodation will by default positively benefit men presenting as homeless.

### **Income/employment deprived**

Rent levels in temporary accommodation are high and can be unaffordable to those not receiving Housing Benefit. Fife Council considers the individual circumstances of each customer in temporary accommodation that is not claiming Housing Benefit and ensures that the rent charged is realistic to their income. In this way the group is also positively impacted by current policy.

### **Single People**

Most homeless applicants are single people, accounting for 63% of all homeless applications. Outcomes to provide housing options advice and accommodation will by default positively benefit single people presenting as homeless.

Outcomes to increase housing access will positively benefit single people providing suitable housing can be provided to meet demand.

## Families

22% of homeless households are single parent families, with 23% of all homeless applications having dependent children. 31% of all Fife Housing Register (FHR) applications are single parent families, with 58% of all FHR applications containing children. Significant efforts have been made to reduce the number of children in temporary accommodation. Outcomes directly addressing the reduction of children in homelessness by default positively benefit families presenting as homeless.

## Ex-forces personnel

This group is generally over-represented in homelessness and can be associated with issues of physical disability and mental ill-health. This group can be positively impacted if supported through a discharge protocol linked to housing, although this may not always be the case.

## Other vulnerable groups

Protocols have been developed to ensure that other vulnerable groups are given access to assured advice and suitable housing options. These vulnerable groups include Ex-Offenders and Managed Offenders, Young Care Leavers, gender-based violence and specific needs. Outcomes to prevent homelessness and increase housing access through protocols will positively benefit these groups, including Rapid Rehousing Transitional Plans and implementation of the Housing First approach.

Evidence used	Source of evidence
Household profiles	HL1 / FHR
Homelessness Assessment	Rapid Rehousing Transitional Plan
Fife Domestic Abuse and Sexual Abuse Partnership statistics	Fife Violence Against Women Partnership Action Plan 2019-2022
Evidence gaps	Planned action to address evidence gaps
Profile of households housed through the Fife Housing Register against the general equality profile	Discussion to be undertaken through FHR Partnership and actions to be developed e.g. equality reporting where not already in place

<b>Priority 2 More Homes in the Right Places</b>			
<b>Protected Characteristic</b>	<b>Impact</b>		
	<b>Positive</b>	<b>Negative</b>	<b>None</b>
Age	✓		
Disability	✓		
Gender reassignment			✓
Marriage and Civil Partnership			✓
Pregnancy and Maternity			✓
Race (includes Gypsy Traveller)			✓
Religion and/or belief			✓
Sex			✓
Sexual Orientation			✓
<b>Other Groups</b>			
Income/employment deprived	✓		
Single people	✓		
Families	✓		
Students			✓
Ex-offenders and managed offenders			✓
Travelling show people			✓
Ex-forces personnel			✓

### **Age**

Fife's population comprises 374,130 persons, with a growing number of people aged 75 and over, expected to increase by 31% from 2018-2028. Those of working age is stable over the same decade however is projected to decline thereafter. The population is also expected to remain stable over the five-year term of the LHS. An estimated 169,886 households live in Fife representing an increase of 5.8% over the last decade, the most significant increase being in 'older smaller' households reflecting the ageing population profile. The total number of households are projected to increase to 173,335 by 2027. The demographic changes are shown adding pressure to housing supply with a mis-match of stock to need having been identified.

The outcomes to provide new housing to suit a range of age groups e.g. Extra Care and Retirement homes will lead to positive impacts for this equality strand where supply can keep pace with demand. Like the above, outcomes to provide housing to suit a range of age groups could benefit children and young people. This will also be the case with wider policy initiatives, for example the continuation of

property acquisition to permanently house families living in homelessness temporary accommodation.

### **Disability**

An estimated 55% of households contain members who have a long-term illness or disability. An estimated 6% of households in Fife live in dwellings which have aspects that restrict activity of a long term ill/disabled household member. A wheelchair and accessible housing study carried out in Fife during 2022 suggests that 2,689 accessible homes and 612 wheelchair homes are required across Fife to accommodate households with an unmet need.

### **Income/employment deprived**

Around 39% of applicants on the Fife Housing Register (who have provided information) are unemployed or retired. New supply delivered through the LHS will be targeted to those in the greatest housing need and, by default, this is likely to positively impact those who are income or employment deprived.

### **Single People**

Most homeless applicants are single people, comprising 63% of applications. Outcomes to increase housing supply will positively benefit single people providing suitable housing can be provided to meet demand.

### **Families**

Around 34% of applications to the Fife Housing Register were from family households. Outcomes to increase housing supply will positively benefit families providing suitable housing can be provided to meet demand.

<b>Evidence used</b>	<b>Source of evidence</b>
Household profiles	Fife Housing Register
Household profiles	National Records of Scotland
Household profiles	Scottish Household Survey 2019
<b>Evidence gaps</b>	<b>Planned action to address evidence gaps</b>
Delivery of new homes across equality strands	Discuss with Fife Housing Register Partnership and establish future reporting where not already in place.



<b>Priority 3 A Suitable Home</b>			
<b>Protected Characteristic</b>	<b>Impact</b>		
	<b>Positive</b>	<b>Negative</b>	<b>None</b>
Age	✓		
Disability	✓		
Gender reassignment			✓
Marriage and Civil Partnership			✓
Pregnancy and Maternity			✓
Race (includes Gypsy Traveller)	✓		
Religion and/or belief			✓
Sex			✓
Sexual Orientation			✓
<b>Other Groups</b>			
Income/employment deprived			✓
Single people			✓
Families			✓
Students			✓
Ex-offenders and managed offenders			✓
Travelling show people			✓
Ex-forces personnel			✓
Other vulnerable adults	✓		

### **Age**

Fife's population comprising 374,130 persons, with a growing number of people aged 75 and over expected to increase by 31% from 2018-2028. The age 75 and over population were also at greater risk from Covid-19. The working age population is expected to remain stable over the term of the LHS. While the population is expected to remain stable over the five-year term of the LHS, it is expected to decrease by 0.4% over the next decade. The outcomes to provide housing support and adaptations to older people will lead to positive impacts for this equality strand where supply can keep pace with demand.

### **Disability**

An estimated 48% of households contain members who have a long-term illness or disability. An estimated 6% of households in Fife live in dwellings which have aspects that the restrict activity of a

long term ill/disabled household member. 3% of Fife households require a housing adaptation. Based on demographic forecasts, by 2030 the number of people with dementia in Fife will almost double to an estimated 11,000 people. A wheelchair and accessible housing study carried out in Fife during 2022 suggests that 2,689 accessible homes and 612 wheelchair homes are required across Fife to accommodate households with an unmet need. The outcomes to provide housing support and adaptations for disabled people will lead to positive impacts for this equality strand where supply can keep pace with demand.

**Race**

Gypsy Traveller communities are particularly susceptible to issues of ill-health linked to factors around their standard of accommodation. The improvement of site conditions will provide positive outcomes for this group.

**Other vulnerable adults**

More complex client need and an increasing number of clients have been identified as the most concerning trend in relation to the provision of housing support. A range of vulnerable groups will be positively impacted where supply can keep pace with demand.

Evidence used	Source of evidence
Household profiles and adaptations data	Scottish House Condition Survey
Demographic data/Population and Households	Office for National Statistics
Local Research	North Star Consulting and Fife Council (2012) Research into the Impact of Housing Support Interventions
Evidence gaps	Planned action to address evidence gaps
Equalities issues in relation to supply/demand	Discussions with Health and Social Care Partnership to identify unmet need for housing support and adaptations/equality monitoring of client groups waiting for and receiving these services.

Priority 4 A Quality Home			
Protected Characteristic	Impact		
	Positive	Negative	None
Age	✓		
Disability	✓		
Gender reassignment			✓
Marriage and Civil Partnership			✓
Pregnancy and Maternity			✓
Race (includes Gypsy Traveller)			✓
Religion and/or belief			✓
Sex			✓
Sexual Orientation			✓
<b>Other Groups</b>			
Income/employment deprived	✓		
Single people			✓
Families			✓
Students	✓		
Ex-offenders and managed offenders			✓
Travelling show people			✓
Ex-forces personnel			✓

### Age

Of the 127,877 private sector households in Fife, 27% are headed by a person 65 years and over and 22% by someone 55 to 64 years. Issues for older people in private housing are linked to long-term sickness and/or disability. Issues for younger people and families are more likely to be linked to housing affordability, condition, vulnerability, overcrowding, etc.

### Disability

According to the Scottish House Condition Survey 52% of people in owner occupied homes and 39% in private rented homes are long-term sick or disabled. Household illness and disability impacts particularly on the elderly in single older or older smaller households, more so during the time of the

Covid-19 pandemic. The most prevalent difficulties faced by these people are climbing stairs and getting in/out of the bath. The LHS outcome to provide a Scheme of Assistance (SOA) will have a positive impact on this group of people.

### **Income/employment deprived**

Poor housing conditions are mostly associated with those in social or economic disadvantage. Private sector households particularly affected include older people, those on low incomes and the vulnerable.

### **Students**

The Higher Education Statistics Authority has reported that in 2020/21 there were 11,485 students attending St Andrews University, comprising 9,015 undergraduates and 2,470 post-graduates. By default, these students are likely to be positively impacted by measures to licence/register private rented homes due to the high concentration of private renting in St Andrews.

<b>Evidence used</b>	<b>Source of evidence</b>
Private Sector House Condition Survey 2019	Fife Council/David Adamson and Partners
HMO Licensing/Private landlord registration	Fife Council
Scottish House Condition Survey	Scottish Government
<b>Evidence gaps</b>	<b>Planned action to address evidence gaps</b>
Equality reporting within Scheme of Assistance	PSHIG to investigate and ensure reporting mechanisms in place
Issues of equality within private renting expressed by those in sector	Outcome to develop a Private Tenant Forum will be implemented through LHS

Priority 5 A Warm Low Carbon Home			
Protected Characteristic	Impact		
	Positive	Negative	None
Age	✓		
Disability	✓		
Gender reassignment			✓
Marriage and Civil Partnership			✓
Pregnancy and Maternity			✓
Race (includes Gypsy Traveller)			✓
Religion and/or belief			✓
Sex			✓
Sexual Orientation			✓
<b>Other Groups</b>			
Income/employment deprived	✓		
Single people	✓		
Families	✓		
Students			✓
Ex-offenders and managed offenders			✓
Travelling show people			✓
Ex-forces personnel			✓
Rural Areas	✓		

### Age

Older people are more likely to be impacted by fuel poverty - an estimated 17,000 pensioner households are fuel poor. Some data zones are reported as high in fuel poverty owing to a high number of single pensioner residents likely to be living in poor EPC rated properties. Outcomes to address fuel poverty and poverty in housing will by default impact on older households.

### Disability

Disabled people and families with disabled children are faced with a combination of being in poverty or on a low income with additional essential costs of living. Disabled people are likely to require additional energy, including heating and lighting if spending a considerable amount of time at home, leading to a choice of 'heat or eat'. Outcomes to reduce fuel poverty are likely to positively impact on

this group, however local research could be undertaken to understand the uptake of fuel poverty measures by equality strand.

### **Income/employment deprived**

Certain data zones consistently return high levels of fuel poverty as both a percentage and total number of properties. These areas have previously been identified as deprived through SIMD ranking. Child poverty levels are highest in the most deprived SIMD areas. One in three of the working population in the most deprived SIMD areas is claiming benefits. Fife’s fuel poverty mapping is being used to target action which will lead to positive outcomes for people living in income / employment deprived areas.

### **Single People**

Certain data zones are reported as high in fuel poverty owing to a high number of single pensioner residents likely to be living in poor EPC rated properties. Overall, one-quarter of fuel poor households are single adults. Outcomes to reduce fuel poverty are likely to positively impact on this group, however local research could be undertaken to understand the uptake of fuel poverty measures by equality strand and household profile.

### **Families**

Families are likely to be impacted by fuel poverty – an estimated 7,000 families are fuel poor. Outcomes to reduce fuel poverty are likely to positively impact on this group, however local research could be undertaken to understand the uptake of fuel poverty measures by client group.

### **Rural Areas**

People living in rural areas will be positively impacted by outcomes to improve the energy efficiency of their homes.

<b>Evidence used</b>	<b>Source of evidence</b>
EEPS:ABS investment programmes	Fife Council
Scottish Index of Multiple Deprivation (SIMD)	Knowfife dataset
<b>Evidence gaps</b>	<b>Planned action to address evidence gaps</b>
Impact of investment in home energy by equality strand and household profiles	Healthy Heating and Poverty Partnership to consider and develop actions
Poverty issues by equality strand and household profile	Healthy Heating and Poverty Partnership to consider and develop actions

## Recommendations and Sign Off

Recommendation	Lead	Timescale
1. Regular reporting of equalities profiling of homelessness and housing allocations against the general population equalities profile	Fife PSP/Fife Housing Register Partnership	All to be considered and taken forward through LHS by latest 30 <sup>th</sup> June 2022.
2. Reporting of the profile of households allocated new build homes against FHR waiting list and general population equalities profile	Fife Housing Register Partnership	
3. Regular reporting of client groups receiving support and adaptations services against the general population equalities profile	Health and Social Care Partnership	
4. Establish equality reporting within Scheme of Assistance. 4. Establish mechanisms for reporting on issues relating to equality within private renting by those living within the sector.	PSHIG	
5. Establish mechanisms for reporting how investment in home energy is impacting on equality strands. 5. Regular reporting of the uptake of fuel poverty and housing poverty improvement measures by equality strand against the general population equalities profile	Healthy Heating and Poverty Partnership	

## Sign off

(By signing off the EqIA, you are agreeing that the EqIA represents a thorough and proportionate analysis of the policy based on available evidence, there is no indication of unlawful practice and the recommendations are proportionate and will be delivered.

Date completed: 05/09/2022	Date sent to Equalities Unit: <a href="mailto:Enquiry.equalities@fife.gov.uk">Enquiry.equalities@fife.gov.uk</a>
Senior Officer: John Mills for Fife Housing Partnership	Designation: Head of Housing Services

FOR EQUALITIES UNIT ONLY

EqIA Ref No.	
Date checked and initials	