

INTEGRATED IMPACT ASSESSMENT COVERING

- **EQUALITIES & SOCIO ECONOMIC DUTIES**
- **HUMAN RIGHTS AND RIGHTS OF THE CHILD**

STAGE 1 - DO I NEED AN INTEGRATED IMPACT ASSESSMENT?

Name of policy or proposal: Reduction in allocated budget to managing Gypsy/Traveller encampments (C2-1)	
Is this a	Mark X below
New activity, programme or policy?	
Change to an existing activity, programme or policy?	
Budget proposal?	X

Duties: tick the boxes you think apply	No	Maybe	Yes
Equalities: Will your proposal have an impact on groups with protected characteristics? <i>Consider the impact of your proposal on people and how they access your services and information without barriers.</i>			X
Socio-economic <i>Not every person/family has access to regular income or savings. Will your proposal have an adverse impact on them</i>			X
Does your proposal impact on the human rights of people?			X
Does your proposal impact on the rights of children and young people			X

Reasoning

Briefly describe your reasoning for the responses given above:

Gypsy Travellers are a recognised ethnic group which comes under the protected characteristic of race. It is unlawful to discriminate against Gypsy/Travellers on the basis

of their ethnic origin. Providing co-ordinated advice and support to individuals on unauthorised encampments through sign posting and partnership working has a positive effect on promoting good relations, eliminating discrimination, victimisation and harassment, as well as promoting equality of opportunity.

If you have answered “maybe” or “yes” to any of the Stage 1 questions above then proceed to complete the Stage 2 Integrated Impact Assessment questions below.

If you have answered “no” to the Stage 1 questions above then provide the details below and submit to [email]

Lead Officer for developing the contract	
Other people involved in the screening (this may be council staff, partners or others i.e. contractor or community)	
Date	

STAGE 2: INTEGRATED IMPACT ASSESSMENT

Brief description of the affected service

1. Describe what the service does:

Moray Council is the lead agency in the management of unauthorised Gypsy/Traveller encampments within its geographical area. An unauthorised encampment is where a Gypsy/Traveller family or group of families choose to stop and stay for a number of days on an encampment (or piece of land) which is not approved for that purpose and which does not have the permission of the land owner. The encampment will generally have no access to any facilities. Unauthorised encampments fall into two main categories: those on land owned by the local authorities (highways, schools, public car parks etc.), and those on privately owned land. Moray Council liaises with other services/agencies/landowners in dealing with these encampments.

2. Who are your main stakeholders?

Gypsy Travellers

Police Scotland

NHS Grampian

Moray Council Departments (Education/Housing/Social Work/Waste/Legal Services)

Landowners

Local settled community

Unauthorised Encampment Officer

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

Option 1 – Unauthorised Encampment Resource reduced from 0.5FTE to 0.25FTE with the additional hours for the substantive postholder funded by the HRA to undertake estate caretaker duties. This would be sufficient to attend and manage unauthorised encampments in typical years.

Option 2 – service cessation, withdrawing the Council provision for managing Gypsy/Traveller encampments.

4. How will this affect your customers?

Option 1 – In typical years customers are unlikely to be impacted. However, should multiple/large/lengthy encampments arise it would lead to a reduced level of service.

Unauthorised encampment are currently visited within 1 working day (2 working days if located in a rural area) of being made aware of it but this response time may increase. The Unauthorised Encampment Officer currently visits encampments at least twice per week although depending on the nature of the encampment, more frequent visits may be carried out. There would no longer be the capacity for this during busy periods and this would lead to a reduced level of support and assistance being provided.

Option 2 – It is already recognised that Gypsy/Travellers experience poorer outcomes in relation to education, health and wellbeing and inclusion/engagement. Gypsy/Travellers face many challenges and barriers to accessing services. Withdrawing the Council provision for managing Gypsy/Traveller encampments would exacerbate this position and potentially lead to conflict with members of the settled community.

5. Impact on staff providing the service

The duties of the Unauthorised Encampment Officer will be revised with a greater proportion of hours directed to housing estate work and paid for by the Housing Revenue Account.

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

Protected groups	Potential impacts and considerations
Race	Unauthorised encampments can lead to hostility between Gypsy/Travellers and the settled community. Negative stereotypes can exist within the community. Regular visits by the Unauthorised Encampment Officer and the Police can help alleviate tensions/negativity. A reduction or cessation in the management of unauthorised encampments could lead to increased tensions between Gypsy/Travellers and the settled community.
Disability	There is evidence highlighting the poor health of Gypsy/Travellers compared to the wider population, even when compared with other socially deprived/excluded groups/other minority ethnic groups. People with a disability will be negatively impacted from being in an unauthorised encampment. They may also struggle to access health services and this may be exacerbated if they don't have access to support and assistance from the Unauthorised Encampment Officer.
Carers (for elderly, disabled or minors)	
Sex	N/a
Pregnancy and maternity (including breastfeeding)	Gypsy/Traveller communities can experience barriers accessing healthcare which can include limited ability to register with a GP. Being pregnant

	whilst in an unauthorised encampment and out with settled accommodation can negatively impact pregnant women. Access to pre or post-natal care may be limited and they will not be able to receive the consistent care which being in a settled environment would provide. A reduction or cessation in the management of unauthorised encampments could lead to negative outcomes during pregnancy and maternity due to a lack of signposting to services.
Sexual orientation	N/a
Age (include children, young people, midlife and older people)	Older and younger people may be negatively impacted staying in an unauthorised encampment as access to services such as health care and education may be limited, however the council's policy management of unauthorised encampments helps to build relationships and encourage people to access suitable services. A reduction or cessation in the management of unauthorised encampments could lead to negative outcomes for older and young people due to this proposal.
Religion, and or belief	N/a
Gender reassignment	N/a
Inequalities arising from socio-economic differences	It is widely recognised people from a Gypsy/Traveller ethnic group have little to no income. Their nomadic way of life means they will find it harder to access health services and education than the settled community. The unauthorised encampment officer is in place to help facilitate these basic needs and if the service is reduced or ceased this will have a negative impact.

Human rights

List of convention rights	Describe, where applicable, if and how specific rights are engaged
Article 5: Right to liberty and security	
Article 6: Right to a fair trial	
Article 8: Right to respect for private and family life, correspondence and the home	Dealing with unauthorised encampments means ensuring that careful consideration must be given to ensure that their right to their home is not unlawfully interfered with.
<i>Article 10: Freedom of expression</i>	
<i>Article 11: Freedom of assembly and association</i>	
<i>Article 12: Right to marry</i>	

List of convention rights	Describe, where applicable, if and how specific rights are engaged
<i>Article 14: Prohibition of discrimination (in relation to the convention rights)</i>	
<i>Article 1 of Protocol 1: Protection of property</i>	
<i>Article 2 of Protocol 1: Right to education</i>	The unauthorised encampment officer liaises between Gypsy.Travellers and Education to ensure that the children have access to education.
<i>Article 3 of Protocol 1: Right to free elections by secret ballot</i>	

Children's Rights and Wellbeing

Relevant articles – UNCRC	
Article 2 – Non discrimination	
Article 12 – Respect of the views of the child	
Article 3.1 – Best interest of the child	When dealing with unauthorised encampments, the officer has to consider the best interests of the child in relation to access to healthcare and education.
Article 6.2 – Right to survival and development	

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

Performance data				
Internal consultation	Discussions have taken place with the Unauthorised Encampment Officer and Education Department.			
Consultation with affected groups				
Local statistics		2020/21	2021/22	2022/23
	No. of new unauthorised encampments	17	12	12
	No. of encampments ended	17	13	11
	Average duration of encampments ended (days)	35	37	34

National statistics	
Other	

8. Evidence gaps

Do you need additional information in order to complete the information in the previous questions?

Option 1 - in typical years, it is likely to have an insignificant impact on the service provided to manage unauthorised encampments.

Option 2 - if a decision is taken to move on Option 2, it is recommended that consultation takes place with representatives of the Gypsy/Traveller community and the main stakeholders listed above.

9. Mitigating action

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

Another agency could potentially take over the role of managing unauthorised encampments. This would only be necessary if Option 2 is adopted.

10. 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?

Reducing the allocated budget to managing Gypsy/Traveller encampments is a proportionate means to achieving a legitimate aim of balancing the Council's budget.

SECTION 3 CONCLUDING THE IIA

Concluding the IIA

1. No potential negative impacts on any of the protected groups were found.	
2. Some potential negative impacts have been identified. The impacts relate to:	
Reducing discrimination, harassment, victimisation or other conduct prohibited under the Equality Act 2010	X
Promoting equality of opportunity	X
Fostering good relations	X
3. The proposals interfere with human rights and/or the rights of the child	X
4. Negative impacts can be mitigated the proposals as outlined in question 8	
5. The negative impacts cannot be fully mitigated but are justified as outlined in question 9.	
6. Further consultation with affected groups is needed.	X
7. It is advised not to go ahead with the proposals.	

Decision

Set out the rationale for deciding whether or not to proceed with the proposed actions:

Date of Decision:

Sign off and authorisation:

Service	Housing & Property
Department	Environmental Services
Policy/activity subject to IIA	Budget saving C2-1 - Reduction in allocated budget to managing Gypsy/Traveller encampments
We have completed the integrated impact assessment for this policy/activity.	Name: David Munro Position: Housing Services Manager Date: 6.10.23
Authorisation by head of service	Name: Position: Date:
Permission to publish on website -	
Please return this form to the Equal Opportunities Officer, Chief Executive's Office.	