

## 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: Rent Setting Policy Review	
Is this a	Mark X below
New activity, programme or policy?	
Change to an existing activity, programme or policy?	X
Budget proposal?	

Duties: tick the boxes you think apply	No	Maybe	Yes
<b>Equalities:</b> 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>	✓		
<b>Socio-economic</b>  <i>Not every person/family has access to regular income or savings. Will your proposal have an adverse impact on them</i>		✓	
Does your proposal impact on the <b>human rights</b> of people?	✓		
Does your proposal impact on the <b>rights of children</b> and young people	✓		

#### Reasoning

The review of the Rent Setting Policy aims to ensure that the revised rent structure offers increased consistency and is more transparent and easier to understand for all tenants and that the income generated ensures that the Housing Revenue Account remains financially viable. The revised structure will mean that some tenants will experience an increase in rent, some will have a decrease and others will have no change. To mitigate

any impact which tenants may experience and to ensure that the rent continues to be affordable, the Service will implement transitional arrangements whereby the maximum rent increase or decrease will be restricted to £7.50 per week, until such a time as the rent is equivalent the full amount.

As part of the review process, initial consultations have been undertaken with tenants. This feedback has been used to inform the process and develop the methodology used in setting council house rent. There will be further consultation on the draft policy with stakeholders, if Committee provide approval. The Service has benchmarked the proposed rents with local housing providers and benefit rates to ensure that they remain affordable. Moray Council currently has the lowest social housing rents in Scotland.

**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:

The Rent Setting Policy sets out the methodology used for setting Moray Council house rents.

2. Who are your main stakeholders?

- Moray Council tenants
- Moray Council Housing Staff in delivering the policy

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

The change will provide a consistent, fair and transparent model of setting rent and service charges which ensures that rents continue to be affordable to tenants whilst generating income to support investment and provide financial security to the Housing Revenue Account Business Plan.

4. How will this affect your customers?

As a result of the policy change, some tenants may experience an increase in rent, some will experience a decrease in rent and for some there will be no change. The revised policy and methodology applied will mean that there is greater consistency amongst the rent levels that tenants are charged. The process will be easier for both tenants and staff to understand and explain.

5. Impact on staff providing the service

An implementation plan will be developed. No additional staffing resource will be required to implement the policy change. Where appropriate, training and guidance will be provided. Overall, the process will provide transparency and accountability and will make it easier for staff to understand and to explain to tenants.

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

Protected groups	Potential impacts and considerations
Race	Gypsy / Travellers and non-UK nationals. Information resources explain the policy and the structure using plain language and will be available in accessible formats. Interpretation for British Sign Language users or non-English speakers can be provided on request.
Disability	Information resources explain the policy and the structure using plain language and will be available in accessible formats. Interpretation for British Sign Language users or non-English speakers can be provided on request.
Carers (for elderly, disabled or minors)	
Sex	
Pregnancy and maternity (including breastfeeding)	
Sexual orientation	
Age (include children, young people, midlife and older people)	
Religion, and or belief	
Gender reassignment	
Inequalities arising from socio-economic differences	Transitional arrangements will be implemented to mitigate any impact. This means that the maximum rent increase or decrease would be restricted to

	£5 per week until such time as the rent convergence is implemented in full.
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### Human rights

List of convention rights	Describe, where applicable, if and how specific rights are engaged
Article 5: Right to liberty and security	No specific impacts identified.
Article 6: Right to a fair trial	No specific impacts identified.
Article 8: Right to respect for private and family life, correspondence and the home	No specific impacts identified.
<i>Article 10: Freedom of expression</i>	No specific impacts identified.
<i>Article 11: Freedom of assembly and association</i>	No specific impacts identified.
<i>Article 12: Right to marry</i>	No specific impacts identified.
<i>Article 14: Prohibition of discrimination (in relation to the convention rights)</i>	No specific impacts identified.
<i>Article 1 of Protocol 1: Protection of property</i>	No specific impacts identified.
<i>Article 2 of Protocol 1: Right to education</i>	No specific impacts identified.
<i>Article 3 of Protocol 1: Right to free elections by secret ballot</i>	No specific impacts identified.

### Children's Rights and Wellbeing

Relevant articles – UNCRC	
Article 2 – Non discrimination	Not applicable
Article 12 – Respect of the views of the child	Not applicable
Article 3.1 – Best interest of the child	Not applicable
Article 6.2 – Right to survival and development	Not applicable

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

<b>Performance data</b>	
<b>Internal consultation</b>	This will be undertaken with relevant staff as part of the Committee process.
<b>Consultation with affected groups</b>	Initial consultation, facilitated by independent consultants, has taken place with tenants as part of the policy review and development process. This included online survey and face to face workshops to gauge tenant opinions. If Committee approval is given, a formal consultation will take place with stakeholders. Feedback received will be considered prior to a revised policy being presented to the Housing and Community Safety Committee for approval.
<b>Local statistics</b>	Comparison with local landlord rent levels.
<b>National statistics</b>	Comparison with other landlord rent levels.
<b>Other</b>	Other landlord practice.

### 8. Evidence gaps

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

No

### 9. Mitigating action

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

No negative impact have been identified. The policy implementation plan has already identified measures which will address any potential mitigating impacts.

### 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?

No negative impact have been identified.

## 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	
Promoting equality of opportunity	
Fostering good relations	
3. The proposals interfere with human rights and/or the rights of the child	
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.	
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:  
The proposals set out a process for revising the rent setting structure to ensure that it is fairer, consistent and provides increased transparency and will be easier for tenants to comprehend. Any mitigating factors have been taken into account as part of the policy review and development process and arrangements are in place to counteract those identified

**Date of Decision:** 18.10.23

**Sign off and authorisation:**

<b>Service</b>	Economy, Environment & Finance
<b>Department</b>	Housing and Property
<b>Policy/activity subject to IIA</b>	Rent Setting Policy
We have completed the integrated impact assessment for this policy/activity.	Name: Gillian Henly Position: Senior Housing Officer (Policy) Date: 18/10/23
Authorisation by head of service	Name: Edward Thomas Position: Head of Housing and Property Date:
Permission to publish on website -	
Please return this form to the Equal Opportunities Officer, Chief Executive's Office.	