

The purpose of an Integrated Impact Assessment is to evidence that Aberdeen City Council is meeting its legislative duties by assessing the potential impacts of its policies and decisions on different groups of people and the environment. The legislation considered within this assessment is:

- Section 2 [Equality Act 2010 protected characteristics](#)
- Section 3 [Socio-Economic](#)
- Section 4 [Consumer Duty](#)
- Section 5 [Human Rights](#)
- Section 6 [Children and Young People’s Rights](#)
- Section 7 [Environmental impacts](#)

The term ‘policy’ is used throughout this document and applies to policies, proposals, strategies, provision, criteria, functions, practice, budget savings and activities that includes delivery of our services.

## 1. About the Policy

<b>1.1 Title</b>
Strategic Housing Investment Plan
<b>1.2 What does this policy seek to achieve?</b>
The core purpose of the Strategic Housing Investment Plan is to set out strategic investment priorities for affordable housing over a 5-year period to achieve the outcomes set out in the Local Housing Strategy (LHS). The Strategic Housing Investment Plan reinforces the local authority as the strategic housing authority and details how investment priorities will be delivered.
The SHIP should:
<ul style="list-style-type: none"> <li>• Set out the investment priorities for affordable housing</li> <li>• Demonstrate how these will be delivered</li> <li>• Identify the resources required to deliver these priorities</li> <li>• Enable the involvement of key partners.</li> </ul>
<b>1.3 Is this a strategic programme/proposal/decision?</b>
The SHIP is a strategic programme that sets out investment priorities for affordable housing over a 5-year period. The SHIP is aligned with the strategic outcomes of the Local Housing Strategy, with the delivery of affordable housing through the SHIP contributing to the achievement of these outcomes.
<b>1.4 Is this a new or existing policy?</b>
This is an existing policy and a refresh of the SHIP 2024/25-2028/29.
<b>1.5 Is this report going to a committee?</b>
Yes
<b>1.6 Committee name and date:</b>
Communities, Housing and Public Protection
21 November 2024

**1.7 Report no and / or Budget proposal number and / or Business Case reference number:**

F&amp;C/24/320

**1.8 Function and Cluster:**

Families and Communities - Housing

## Impacts

Aberdeen City Council has a legal requirement as a public sector organisation to assess the impact of its work on equality groups and assess against human rights, children’s rights and our socio-economic duty. This is our Public Sector Equality Duty (PSED). The PSED has three key parts:

- Eliminate unlawful discrimination, harassment, victimisation or any other prohibited conduct.
- Advance equality of opportunity.
- Foster good relations by tackling prejudice, promoting understanding.

This following five sections in the Integrated Impact Assessment demonstrate that these considerations that have been made in the policy, that the impact of proposals made is understood and accepted, and what mitigating steps can be taken to reduce any negative impact of the policy.

## 2: Equality Act 2010 - Protected Characteristics

Aberdeen City Council wants to ensure everyone is treated fairly. This section identifies what impact the policy may have on people with [protected characteristics](#).

### 2.1 What impact could this policy have on any of the below groups?

Protected Characteristic	Negative			Neutral	Positive
	High	Medium	Low		
<a href="#">Age</a>					✓
<a href="#">Disability</a>					✓
<a href="#">Gender Reassignment</a>				✓	
<a href="#">Marriage and Civil Partnership</a>				✓	
<a href="#">Pregnancy and Maternity</a>				✓	
<a href="#">Race</a>				✓	
<a href="#">Religion or Belief</a>				✓	
<a href="#">Sex</a>				✓	
<a href="#">Sexual Orientation</a>				✓	

### 2.2 In what way will the policy impact people with these protected characteristics?

The Strategic Housing Investment Plan will have a neutral impact on all protected characteristics as affordable housing is allocated based solely on housing need, in alignment with the council’s Allocations Policy for social housing, except for disability and age where it will have a positive impact. It will have a positive impact as the Strategic Housing Investment Plan seeks to provide specialist provision accommodation for people with particular needs. It also has a minimum 15% target for all social housing developments to provide wheelchair accessible homes.

In the allocation of affordable housing, the council will ensure that no applicant is discriminated against on the grounds of the above protected characteristics, in accordance with the Equality Act 2010.

## 2.3 What considerations have been made in reaching the above assessment?

### What internal or external data has been considered? What does this data tell us?

Data is collated in relation to households who require wheelchair accessible homes and consistently tells us there is a requirement for around 50-60 households. This figure remains consistent despite wheelchair accessible homes being provided each year.

There is an ageing population and demand for wheelchair accessible homes is predicted to continue.

Demand for specialist provision homes is provided through Market Position Statements produced by Aberdeen City Health and Social Care Partnership. This tells us there is an ongoing requirement for specialist provision homes which the Strategic Housing investment Plan seeks to provide.

### What consultation and engagement has been undertaken with officers and partner organisations?

Aberdeen City Council, with the involvement of its key partners via the SHIP Working Group has prepared the SHIP submission. The SHIP Working Group is the council's key working group that is responsible for development of the SHIP and the ongoing review of new and current projects through collaboration with Scottish Government via quarterly meetings. The SHIP Working Group consists of several registered social landlords who operate in the city. The impact on those with protected characteristics was considered during the development of the SHIP and a neutral impact was identified.

### What consultation and engagement has been undertaken with people who may be impacted by this policy?

No external consultation and engagement with people who may be impacted by this policy has taken place but the Strategic Housing Investment Plan forms a key part of the Local Housing Strategy which is consulted on. The current Local Housing Strategy is being refreshed and will be consulted on.

## 2.4 What mitigations can be put in place?

### What can be done to remove or reduce any negative impacts of this policy (if applicable)?

Not applicable.

### With mitigations in place, what is the new overall rating of the negative impact(s)?

High	
Medium	
Low	
Negative Impact Removed	

## 3: Socio-Economic Impacts

Aberdeen City Council has a duty to reduce the inequalities of outcome that can arise from socio-economic disadvantage. This section is used to consider what impact the policy may have on people experiencing socio-economic disadvantage – and how any inequalities of outcome arising from the policy can be reduced.

Use this guide to understand more on socio-economic inequalities: [The Fairer Scotland Duty: Guidance for Public Bodies \(www.gov.scot\)](http://www.gov.scot)

### 3.1 What impact could this policy have on people who experience the following aspects of socio-economic disadvantage?

	Negative	Neutral	Positive
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<b>Low income</b> – those who have insufficient earnings to meet basic needs, such as food, clothing, housing, or utilities.			✓
<b>Low/ no wealth</b> – those who have no savings for unexpected spend or provision for the future.			✓
<b>Material deprivation</b> – those who cannot afford or access goods or services that are considered essential or desirable for a decent quality of life, such as food, clothing, heating, transport, internet, cultural, recreational and social activities.			✓
<b>Area deprivation</b> – those who live in an area with poor living conditions, such as higher levels of crime, pollution, noise, congestion, or lack of infrastructure, amenities, or green spaces.			✓
<b>Socio-economic background</b> – social class, parents’ education, employment, income.			✓

### 3.2 In what way will the policy impact people experiencing socio-economic disadvantage?

There is the potential that the Strategic Housing Investment Plan could have a positive impact in relation to people who experience the following aspects of socio-economic disadvantage.

#### Low income

The provision of affordable housing has a positive impact on disposable income; the less you pay on housing, the more money you have left to pay for other essentials.

#### Low/No wealth

The provision of affordable housing has a positive impact on disposable income; the less you pay on housing, the more money you have left to save.

#### Material deprivation

The provision of affordable housing has a positive impact on disposable income; the less you pay on housing, the more money you have left to pay for other essentials and desirable goods and services.

#### Area deprivation

New, good quality affordable housing has the potential to improve the amenity of local areas as well as potentially making entering the housing market more accessible.

#### Socio-economic background

The provision of affordable housing can have a positive impact on socio-economic background by providing a viable housing option to those on lower incomes.

### 3.3 What considerations have been made in reaching the above assessment?

#### **What internal or external data has been considered? What does this data tell us?**

Low cost homeownership is one type of affordable housing. The prioritisation criteria and sales process for affordable housing is clearly defined on the Aberdeen City Council website -

<https://www.aberdeencity.gov.uk/services/housing/find-home/advice-house-buying/low-cost-home-ownership>. By following this process, staff ensure that there is no detrimental impact to applicants in relation to discrimination, socio-economic background or Human Rights.

#### **What consultation and engagement has been undertaken with officers and partner organisations?**

Aberdeen City Council, with the involvement of its key partners via the Strategic Housing Investment Plan Working Group has prepared the Strategic Housing Investment Plan submission. The Strategic Housing Investment Plan Working Group is the council’s key working group that is responsible for development of the Strategic Housing Investment Plan and the ongoing review of new and current projects through collaboration with Scottish Government via quarterly meetings. The Strategic Housing Investment Plan Working Group consists of all registered social landlords who operate in the city.

The impact on those experiencing socio-economic disadvantage was considered during the development of the Strategic Housing Investment Plan and it was identified that there is the potential for a positive impact on those currently living in poor housing conditions and those from disadvantaged socio-economic backgrounds.

**What consultation and engagement has been undertaken with people who may be impacted by this policy?**

No external consultation and engagement with people who may be impacted by this policy has taken place but the Strategic Housing Investment Plan forms a key part of the Local Housing Strategy which is consulted on. The current Local Housing Strategy is being refreshed and will be consulted on.

3.4 What mitigations can be put in place?

**What can be done to remove or reduce any negative impacts of this policy (if applicable)?**

Not applicable.

**If mitigations are in place, does this remove or reduce the negative impact?**

No – negative impact remains

Yes – negative impact reduced

Yes - negative impact removed

**4: Consumer Impacts**

The Consumer Scotland Act 2020 places a Consumer Duty on the public sector to put consumer interests at the heart of strategic decision-making, emphasising the need for accessible and affordable public services, especially during times of financial pressure. This person-centred approach is intended to result in better quality services and outcomes for the public as consumers of public services across Scotland.

This section of the IIA is used to consider the impact of the policy on consumers of any services that the policy is intended to change.

Use this guide to understand more on the consumer duty: [How to meet the consumer duty: guidance for public authorities](#)

4.1 What impact could this policy have on any of the below consumer groups?

	Negative	Neutral	Positive
<b>Individuals</b>			✓
<b>Small businesses</b>		✓	

4.2 In what way will the policy impact people in these consumer groups?

The Strategic Housing Investment Plan will have a positive impact on consumers of public services through the provision of good quality, accessible and affordable homes for those on lower incomes or who have had an unexpected change of circumstances.

4.3 What mitigations can be put in place?

**What can be done to remove or reduce any negative impacts of this policy (if applicable)?**

Not applicable.

**If mitigations are in place, does this remove or reduce the negative impact?**

No – negative impact remains

Yes – negative impact reduced

Yes - negative impact removed

## 5: Human Rights Impacts

The Human Rights Act 1998 sets out the fundamental rights and freedoms that everyone in the UK is entitled to. It incorporates the rights set out in the European Convention on Human Rights (ECHR) into domestic British law. The Human Rights Act came into force in the UK in October 2000

The Act sets out our human rights in a series of 'Articles'. Each Article deals with a different right.

Use this guide to understand more about [Human Rights](#).

### 5.1 What impact could this policy have on Human Rights?

Human Rights Article	Negative	Neutral	Positive
Article 2: <a href="#">Right to life</a>		✓	
Article 4: <a href="#">Prohibition of slavery and forced labour</a>		✓	
Article 5: <a href="#">Right to liberty and security</a>		✓	
Article 6: <a href="#">Right to a fair trial</a>		✓	
Article 7: <a href="#">No punishment without law</a>		✓	
Article 8: <a href="#">Right to respect for private and family life, home and correspondence</a>		✓	
Article 9: <a href="#">Freedom of thought, belief and religion</a>		✓	
Article 10: <a href="#">Freedom of expression</a>		✓	
Article 11: <a href="#">Freedom of assembly and association</a>		✓	
Article 12: <a href="#">Right to marry and start a family</a>		✓	
Article 14: <a href="#">Protection from discrimination in respect of these rights and freedoms</a>		✓	
Article 1 of Protocol 1: <a href="#">Right to peaceful enjoyment of your property</a>		✓	
Article 2 of Protocol 1: <a href="#">Right to education</a>		✓	
Article 3 of Protocol 1: <a href="#">Right to participate in free elections</a>		✓	

### 5.2 In what way will the policy impact Human Rights?

The Strategic Housing Investment Plan will have a neutral impact on Human Rights as the process of allocating affordable housing does not affect the rights and freedoms defined in the ECHR. Affordable housing is allocated based on housing need and applicants will not be discriminated against or have their rights contravened during this process.

### 5.3 What mitigations can be put in place?

What can be done to remove or reduce any negative impacts of this policy (if applicable)?	
Not applicable.	
If mitigations are in place, does this remove or reduce the negative impact?	No – negative impact remains
	Yes – negative impact reduced
	Yes - negative impact removed

## 6: Children and Young People's Rights Impacts

The United Nations Convention has 54 articles that cover all aspects of a child's life and set out the civil, political, economic, social and cultural rights that all children everywhere are entitled to. It also explains how adults and governments must work together to make sure all children can enjoy all their rights.

Children’s rights apply to every child/young person under the age of 18 and to adults still eligible to receive a “children’s service” e.g. care leavers aged 18-26 years old.

You can [read the full UN Convention \(pdf\)](#), or [just a summary \(pdf\)](#), to find out more about the rights that are included.

### 6.1 What impact could this policy have on the rights of Children and Young People?

	Negative	Neutral	Positive
<b>PROVISION</b>			
Article 2: non-discrimination		✓	
Article 3: best interests of the child provision and protection		✓	
Article 5: parental guidance and a child's evolving capacities		✓	
Article 16: right to privacy		✓	
Article 17: access to information from the media		✓	
Article 18: parental responsibilities and state assistance		✓	
Article 22: refugee children		✓	
Article 23: children with a disability		✓	
Article 24: health and health services		✓	
Article 26: social security		✓	
Article 27: adequate standard of living		✓	
Article 28: right to education		✓	
Article 29: goals of education		✓	
Article 30: children from minority or indigenous groups		✓	
Article 31: leisure, play and culture		✓	
Article 39: recovery from trauma and reintegration		✓	
Article 40: juvenile justice		✓	
<b>PROTECTION</b>			
Article 6: life, survival and development		✓	
Article 7: birth registration, name, nationality, care		✓	
Article 8: protection and preservation of identity		✓	
Article 9: Separation from parents		✓	
Article 10: family reunification protection		✓	
Article 11: abduction and non-return of children		✓	
Article 15: freedom of association		✓	
Article 19: protection from violence, abuse and neglect		✓	
Article 20: children unable to live with their family		✓	
Article 21: adoption		✓	
Article 25: review of treatment in care		✓	
Article 33: drug abuse		✓	
Article 34: sexual exploitation		✓	
Article 35: abduction, sale and trafficking		✓	
Article 36: other forms of exploitation		✓	
Article 37: inhumane treatment and detention		✓	
Article 38: war and armed conflicts		✓	
Article 32: child labour		✓	
<b>PARTICIPATION</b>			
Article 12: respect for the views of the child		✓	
Article 13: freedom of expression		✓	
Article 14: freedom of thought, belief and religion		✓	
Article 42: knowledge of rights		✓	

## 6.2 In what way will the policy impact the rights of Children and Young People?

The Strategic Housing Investment Plan will have a neutral impact on the rights of Children and Young People as the prioritisation criteria and sales process for affordable housing does not contravene the rights, freedoms or protection of these groups as defined in the UNCRC.

Staff ensure that there is no detrimental impact to applicants in relation to discrimination, socio-economic background or Human Rights.

## 6.3 What mitigations can be put in place?

**What can be done to remove or reduce any negative impacts of this policy (if applicable)?**

Not applicable.

**If mitigations are in place, does this remove or reduce the negative impact?**

**No – negative impact remains**

**Yes – negative impact reduced**

**Yes - negative impact removed**

## 7: Environmental Impacts

Aberdeen City Council has a duty to meet its legal environmental responsibilities by working towards Net Zero emissions, adapting to climate change, and acting in a way it considers most sustainable. We must also fulfil the [biodiversity duty](#) and [sustainable procurement duty](#).

This section in the Integrated Impact Assessment demonstrates that these considerations that have been made in the policy, that the impact of proposals made is understood and accepted, and what mitigating steps can be taken to reduce any negative impact of the policy.

Use this guide to understand more on the legal climate change duty: [Climate change - gov.scot \(www.gov.scot\)](#) and find out more about how Aberdeen is adapting to Climate Change: [Aberdeen Adapts | Aberdeen City Council](#)

### 7.1 What is the impact of this policy on any of the below climate, environmental and waste considerations?

	Negative	Neutral	Positive
<a href="#">Council or City-wide carbon emissions</a>			✓
<a href="#">Active and sustainable travel</a>		✓	
<a href="#">Facilities for local living</a>			✓
<a href="#">Resilience and adaptability</a> to flooding and weather events		✓	
<a href="#">Biodiversity improvement</a> and <a href="#">wildlife/habitat connectivity</a>		✓	
Water consumption and drainage		✓	
Pollution (air, water, noise, light and land contamination)		✓	
Impact on resource use and <a href="#">waste</a>		✓	
<a href="#">Sustainable procurement</a> of goods and services		✓	

### 7.2 In what way will the policy impact the environment?

The Strategic Housing Investment Plan has the potential to have a positive impact on carbon emissions in the city due to the provision of new affordable housing which is built to a high energy efficiency standard. The provision of accessible, affordable and good quality homes in the city also potentially has a positive impact on facilities for local living. All other impacts on climate, environmental and waste

considerations are likely to be neutral. The Strategic Housing Investment Plan has the potential to positively contribute the council's Net Zero Routemap.

7.3 What considerations have been made in reaching the above assessment?

**What internal or external data has been considered? What does this data tell us?**

Information given by developers of affordable housing in relation to the energy efficiency of the properties.

**What consultation and engagement has been undertaken with local groups, partner organisations, experts etc? Where required, identify any other environmental assessments that have been completed.**

No external consultation and engagement with people who may be impacted by this policy has taken place but the Strategic Housing Investment Plan forms a key part of the Local Housing Strategy which is consulted on. The current Local Housing Strategy is being refreshed and will be consulted on.

7.4 What mitigations can be put in place?

**What can be done to remove or reduce any negative impacts of this policy (if applicable)?**

Not applicable.

**If mitigations are in place, does this remove or reduce the negative impact?**

**No – negative impact remains**

**Yes – negative impact reduced**

**Yes - negative impact removed**

## 8: Sign Off

<b>Any further positive or negative impacts on individuals or groups that have been considered?</b>
No further impacts identified.
<b>Does the policy relate to the Council's <a href="#">Equality Outcomes</a>? If yes, how.</b>
The Strategic Housing Investment Plan has the potential to contribute to Equality Outcome 1 - All people with protected characteristics will access information, goods and services knowing that social and physical barriers are identified and removed, with a focus on Age, Gender reassignment and Disability. The Strategic Housing Investment Plan contributes to this outcome by ensuring those with protected characteristics are not discriminated against during the allocation of affordable housing.
<b>Overall summary of changes made to the policy as a result of impact assessment.</b>
No changes made as a result of this impact assessment.
<b>Outline how the impact of policy will be monitored.</b>
The Strategic Housing Investment Plan is reviewed and updated on an annual basis and this will include monitoring whether there have been any changes to its impact on the groups outlined in this IIA.
<b>If there are any remaining negative impacts after mitigation, what is the justification for why this policy should proceed.</b>
Not applicable.

<b>Assessment Author</b>	Thomas Cairns/Mel Booth
<b>Date</b>	13 November 2024
<b>Chief Officer</b>	Jacqui McKenzie
<b>Date</b>	20 November 2024