

## EQUALITY IMPACT ASSESSMENT - RESULTS

<p><b>Title of Policy</b></p>	<p>MMR Invitation - successful proposal - Places for People (PfP): Mid-market rent proposal</p>
<p><b>Summary of aims and desired outcomes of Policy</b></p>	<p>Scottish Ministers are committed to increasing housing supply across all tenures, helping to deliver good quality housing that meets tenants and homeowners needs, as well as helping to boost economic growth.</p> <p>This project aligns with Scottish Government (SG) housing policy and in particular, the support of mid-market rent (MMR) housing in Scotland. Through the MMR invitation - PfP will allow delivery of a pipeline of 1,000 new homes for mid-market rent by March 2021.</p>
<p><b>Directorate: Division: team</b></p>	<p>More Homes Division, Housing and Social Justice Directorate.</p>

### Executive summary

As part of the More Homes Scotland approach, launched on 29 February 2016, and to contribute to the target to deliver at least 50,000 more affordable homes by 2021, SG announced that it would invite prospective MMR providers to submit proposals as a means of expanding MMR housing.

The MMR Invitation is an innovative approach to the provision of affordable housing that builds on the success and lessons learned from previous initiatives such as the National Housing Trust (NHT) and the Local Affordable Rented (LAR) Housing Trust.

The MMR invitation was open to all potential private sector housing providers to put forward credible value-for-money proposals that could deliver MMR at scale (500-1000 units), draw in significant private investment and be counted towards the non-social element of 50,000 homes target. Places for People (PfP) – the single largest provider of mid-market rent in Scotland – successfully completed an assessment process and due diligence to secure SG loan funding which will allow delivery of a pipeline of 1,000 new homes for mid-market rent by March 2021. These will be available to qualifying tenants at affordable rents and will make an important contribution towards the SG's affordable housing target.

## **Background**

MMR is a subset of 'affordable housing'. The Scottish Government supports a range of affordable housing initiatives including grant-funded MMR, NHT and its variants - which are supported by a Scottish Government guarantee - and LAR; through the Affordable Housing Supply Programme. Over the current Parliamentary term, planned spending on affordable housing will be £3 billion and the target is 50,000 homes

MMR plays an important role in the overall housing mix of communities, providing a key route to accessing housing for those for whom the private rent sector is expensive, but who are also unlikely to be able to access either social rented housing or owner occupation. By ensuring provision of housing initiatives across all tenures, the Scottish Government supports a more balanced housing market which is able to respond to the range of need and demand across Scotland.

## The Scope of the EQIA

In the drafting of this EQIA due regard has been given to the three needs of the equality duty: to eliminate unlawful discrimination; to advance equality of opportunity between people who share a protected characteristic and those who don't and to encourage or foster good relations between people who share a protected characteristic and those who don't.

The EQIA gathered a range of data and information to inform the analysis of the likely impact of the MMR proposal. In particular:

- Review of evidence gathered from tenancy return forms for those currently accessing MMR homes through the Affordable Housing Supply Programme.
- Supporting documentation from PfP. This includes the outcomes of its own Equality Impact Assessment to determine any impact on equality, diversity and human rights of its MMR proposal. This assessment determined the level of internal EQIA required by PfP.

The evidence gathered considered:

- the potential impact of the successful proposal on the 2010 Equality Act;
- any actions taken by PfP to mitigate negative impacts and
- examples of how the PfP has promoted access to protected groups

## Key Findings

Having reviewed all evidence and supporting documentation in relation to the successful proposal, no negative impacts were identified by the Equality Impact Assessment. As outlined within the publication 'Equality Objectives - Ensuring successful places and enabling people to reach their potential 2015-2018'; equality is embedded into PfP's ethos (see link below which set out PfP's equality objectives).

<https://www.placesforpeople.co.uk/about-us/about-the-group/corporate-responsibility/diversity-and-equality/>

Overall, the Scottish Government expects that through the MMR Invitation, PfP will have a positive impact across a number of the protected groups, through the provision of long-term affordable housing.

PfP's approach to advertising, application, assessment and allocation of the properties is transparent and accessible for all. The collection of data on beneficiaries will form part of PfP reporting requirements and should provide assurance that PfP is addressing equalities issues through a varied portfolio of homes and a fair and transparent allocation policy.

MMR is aimed at assisting people on low and modest incomes to access affordable rented accommodation – it is important however that prospective tenants are not discriminated against as a result of the source of that income, for example, through a work or state pension or social security contributions. The PfP portfolio will be monitored and there will be flexibility to ensure PfP can meet demand appropriately and that it is not limiting housing options from protected groups. The results of this will determine any possible action areas.

## **Recommendations and Conclusion**

The EQIA process has provided reassurance that the provision of long-term affordable housing through Places for People will not negatively impact on any particular equalities group and that equalities duties will be subject to regular review as part of the reporting process by PfP to the Scottish Government.

PfP will meet its equalities duties through both its acquisition policy and its allocation of tenancies. PfP will be required to work with Local Authorities and their Strategic Housing Investment Plans (which will have been part of a Council-led EQIA for the overall housing approach in that area) for acquiring

homes in specific Local Authority areas. This will ensure that PfP is delivering the right homes in the right place.

It is recommended that PfP has in place robust systems to collate information on homes as they become available for rent and of those successfully offered tenancies. It is also recommended that once a sufficient portfolio of homes has been purchased that PfP engages with relevant stakeholder groups representing people in the protected characteristic groups to further help monitor and promote its equalities duties.

Evidence of how equalities duties are being addressed will be provided by PfP to the Scottish Government on an on-going basis, mainly through the completion of an Annual Performance Report on lettings from the Target Tenant Group, which will provide assurance that it has not discriminated either directly or indirectly against its tenants. If however, PfP becomes aware of any fact, circumstance or matter which has, or may have, an adverse effect on its equalities duties then it shall promptly notify the Scottish Government in writing.

The Scottish Government will review this EQIA with PfP and at the appropriate time, once sufficient homes have been made available for rent, will provide an opportunity for PfP to engage with stakeholder groups. If necessary, following the review, the EQIA will be updated to reflect shifts or trends that appear in who is accessing the PfP portfolio.