

Integrated Impact Assessment

Integrated Impact Assessment – Summary Report

1. Title of proposal

Housing Emergency Action Plan Biannual Update – August 2026

2. What will change as a result of this proposal?

On 2 November 2023 the City of Edinburgh Council declared a Housing Emergency. The Housing, Homelessness and Fair Work Committee agreed a high-level Housing Emergency Action Plan (HEAP) on 5 December 2023. The HEAP was refreshed for its Biannual Update in June 2025 to focus on addressing Housing Supply and Demand for Housing and the IIA updated to reflect this review and the number of actions rationalised to focus on the themes of supply and demand.

This IIA is the annual update of the previously published IIA in June 2025. This IIA includes updated evidence relevant to impacts on particular groups.

Through this proposal, there will be an increase in settled accommodation available in the city, a decrease in homeless households in the city, a decrease in the use of unsuitable accommodation for homeless households in the city, a simplified model for accessing homeless accommodation should it be required, an increase in homelessness prevention activities. There is also a significant £1.6bn investment in housing and homelessness services being delivered over the next several years.

3. Briefly describe public involvement in this proposal to date and planned

For the review of the HEAP, in 2025 an online session was held with 18 external partner organisations with a proposal to take a refreshed HEAP out to further consultation. A subsequent four in person sessions were held, with 89 people signing up to attend, resulting in 71 people turning up on the day (not including facilitators). This was a mixture of external and internal stakeholders.

For the first HEAP there were 14 workshops held to inform the content of the Housing Emergency Action Plan. This has included Councillors, third sector partners, tenants' representatives and community planning partners.

4. Is the proposal considered strategic under the Fairer Scotland Duty?

Yes. The HEAP proposals subject to this impact assessment will significantly affect how social housing is accessed in the city.

5. Date of IIA

1 July 2026.

6. Who was present at the IIA? Identify facilitator, lead officer, report writer and any employee representative present and main stakeholder (e.g. Council, NHS)

Name	Job Title
Derek McGowan	Service Director – Housing and Homelessness
Jill Thomson	Housing and Homelessness Services
Martin Macaulay	Senior Housing Development Officer
Andrew McCloskey	Senior Housing Development Officer
Sarah Rankin	Housing Development Officer

7. Evidence available at the time of the IIA

Data on populations in need	Edindex Housing Register	Total number of applicants on Edindex 30,694 (31 March 2026)																										
		Total number awarded gold priority 445 (31 March 2026)																										
		Total number with Silver – Homeless priority 8,811 (31 Mar 2026)																										
		Total number with Demo and Officer Panel priority 298 (31 Mar 2026)																										
		Total number with Overcrowding priority 1,277 (31 Mar 2026)																										
		Total number with Under-occupation priority 175 (31 Mar 2026)																										
		Total number of applicants with waiting time points only 19,688 (31 Mar 2026)																										
		Average number of bids for social rented homes advertised for let on Edindex is 288 (CEC), All landlords 399 (1 Apr 2025- 31 Mar 2026).																										
		<table><tr><th>Choice Priority Group</th><th>Number of applications at 31/03/2026</th><th>Percentage</th></tr><tr><td>1. Gold</td><td>445</td><td>1.45 %</td></tr><tr><td>2a. Silver - Homeless</td><td>8811</td><td>28.71 %</td></tr><tr><td>2b. Demo & Officer Panel</td><td>298</td><td>0.97 %</td></tr><tr><td>2c. Overcrowding</td><td>1277</td><td>4.16 %</td></tr><tr><td>2d. Underoccupation</td><td>175</td><td>0.57 %</td></tr><tr><td>3. Waiting Time</td><td>19688</td><td>64.14 %</td></tr><tr><td>Sum:</td><td>30694</td><td></td></tr></table>			Choice Priority Group	Number of applications at 31/03/2026	Percentage	1. Gold	445	1.45 %	2a. Silver - Homeless	8811	28.71 %	2b. Demo & Officer Panel	298	0.97 %	2c. Overcrowding	1277	4.16 %	2d. Underoccupation	175	0.57 %	3. Waiting Time	19688	64.14 %	Sum:	30694	
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Homeless ness	There were 3, 974 households assessed as homeless in 2025/26.																											

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
	Presentations Homelessness journey times	Homelessness case length currently averages 590 days over the period Apr 25 to Apr 26. 6,572 households as of April 25 / 12,100 people in temporary accommodation, most of who required social housing.
Data on service uptake/access	Cause of homelessness Homelessness demographics	For the period 1 Apr 2025 and 30 Apr 2026 Household Dispute (Non-Violent) 39.5% Household Dispute (Violent) 9.7% Tenancy Loss PRS 8.7% 41.3 % of households have one or more support needs The support needs of households presenting as homeless includes: • Mental health – 27.7% • Learning Disability – 4.3% • Physical Disability – 9.8% • Medical Condition – 11.5% • Drug or Alcohol Dependency – 6.7% • Basic Housing Management / Independent Living Skills 10.6%

Data on socio-economic disadvantage e.g. low income, low wealth, material deprivation, area deprivation.	Cause of homelessness / Homelessness demographics	As above 9,508 open homeless cases with statutory rights to temporary accommodation and housing as of 31 March 26. 1 in 5 children in Edinburgh experience poverty, with a clear, established link between areas identified as multiply deprived through Scottish Indices of Multiple Deprivation, social housing and poverty. The following types of family are identified by Scottish Government as being more likely to be living in poverty: lone parent families; minority ethnic families; families with a disabled adult or child; families with a younger mother; families with a child under one; families with three or more children (Ref: https://www.gov.scot/publications/tackling-child-poverty-priority-families-overview/pages/introduction/)	
Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal	
Data on equality outcomes	Equality data for EdIndex registrations		
		Ethnicity	Number of applications at 31/03/2026 00:00:00
		African: Other	688
		Asian. Asian Scottish/British:Bangladesh	220
		Asian. Asian Scottish/British:Chinese	129
		Asian, Asian Scottish/British:Indian	190
		Asian. Asian Scottish/British:Other	389
		Asian. Asian Scottish/British:Pakistani	560
		Black,Black Scottish/British	150
		Black,Black Scottish/British:African	1656
		Black,Black Scottish/British:Caribbean	113
		Gypsy - Traveller	37
		Mixed	651
		Not known	1229
		Other:Arab, Arab Scottish or British	1281
		Other Black or Caribbean	92
		Other Ethnic Background	713
		Refused to answer	112
		Ukrainian	860
		White:English	358
		White:Irish	196
		White:Other	1782

		White:Other British	1328
		White:Polish	1599
		White:Roma	36
		White:Scottish	16307
		White:Welsh	18
		Sum:	30694
		Age Band	Number of applications at 31/03/2026 00:00:00
		a. 16-17	126
		b. 18-24	2996
		c. 25-35	8124
		d. 36-59	14582
		e. 60+	4866
			30694
		Sex	Number of applications at 31/03/2026 00:00:00
		Female	15424
		Male	15270
		Sum:	30694
		Self-assessed disability	Number of applications at 31/03/2026 00:00:00
		Disabled	9351
		Not disabled	21343
		Sum:	30694

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
Research/literature evidence	<u>Rapid Rehousing Transition Plan</u>	Homelessness data shows that 32% of presentations are due to family breakdown. HARSAG recommendations, Scottish Government Ending Homelessness Together Action Plan and CEC's Rapid Rehousing Transition Plan all evidence the need to reduce the number of households in temporary accommodation and prevent homelessness wherever possible. Scottish Government Ending Homelessness Together Action Plan (Nov 2018) – overview of homelessness in Scotland and ambitions of Scottish Government to prevent and end homelessness, including role and duties of local authorities in helping to achieve this. Social Bite/Heriot Watt University report on Temporary Accommodation in Scotland (Nov 2018) highlights pressures on temporary accommodation in Edinburgh. The Preventing Homelessness in Scotland recommendation from the Prevention Review Group and the subsequent joint Scottish Government and CoSLA Prevention Duty consultation paper, identified the ways in which prevention of homelessness as a legal duty may be achieved and defines homelessness prevention as a shared responsibility across public bodies. The Youth homelessness Prevention Pathway published by A Way Home Scotland lays out a pathway to ending youth homelessness and identifies issues that more commonly arise for young people. In Edinburgh there is a Housing Options Protocol in place for young people leaving care. The care leavers housing protocol's aim is to avoid care leavers having to go through the homeless route to secure accommodation, instead they will be supported and awarded Exceptional Housing Need priority, which will give them a reasonable preference when bidding for social rented accommodation. As of March 2026, 109 young people had the above priority.
Public/patient/client experience information	Customer satisfaction with Council landlord function	Percentage of tenants satisfied with the overall service –67.2% (2024) Percentage of tenants who felt their landlord is good at keeping them informed about their services and outcomes –68.1% (2024) Percentage of tenants satisfied with the opportunities to participate in the landlord's decision making –82.4% (2024)

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected and to the environmental impacts of your proposal
Evidence of inclusive engagement of people who use the service	Tenant Participation Strategy Ongoing work with Edinburgh Tenant Federation Homelessness Services Information	The Tenant Participation Strategy 2025-28 includes actions to review all communication to ensure that they are clear and accessible to all tenants. Work is ongoing with Edinburgh Tenants Federation to ensure that communication includes innovative digital ways to engage with tenants. Based on a survey with tenants, it is estimated that c.50-60% of Council tenants have internet access at home, comparing to 85% of the households having access to the internet in Scotland (Scottish Household Survey 2023). All appropriate letters and guidance from homelessness services is provided in the service users' chosen language. Ongoing work on 'Get connected' with Simon Community with a commitment of 40 devices for homeless people who do not have digital devices and require them to assist with their homeless journey.
Evidence of unmet need	Internal data	6,198 (June 2026) households in temporary accommodation, most of whom required social housing.
Good practice guidelines		Council House Allocation Policy Rapid Rehousing Transition Plan (incorporated into Edinburgh's Local Housing Strategy)
Carbon emissions generated/reduced data		These will be generated for individual housebuilding programmes.
Environmental data		These will be generated for individual housebuilding programmes.

Risk from cumulative impacts		The housing emergency action plan contains a series of proposals aimed at improving access to housing, securing best value and ensuring funding levels are appropriate, reducing void property numbers, reducing homelessness, improving prevention measures and increasing the number of affordable homes in the city. There are key proposals about improving and increasing the supply of affordable homes, improving access to housing and managing demand for housing more effectively. It is not believed that this proposal presents a greater risk to any particular protected characteristic.
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8. In summary, what impacts were identified and which groups will they affect?

Equality, Health and Wellbeing and Human Rights	Affected populations
Positive The proposals, including the budget investment of £1.6bn aim to greatly increase the number of affordable homes in the city across a range of tenures as well as increasing the supply of suitable temporary accommodation. This will have significant positive impacts on all protected characteristics equality, health, wellbeing and human rights. In addition, the HEAP aims to improve access to housing, secure best value, ensure funding levels are appropriate, reduce void property numbers, prevent and reduce homelessness. The HEAP also aims to support increased supply of accessible and adapted homes ensuring that we have good quality homes to meet the needs of people with different protected characteristics, as well as best use of existing stock and encourage 'rightsizing' of affordable homes. The Council's Letting Policy is also being reviewed to ensure it meets the needs of a fair allocations policy that is fit for purpose.	All
Negative The suspension of the allocations policy has meant that people of all protected characteristics and economic backgrounds have been unable to bid for or	

secure permanent settled accommodation with the Council, other than those with disabilities. The revised Council lettings policy may foster negative perceptions between people with protected characteristics as there will be differences in the priority status of different groups.	
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Environment and Sustainability including climate change emissions and impacts	Affected populations
Positive Acquisition of homes which may not otherwise be used, ensures ongoing sustainability of properties that meet a range of building types required during the housing emergency. Modern building methods improve energy efficiency of homes which have positive impacts for tenants. Improved use of adapted and accessible properties, along with increased 'rightsizing' of properties will ensure greater sustainability of council stock. Any external contractors will be required to comply with equality legislation and the Council's sustainability commitments. This will support 'A Just Transition' by ensuring people from protected characteristic backgrounds are living in houses that meet a certain standard overtime, and in turn tackling the inequality around the impacts of climate change.	All
Negative Large scale building developments will have increased impacts on environmental and climate emissions, but modern building methods will ensure reduced climate emissions for tenants. Protected Characteristic communities across Edinburgh are vulnerable to a range of impacts from climate change including flooding, damage to property and temperature fluctuations. Climate change impacts are frequently felt most by the poorest and most marginalised groups in society, who may also suffer from reduced health and wellbeing.	

Economic	Affected populations
The proposals will enhance the economic prospects of those experiencing homelessness by improving access to settled accommodation. Homelessness is understood as a key driver of poorer life outcomes, including employability, physical and mental health, and educational attainment. Improving access to settled accommodation quicker, especially for households including children and young people, will have a positive impact on these factors. The Housing Revenue Account will benefit from increased rental income due to the increased number of tenanted properties, and improvements in the time taken to return property to lettable standard. There will be benefits to the General Fund through the decreased reliance on unsuitable accommodation as temporary accommodation. The increased £1.6bn investment in housing and preventative services will be feeding into the local economy.	
Negative Potential increase in General Fund expenditure to obtain suitable accommodation. Households may face further challenges in finding and retaining employment during the housing emergency. Council funded employability services and the Edinburgh Guarantee will be available to those that need it.	

9. Is any part of this policy/ service to be carried out wholly or partly by contractors and if so how will equality, human rights including children's rights, environmental and sustainability issues be addressed?

Any contractors used will be through the agreed in line with the Council's procurement guidance and are awarded in line with the Council's Contract and Grant Terms & Conditions that align with the above policy areas.

10. Consider how you will communicate information about this policy/ service change to children and young people and those affected by sensory impairment, speech impairment, low level literacy or numeracy, learning difficulties or English as a second language? Please provide a summary of the communications plan.

An overall HEAP Communications plan will be complemented by additional comms related to particular actions within the HEAP, such as the additional £1.6bn investment in housing and homelessness services or consultation events regarding the Allocations Policy Review. The HEAP also has its own dedicated web page.

11. Is the plan, programme, strategy or policy likely to result in significant environmental effects, either positive or negative? If yes, it is likely that a Strategic Environmental Assessment (SEA) will be required and the impacts identified in the IIA should be included in this. See section 2.10 in the Guidance for further information.

No.

12. Additional Information and Evidence Required

None.

13. Specific to this IIA only, what recommended actions have been, or will be, undertaken and by when? (these should be drawn from 7 – 11 above) Please complete:

Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts)	Who will take them forward (name and job title)	Deadline for progressing	Review date
Regular updates to the Housing Emergency Action Plan webpages	Jill Thomson (Housing and Homelessness Strategy Manager)	Bi annually	February 2027

Review of IIA	Derek McGowan (Service Director – Housing and Homelessness)	Bi annually (with each individual project having an individual IIA)	February 2027
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14. Are there any negative impacts in section 8 for which there are no identified mitigating actions?

No.

15. How will you monitor how this proposal affects different groups, including people with protected characteristics?

A programme tracker has been developed to monitor progress. This will be used by officers to track progress, and reported to the Housing, Homelessness and Fair Work Committee on a cyclical basis. Governance groups are in place to share development of HEAP actions and provide strategic oversight of the HEAP's direction.

16. Sign off by Head of Service

Name: Derek McGowan

Date: 13 August 2026

17. Publication

Completed and signed IIAs should be sent to:
integratedimpactassessments@edinburgh.gov.uk to be published on the Council website
www.edinburgh.gov.uk/impactassessments

Edinburgh Integration Joint Board/Health and Social Care
sarah.bryson@edinburgh.gov.uk to be published at <https://www.edinburghhsc.scot/the-ijb/integrated-impact-assessments/>