

# **Gypsy/Traveller Accommodation Fund and Site Design Guide**

## **Equality Impact Assessment - Results**

**February 2022**



**Scottish Government**  
Riaghaltas na h-Alba  
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## Equality Impact Assessment - Results

<b>Title of Policy</b>	Gypsy/Traveller Accommodation Fund and Site Design Guide
<b>Summary of Aims and Desired Outcomes of Policy</b>	More and Better Accommodation for Gypsy/Traveller communities in Scotland resulting in better outcomes for residents
<b>Directorate: Division: Team</b>	Directorate for Housing, Social Justice and Regeneration: Better Homes Division: Private Housing Services

### Executive Summary

Following commitments to deliver more and better accommodation in both [Improving the lives of Scotland's Gypsy/Travellers: 2019-2021](#) and [Housing to 2040](#), the Gypsy/Traveller Accommodation Fund opened for applications in June 2021. The Fund is intended for both significant renovation and improvements of standards on existing sites and the building of new sites.

Alongside the Fund, to drive a significant improvement in the quality of sites going forward, we have developed a Site Design Guide for Gypsy/Traveller sites, in conjunction with residents and local authorities. This will set the direction for new accommodation, in keeping with the key principles of Housing to 2040 such as accessibility and energy efficiency, which are important for all our homes.

The Fund will initially be focussed on a number of demonstration projects that can establish examples of model sites. These first projects will allow us to take a flexible approach, trialling the Site Design Guide, exploring what good quality Gypsy/Traveller accommodation that reflects Housing to 2040 principles looks like, and seeking cost effective ways of delivering it. This approach will be reviewed in later years of the Fund.

The Fund and the Site Design Guide are intended to help meet the following outcomes for Gypsy/Traveller accommodation that have been developed to take in to account equalities impacts:

- More accommodation - enough sites/pitches to meet the established needs of Gypsy/Traveller communities;
- Accommodation in suitable locations, taking into account place making principles including, for example, access to local services;
- Sites that provide pleasant places to live and include attractive outdoor space, communal facilities and appropriate facilities, including for children and young people;
- A mix of accommodation with layout and facilities that meet the needs of residents and provides for different family sizes and preferences and to allow for movement to different accommodation on the same site if circumstances change;
- Accommodation built to a high standard, in line with other public housing and relevant principles set out in Housing to 2040;

- Accommodation that is durable, sustainable, flexible, safe, secure, digitally connected, warm and economic to run and at a level of rent that represents value for money for residents;
- Accommodation that meets accessibility standards and provides for a range of needs, including families with members who are elderly, disabled or have caring responsibilities;
- Improved satisfaction with accommodation and more meaningful engagement with Gypsy/Traveller communities;
- Additional transit provision, where needed, to facilitate travelling and foster good relations with the settled community.

Gypsy/Travellers are recognised as sharing a protected characteristic on the grounds of race under Equalities legislation. This Equality Impact Assessment (EQIA) considers the impact of the Gypsy/Traveller Accommodation Fund and Site Design Guide on Gypsy/Travellers and how this might intersect with other protected characteristics such as age and disability.

The EQIA drew on evidence from a range of sources. The main published sources were the 2011 Census and an Evidence Review on Gypsy/Traveller Accommodation Needs that was published by the Scottish Government in 2020. This was supplemented by an online survey where members of Gypsy/Traveller communities were asked to give their views on the content of the draft Site Design Guide for Gypsy/Traveller sites. We also held consultation events with members of Gypsy/Traveller communities over summer 2021 on the Site Design Guide and some Gypsy/Travellers were involved in assessing the proposals to the Gypsy/Traveller Accommodation Fund.

The EQIA reemphasised many of the issues that had been highlighted through work with Gypsy/Traveller communities during the Short Life Working Group that was established to develop the accommodation actions for Improving the Lives of Gypsy/Travellers and subsequently the More and Better Accommodation Working Group. Many of the current sites in Scotland do not offer a good standard of living for residents and more sites are needed that can meet the changing needs of residents over time. The Site Design Guide and the outcomes for the Gypsy/Traveller Accommodation Fund seek to respond to the equalities issues highlighted in development e.g. for younger and older Gypsy/Travellers and those with disability/carers.

## **Background**

Our joint Action Plan, Improving the Lives of Scotland's Gypsy/Travellers: 2019-21, was published with COSLA in 2019 and commits to providing more and better accommodation for Gypsy/Travellers. Together, we are working with stakeholders and Gypsy/Traveller communities on issues such as investment and improving quality on sites.

As a result of this work, Housing to 2040 - a vision for housing in Scotland to 2040 – announced up to £20 million of funding available over five years from 2021/22 for more and better Gypsy/Traveller accommodation. Building on the £2 million of short term funding in 2020/21, this represents a sustained investment to support local authorities to improve and widen access to Gypsy/Traveller accommodation.

## **The Scope of the EQIA**

This EQIA covers the development and delivery of the Gypsy/Traveller Accommodation Fund and accompanying Site Design Guide.

After drafting an overview of content we wished to include in the Site Design Guide, which included research of similar guides in other parts of the UK, consideration of information we had gathered through the development of the Action Plan and an online survey open to members of Gypsy/Traveller communities we produced a first draft of the guide. Over summer 2021 we consulted with stakeholders including members of Gypsy/Traveller communities, third sector organisations who work with Gypsy/Travellers and local authorities. We have incorporated the views of those stakeholders into changes we have made to the Site Design Guide, with a particular focus on the views of community members. The Site Design Guide will continue to evolve through continued engagement with Gypsy/Traveller communities and local authorities on the delivery of the first demonstration projects under the Fund.

We aligned the outcomes for the Site Design Guide with those of the Fund. The outcomes are included in the guidance on proposals and evaluation criteria for the Fund and will link in to offers of grant. Local authorities were invited to submit initial bids to the fund in June 2021. Delivery of the Fund is overseen by an Oversight Board who make recommendations to Ministers on the projects that should be funded. We involved members of Gypsy/Traveller communities in the assessment of the proposals who gave a view on the proposals from the perspective of Gypsy/Travellers.

## **Key Findings**

There is a bank of evidence and data that the Gypsy/Traveller population continues to face high levels of discrimination and harassment in Scotland (Craigforth & Engage Scotland 2018; Grampian Regional Equality Council (GREC) 2017; EHRC 2015; Scottish Government 2015b). Data from the Scottish Social Attitudes survey shows that Gypsy/Travellers, as a group, are the subjects of 'fairly widespread discriminatory attitudes'.

Gypsy/Travellers are more likely than the general population to have a limiting long-term health problem or disability; 28% compared to 20%. This emphasised the need to provide accommodation that is accessible and can meet the needs of people as they change over time.

Gypsy/Travellers are twice as likely as those in the wider population to live in a lone parent household and are much more likely to have dependent children, (36%) compared to the rest of the population (26%). Gypsy/Traveller households are also three times as likely to contain three or more dependent children. The EQIA emphasised that sites need to meet the needs of all Gypsy/Travellers including providing facilities for children and young people, including access to digital services. The importance of this was emphasised during the COVID-19 pandemic when education and other services were increasingly delivered online.

With regards to accommodation, Gypsy/Travellers were twice as likely to live in rented accommodation, with two fifths (40 per cent) social renting compared to only

one fifth (21 per cent) of the population as a whole. A much higher percentage of Gypsy/Traveller households lived in a 'caravan or other mobile or temporary structure' – 14 per cent did so compared to less than one per cent of all households. Conversely, a lower proportion of Gypsy/Traveller households lived in houses or flats. Only 43 per cent of Gypsy/Travellers lived in a house compared to 63 per cent of the population as a whole. Gypsy/Traveller households were more than twice as likely to be overcrowded – almost a quarter (24 per cent) of Gypsy/Traveller households were overcrowded compared to less than one tenth (9 per cent) of all households. Gypsy/Traveller households were more likely to have no central heating (5 per cent) than all households (2 per cent). They were also more likely to have 'electric central heating' and '2 or more types of central heating'.

The EQIA reemphasised many of the issues that had been highlighted through work with Gypsy/Traveller communities on the Action Plan.

Key themes were:

- While the introduction of Minimum Standards for Gypsy/Traveller sites brought about some improvements for residents, many sites in Scotland do not offer a good standard of living for residents. The quality of accommodation has fallen behind that of the settled community.
- There are not enough Gypsy/Traveller sites in Scotland, but also a lack of evidence to say where accommodation is needed.
- Pitch sizes on existing sites are too small and do not allow families to grow and live together in the way they want to.
- Sites need to be future proofed as the population ages to prevent people being forced into housing due to lack of support/availability of accommodation suitable for older or disabled people.

The Fund and the Site Design Guide seek to address these issues by:

- Establishing parity with the most relevant standard for the settled community with the standards required by the Site Design Guide.
- Stretch and future proof, where there is a need to do this to meet the outcomes and to ensure that Gypsy/Traveller accommodation develops in line with the principles in Housing to 2040.
- Improving access to suitable, good quality accommodation which has the potential to support health improvement, educational achievement and employment opportunities, all of which can impact on poverty and inequality of outcomes.

While the Site Design Guide already sought to address the inequalities highlighted by Gypsy/Traveller communities, a greater emphasis was placed on some of the issues raised through the EQIA process, for example the need to increase pitch sizes to accommodate growing families and carers. Some additions were made to the Site Design Guide as a result of the EQIA process:

- A requirement that new Gypsy/Traveller accommodation meets Housing for Varying Needs requirements was already included in the Guide. The Impact Assessment highlighted just how crucial meeting the needs of elderly and disabled Gypsy/Travellers is and the Site Design Guide emphasises the need to engage with site residents on what their needs are. Sites in the future should

be designed to meet the changing needs of residents over time. The Impact Assessment highlighted the need to consider other issues such as dementia and autism and this has been added to the Site Design Guide.

- We held a joint workshop for the EQIA and the CRWIA and this highlighted the need to specifically consider the needs of young Gypsy/Travellers. The Site Design Guide emphasises the need to consider the views of young people when designing Gypsy/Traveller sites. It also requires that communal indoor and outdoor space is provided that meets the needs of all ages through consultation with the residents of sites.
- The COVID-19 pandemic highlighted how vulnerable Gypsy/Traveller communities are to digital exclusion. Fibre broadband should be considered as being the equivalent of a utility service and site providers should be able to show that they have taken account of current and future digital services or installation needs. This is particularly important as more services and education are delivered digitally.
- Fuel poverty is an issue for Gypsy/Traveller communities. Gypsy/Travellers have told us that some existing amenity blocks are cold, difficult to heat and prone to condensation. The energy efficiency and heating method for amenity blocks or residential mobile homes will impact on affordability of heating and on the risk of fuel poverty for residents. The Site Design Guide requires that the specification used for renovation or new build should deliver low levels of heat loss, consistent with or better than that required in social housing.
- Through our engagement with members of the Gypsy/Traveller community, the location of the site was highlighted as an issue that impacts on the ability to maintain good neighbour relations. As a result of discussions, the Site Design Guide suggests that, when engaging with the settled community consideration should be given to involving members of Gypsy/Traveller communities in discussions in order to break down barriers and build understanding. Ideally, this would be facilitated through a third sector organisation.

## **Recommendations and Conclusions**

While the policy already aimed to address inequalities faced by Gypsy/Traveller communities in relation to accommodation provided on public sector sites, the EQIA process highlighted some additional issues that have been incorporated into the outcomes for the Fund and the Site Design Guide. The content of the Site Design Guide has been added to in order to address issues highlighted by the EQIA.

As the demonstration projects progress we will continue to engage with Gypsy/Traveller communities and make any further changes required to the Fund or Site Design Guide that are highlighted by this ongoing process.



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