
Report to: Clackmannanshire Council

Date of Meeting: 2nd October, 2025

Subject: Reinforced Autoclaved Aerated Concrete (RAAC) – Update

Report by: Strategic Director (Place)

1.0 Purpose

- 1.1. This report provides Council with an update on the engagement and governance arrangements agreed at the Council meeting in June 2025 and seeks further governance approval to enable officers to progress action and avoid any impasse that may impede the remediation and regeneration of the affected blocks and or area.

2.0 Recommendations

It is recommended that Council:

- 2.1. **Note**, the outcomes of actions taken by officers following approval at June Council at section 4,
- 2.2. **Approve** that, should owners not legally commit to any of the voluntary opportunities by 31 March 2026, or should the Council need to pursue further action (for example, under the Tenements Act), the Section 95 Officer may recharge the associated costs, as detailed in paragraph 3.13,
- 2.3. **Approve** a minor refinement to the voluntary acquisition offer as referenced in paragraph 3.14 and reaffirm the Council's overall position on the voluntary offer as agreed at the June Council meeting,
- 2.4. **Approve** that, where owners voluntarily commit to progressing the communal repairs, the Council will contribute up to (£500 exclusive of VAT) towards their legal fees for the sign-off of the relevant documentation. This gesture of goodwill would be withdrawn should the Council need to pursue any alternative course of action, as outlined in paragraph 4.3,
- 2.5. **Approve** the designation of the Strategic Director of Place as the Council's Proper Officer for the purposes of the Housing (Scotland) Act 1987 as detailed in paragraph 4.33,
- 2.6. **Approve** that the Strategic Director of Place, in consultation with the Senior Manager (Legal & Governance), is granted authority to progress the governance arrangements as set out in this report, specifically those referenced in paragraphs 4.33 to 4.34,

3.0 Background

- 3.1. The Dangerous Building Notice compliance that led to the evacuation of three blocks has been deeply challenging for all involved, and the Council acknowledges the emotional impact this has had on residents over the past two years. Officers have consistently sought to take a customer-focused and trauma-informed approach, recognising the distress caused by owners/tenants being asked to leave their home, especially when the nature of the risk was not immediately visible or perhaps easily understood.
- 3.2. Throughout, the Council has prioritised support for affected individuals, taking a proactive lead in meeting legal obligations and absorbing significant costs, both financial and in officer time.
- 3.3. In circumstances such as these there is rarely a solution that satisfies all parties. The Council has sought to act responsibly and compassionately, even where the outcomes have been met with mixed responses.
- 3.4. In light of the above, it may be prudent for the Council to establish an early strategic approach to costings, charges, and engagement with the remaining seven blocks where RAAC is present, particularly in the block where the Council holds a minority ownership interest. This could support more consistent decision-making and resource planning going forward.
- 3.5. At its June meeting Council approved that authorised officers would engage with private owners in three blocks of flats in Tillicoultry, where evacuation action was undertaken due to the Dangerous Building Notice. These blocks form part of the wider group of ten identified as affected with RAAC within Council stock.
- 3.6. The purpose of the engagement was to seek undertakings from private owners regarding repair options and the financing of such works. Officers were also empowered to make voluntary purchase offers for affected properties, based on parameters approved by Council.

Tenant Engagement

- 3.7. Following the June Council meeting, officers engaged with tenants who had been decanted from their homes to determine their preferred long-term housing arrangements. Fourteen of the fifteen Council tenants chose to remain in their decant properties, which have now been converted into permanent secure tenancies with formal agreements in place. This outcome reflects the care and support provided throughout the decant process and demonstrates that tenants have successfully settled into their new homes. One remaining tenant has opted to return to 33–51 High Street once repair works are completed.
- 3.8. Considerations
- 3.9. The Council has, at times, received feedback from private owners regarding the pace of its response to the Dangerous Building Notice. While the importance of timely action is fully recognised, it is equally important to acknowledge that this has not been a straightforward or routine matter. Engineering solutions have continued to evolve throughout the evacuation period, requiring officers to reassess approaches and make informed strategic decisions. As a result,

progress has not always been within the Council's direct control, and the complexity of the situation has inevitably influenced the pace at which certain actions could be taken.

- 3.10. It is important to note that the Dangerous Building Notice was served on all owners of the affected blocks, including the Council. To date, no other owner has independently progressed actions to expedite compliance with the notice. In contrast, the Housing Landlord Service, which has a statutory duty to act on behalf of its 5,000+ tenancies, has taken a lead role in managing the RAAC response.
- 3.11. Much of this work has been undertaken without formal tracking or dedicated costing, and has, at times, diverted attention from core housing priorities. This represents a significant resource commitment, particularly in supporting the needs of eleven private owners who share equal responsibility for compliance.
- 3.12. In light of the current circumstances, it is noted that some owners may be using this period to assess whether the Council's position might change, either through enhanced compensation for voluntary sales or a reduction in their financial contributions toward repair costs.
- 3.13. The Council's voluntary purchase offer was developed in accordance with Best Value principles, seeking to balance support for affected owners with the need to safeguard public finances and tenants' interests. Officers remain confident that the offers made, whether for voluntary sale or repair, represent a fair and reasonable approach. Notably, the offer included writing off previously provided support, which conservatively equates to around £5,000 per owner, excluding significant staff time. While this was a discretionary contribution, it may not have been fully recognised or appreciated as such. Should owners not take up any of the voluntary opportunities by 31 March 2026, or should the Council need to pursue further action (for example, under the Tenements Act), the Section 95 Officer reserves the right to recharge these costs.
- 3.14. On reflection officers are requesting that Council approves a limited variation to the voluntary acquisition offer. Where discussions indicate that an owner is willing to proceed with a voluntary sale, and only where early repayment of a mortgage is evidenced as a barrier to completing the transaction to the Section 95 Officer, the Council may consider offering targeted assistance. This approach reflects a feature of the scheme currently operated by Aberdeen City Council.
- 3.15. While it is entirely understandable that owners continue to feel frustrated by the discovery of RAAC in their properties, many remain active in campaigning for financial support from either the UK or Scottish Governments. The Council's financial package was designed to be flexible, and should a national scheme be introduced officers would advocate that those who have already sold voluntarily to the Council are not disadvantaged, insofar as the Council is able to influence such matters.
- 3.16. It is important to note that both governments have maintained their position that no financial assistance will be provided for RAAC-related costs. However, if a national scheme were to be introduced it may focus solely on the direct costs of RAAC remediation. Based on estimates from the Council's term contractor, the RAAC-related cost per owner is approximately £8,000. Other associated

works such as roof replacement, external rendering and thermal enhancements are unrelated to RAAC, and have been acknowledged by owners as their responsibility under existing shared ownership arrangements.

- 3.17. In addition, a number of owners have requested greater flexibility regarding deposit arrangements, including the possibility of placing deposits in escrow or interest-bearing accounts, to be drawn down on a phased basis as works are completed. The Section 95 Officer has been asked to review these requests. A critical consideration in any decision will be the ability of individuals to evidence sufficient funding to cover costs, or to meet the relevant affordability criteria, in order to protect the Council's financial outlays. As set out in the June Council report, these provisions can be reviewed on a case-by-case basis with each owner, ensuring the Council's interests are protected while also being fair to the wider tenant rent payer base funding the works.

4.0 Progress to Date

- 4.1. Across the three evacuated blocks officers have engaged with a total of 11 sharing owners. Of these, four owners expressed interest in a voluntary sale to the Council. At the time of writing, two of these sales are nearing completion, with legal transfer processes underway. In the third case, officers have initiated direct discussions with the mortgage lender to help progress the acquisition. The 4th and final owner who has expressed preference or willingness to sell has only done so at a level significantly above the parameters agreed by Council or seen by officers as offering best value. As noted earlier, officers are not recommending any significant changes to the voluntary sale criteria, and as such, discussions in this case have reached an impasse.
- 4.2. At 33–51 High Street, Tillicoultry, two further properties will be in Council ownership at the time of the Council meeting. The two remaining owners verbally agreed to proceed with the necessary repair works and have demonstrated their ability to fund these repairs. These voluntary agreements, covering both sales and repairs, have enabled the Council to initiate the process involved in the planned improvement works to the block. This includes a full certified structural engineer design and drawing of the suitable roof replacement including full RAAC removal.
- 4.3. A key milestone will be when owners receive the full legal documentation, which will confirm the scope of works, associated charges, deposit requirements, any professional and legal costs associated with the managing of the works and the full implications of non-payment. Owners will continue to be encouraged to seek independent financial and legal advice. To facilitate this, and in recognition of owners voluntarily coming forward to progress matters, it is recommended that the Council contribute up to £500 (exclusive of VAT) towards their legal fees for the sign-off of such documentation. This gesture of goodwill would be withdrawn should the Council need to pursue any alternative course of action. If the legal agreements are finalised and signed, it is anticipated that works could commence before Christmas, with remaining elements scheduled after the winter shutdown.

6-22 Park Street & 75-97 Chappelle Crescent

- 4.4. Seven owners then remain across the above affected blocks (Park Street & Chappelle Crescent), the majority of whom are private landlords.
- 4.5. Of this seven, four owners have either not clearly indicated a preference or have not responded to either of the options presented.
- 4.6. A key challenge with some remaining owners is that, while they have expressed a willingness for works to proceed, they have not yet provided the necessary evidence of funding, as required by the June Council decision. This is not to suggest that the works are unaffordable for these owners, but rather that officers require formal confirmation of financial readiness before proceeding in line with governance obtained at June Council. This verification process may take time to conclude. Should recovery of costs ultimately require legal action, this would place additional demands on both legal and housing staff, diverting resources from other essential Council priorities.
- 4.7. Following individual meetings officers wrote to a number of owners to offer further engagement, including the opportunity to meet with the Senior Manager (Housing) or to respond to specific queries to support their decision-making. In response, the owners have requested a meeting with the Strategic Director, which is scheduled to late for it to be featured in this report. Any changes in individual positions will be reported to Council accordingly.
- 4.8. The Chairman of the UK RAAC Campaign Group, Wilson Chowdhry, has contacted the Council regarding a proposed solution to strengthen RAAC. While this and other potential approaches may warrant further exploration, particularly in blocks where RAAC remains within tolerance, any such solution would require certification by a qualified engineer and approval from insurers before Building Control could consider it. Initial officer review has identified that the proposed product currently lacks British Board of Agrément certification and does not currently appear to hold relevant British Standards. These factors present significant barriers to approval and raise concerns about the viability of the solution.
- 4.9. Furthermore, the process of assessing alternative solutions could introduce additional delays and costs, with no guarantee of a certifiable or effective outcome. The Council's has a legally compliant procured current roofing contractor. This means, at present, the new solution proposed is not considered a legally viable option for the Council to explore.

Next Steps & Options

- 4.10. It is recognised that the current situation cannot continue indefinitely. While ongoing dialogue is welcomed, particularly where it is constructive and solution-focused, there is now a clear need for strengthened governance and commitment to help resolve matters. A number of residents have expressed concerns that they feel the Council's offer may not be fair. It is therefore important that the Council responds with clarity and purpose to support progress. In line with the governance already established, it will also be necessary for individual (owners) to come forward themselves, like the escrow suggestion, with proposals for consideration by the statutory officers.

- 4.11. Clackmannanshire continues to face significant pressure in relation to homelessness, both in terms of volume and associated costs. Moreover, the Council is also under obligation to meet the requirements of the Scottish Housing Regulator as detailed in our Engagement Plan, which highlights a need for the Council to “provide assurance that Clackmannanshire has a plan in place to finalise its asset management decisions for these properties.”
- 4.12. The Council cannot afford further delays that prevent the return of valuable public sector housing to operational use. It is also essential that the Council continues to demonstrate compliance with regulatory obligations. In addition, the current level of resource commitment is unsustainable, particularly given the wide range of strategic priorities and underlying actions that require attention across the organisation. A more decisive and structured approach is now needed to ensure progress and protect the interests of tenants and the wider community.

Tenements (Scotland) Act 2004 & Building (Scotland) Act 2003

- 4.13. One potential option is for the Council to formalise arrangements for the remaining blocks by supporting the formation of an owners’ association, of which the Council would also be a member. This group could revisit all available options, including assessing the feasibility of demolition versus repairs, or exploring whether any other cash buyer or investor might be interested. The association could also consider putting key decisions to a vote, with the Council’s vote delegated to an appropriate officer in line with the governance arrangements set out in this report. Even without a formal vote, the owners’ association could, for example, collectively agree that repair or remedial works are not feasible or financially viable.
- 4.14. Should that position be reached, and in line with the requirements of the Dangerous Building Notice (served on all owners, including the Council), representation would be made to Building Standards to advise that no repair or remedial action will be taken further forward.
- 4.15. Building Standards would then be required to determine the most appropriate course of action to make the buildings safe. Under the provisions of the Building (Scotland) Act 2003, this could include the power to demolish the buildings, thereby removing the risk they pose. The cost of any demolition would be shared among all owners. This does put the Council at risk legally, financially and capacity because the Council may have to go down the route of debt recovery for the relevant shares due. However, it is unlikely with the risk mitigations at present that Building control would proceed with this course of action.
- 4.16. Alternatively, a formal vote under the Tenements (Scotland) Act 2004 could be pursued, which provides a legal route for progressing repair works based on a simple majority. Given the Council’s majority ownership, this would likely result in a predetermined outcome, which could enable works to proceed.
- 4.17. While progressing works through a formal vote under the Tenements (Scotland) Act 2004 remains legally available, this approach carries risks of further delays, increased service pressures, and potential additional costs to the Housing Revenue Account.

Compulsory Purchase Order (CPO) & Cost Recovery Options

- 4.18. The Council remains committed to securing voluntary agreements with owners wherever possible. However, where this cannot be achieved, the use of Compulsory Purchase Order (CPO) powers remains an option. It is important to note that pursuing a CPO will incur additional costs, as external legal support will be required and funded from the HRA external legal budget, given the Council's majority ownership position. It may be necessary to review this funding approach for other blocks in the future.
- 4.19. Compulsory Purchase Order (CPO) is a legal process that allows the Council to acquire property or the interests in private property without the owner's agreement. The Scottish Government considers the powers to purchase land compulsorily to be an important tool for local authorities and other public bodies to use to acquire land (including buildings) to enable projects that are in the public interest to proceed where this would otherwise not be possible. A wide range of local authorities possess compulsory purchase powers relating to their purpose or functions i.e. to provide local roads, schools and housing.
- 4.20. Effort will continue to be made to reach voluntary agreement before committing to a CPO. This is not the Council's preferred route and would only be pursued if all other avenues are exhausted by the end of the current financial year.
- 4.21. Should voluntary agreement not be reached, a CPO would provide a clear and definitive pathway, ensuring all parties understand the Council's position. In such circumstances the Council may decide to focus resources on progressing the CPO and reviewing all associated costs, including those that may be recoverable from remaining owners. Owners should be reminded that compensation under a CPO is based on market value, which may be lower than the voluntary offers previously made by Council. Recent RICS valuations have recorded the market value of affected properties as £nil, due to the inability to secure mortgage lending.
- 4.22. The use of a CPO will inevitably have implications for the delivery timeline. It is unlikely that approval would be granted before the current roofing contract expires, which may require a review of the cost base previously shared with owners. However, it is possible that, with the withdrawal of in-kind support and the potential to acquire properties which could be at a value below the voluntary offer, the overall financial impact on the Council could be mitigated.
- 4.23. In the absence of further progress by the end of the financial year, considering the proposals detailed in this report. It is proposed that the Strategic Director of Place, in consultation with the Senior Manager (Legal & Governance), be granted authority to initiate a CPO for the evacuated properties if required. This approach is consistent with statutory powers available to Scottish local authorities where voluntary acquisition is not possible and there is a compelling case in the public interest. Other councils facing similar RAAC issues have also considered this route.
- 4.24. The key justifications include:

Regeneration and Redevelopment:

- 4.25. To assemble land for regeneration where fragmented ownership prevents progress, including revitalisation of town centres and improvement of housing stock.

Housing Delivery:

- 4.26. To acquire empty or substandard homes, enable new housing development, and support strategic housing investment plans.

Public Safety and Structural Integrity:

- 4.27. To address buildings that pose a risk to public safety, such as those affected by RAAC, where owner cooperation is lacking.
- 4.28. Officers are of the view that the criteria for pursuing Compulsory Purchase Orders (CPOs) has already been met but will seek further legal counsel on the matter. There are several potential legal routes available to progress a CPO, which may vary depending on the circumstances of the remaining blocks. Some of these options may require further reporting to Council, while others may be explicitly permitted under existing legislation, potentially allowing progression without a formal Council decision. Should Council approve this general approach, further engagement will be undertaken with external legal counsel to prepare the necessary documentation, including evidence of public benefit, owner engagement, and the rationale underpinning the voluntary offers made to date.
- 4.29. While some owners may not have anticipated this outcome, this would allow the Council to act to close down ongoing costs and secure the return of these properties to use. As detailed above, delays continue to accrue financial and operational impacts.
- 4.30. It is noted that some owners have raised the possibility of a CPO, potentially under the mistaken belief that it would trigger a broader public inquiry into RAAC. Officers are of the view that the inquiry element within the CPO process is limited to the Council's engagement and procedural compliance, not the wider RAAC issue. Owners should be aware that expectations of a broader investigation may not be realised.
- 4.31. As officers have continued to emphasise throughout this process, owners should seek out their own independent legal and financial advice in relation to matters raised and detailed in this report.

Conclusion

- 4.32. This report outlines the current position and sets out the process that can be followed going forward. It is evident that a resolution is needed to allow officers to refocus on core housing functions, and to formally consider the strategic approach for the remaining seven blocks affected by RAAC.
- 4.33. The intention by officers remains to progress and achieve voluntary engagement and the formation of an owners' association before the end of the financial year, could assist with that. A CPO would only be considered thereafter, unless there is a significant deterioration in the condition or structural integrity of the buildings.

- 4.34. Council is asked to designate the Strategic Director of Place as the Proper Officer for the purposes of the Housing (Scotland) Act 1987 and approve authority to them, in consultation with the Senior Manager (Legal and Governance), to progress the actions detailed in this report. These include continued voluntary engagement with owners, the potential establishment of an owners' association to formalise collaboration, consideration of voting mechanisms for decision-making, and if necessary, the authority to pursue a Compulsory Purchase Order (CPO).
- 4.35. This governance framework provides a clear pathway toward resolution for the remaining blocks, ensuring transparency, accountability, and a balanced approach to decision-making.

5.0 Sustainability Implications

- 5.1. The return of RAAC properties back into use will mean we help reduce embodied carbon.

6.0 Resource Implications

- 6.1. Financial Details

Finance have been consulted and have agreed the financial implications as set out in the report. Yes ☒

7.0 Exempt Reports

- 7.1. Is this report exempt? Yes ☐ (please detail the reasons for exemption below)
No ☒

8.0 Declarations

The recommendations contained within this report support or implement our Corporate Priorities and Council Policies.

- (1) **Our Priorities** (Please click on the check box ☒)

Clackmannanshire will be attractive to businesses and people and ensure fair opportunities for all ☐

Our families, children and young people will have the best possible start in life ☒

Women and girls will be confident and aspirational, and achieve their full potential ☐

Our communities will be resilient and empowered so that they can thrive and flourish ☒

- (2) **Council Policies**

Complies with relevant Council Policies Yes ☒

9.0 Equalities Impact

- 9.1. Have you undertaken the required equalities impact assessment to ensure that no groups are adversely affected by the recommendations?
Yes ☒ No ☐

10.0 Legality

- 10.1. It has been confirmed that in adopting the recommendations contained in this report, the Council is acting within its legal powers. Yes ☒

11.0 Appendices

Equality and Fairer Scotland Impact Assessment

12.0 Background Papers

- 12.1. Have you used other documents to compile your report? (All documents must be kept available by the author for public inspection for four years from the date of meeting at which the report is considered).
Yes ☒ No ☐
(please list the documents below)

Reinforced Autoclaved Aerated Concrete, Council, June 2025

Author(s)

NAME	DESIGNATION	TEL NO / EXTENSION
Murray Sharp	Senior Manager (Housing)	n/a
Lee Robertson	Senior Manager Legal & Governance	2087

Approved by

NAME	DESIGNATION	SIGNATURE
Kevin Wells	Strategic Director – Place	



Equality and Fairer Scotland Impact Assessment (EFSIA) Summary of Assessment

Title: Reinforced Autoclaved Aerated Concrete (RAAC) – Update

Name of your decision, activity, policy, strategy or proposal. Referred to throughout as 'proposal' in this document.

Key findings from this assessment (or reason why an EFSIA is not required):

- The proposal is a strategic decision aimed at addressing RAAC within Clackmannanshire Council's housing stock.
- It has relevance to multiple equality groups and individuals experiencing socio-economic disadvantage.
- The assessment found no risk of unlawful discrimination.
- The proposal supports increased access to affordable housing, particularly benefiting vulnerable groups such as young people, disabled individuals, single-parent households, and homeless persons.
- Engagement with affected owners has been central to the development of the proposal, with no indication that protected characteristics have influenced responses.

Summary of actions taken because of this assessment:

- Voluntary engagement with RAAC-affected owners has been prioritised, including offers of financial assessments and support for repairs or voluntary purchase.
- A trauma-informed, customer-focused approach has been adopted.
- Legal and financial advice has been encouraged for affected owners.
- The proposal to form an owners' association has been supported to facilitate collective decision-making.

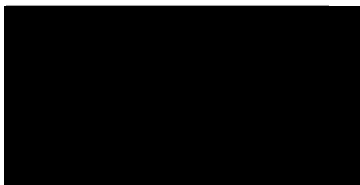
Ongoing actions beyond implementation of the proposal include:

- Continued monitoring of impacts through engagement with affected owners.
- Potential use of Compulsory Purchase Orders (CPOs) where voluntary agreement cannot be reached or building conditions deteriorate.
- Alignment with wider strategic housing planning
- Review and update of the EFSIA as necessary in response to emerging needs or impacts.

Lead person(s) for this assessment:

Monika Bicev

Senior officer approval of assessment:



DATE: 23/09/2025

Equality and Fairer Scotland Impact Assessment (EFSIA)

An Equality and Fairer Scotland Impact Assessment (EFSIA) must be completed in relation to any decisions, activities, policies, strategies or proposals of the Council (referred to as 'proposal' in this document). The first stage of the assessment process will determine the level of impact assessment required.

This form should be completed using the guidance contained in the document: ['NAME']. Please read the guidance before completing this form.

The aim of this assessment is to allow you to critically assess:

- the impact of the proposal on those with protected characteristics and, where relevant, affected by socio-economic disadvantage (referred to as 'equality groups' in this document);
- whether the Council is meeting its legal requirements in terms of Public Sector Equality Duty and the Fairer Scotland Duty;
- whether any measures need to be put in place to ensure any negative impacts are eliminated or minimised.

The Fairer Scotland Duty requires public authorities to pay 'due regard' to how they can reduce inequalities of outcome caused by socio-economic disadvantage, when making **strategic decisions**. Strategic decisions are key, high-level decisions such as decisions about setting priorities, allocating resources, delivery or implementation and commissioning services and all decisions that go to Council or committee for approval.

Step A – Confirm the details of your proposal

1. Describe the aims, objectives and purpose of the proposal.

The primary aim of this proposal is to provide Clackmannanshire Council with an update on the engagement and governance arrangements for addressing Reinforced Autoclaved Aerated Concrete (RAAC) within the Council's housing stock, as agreed at the Council meeting in June 2025. The proposal seeks further governance approval to enable officers to progress essential actions and avoid any impasse that could delay the remediation or regeneration of affected blocks and surrounding areas.

Ultimately, the purpose of the proposal is to ensure there is a clear way forward for the regeneration and redevelopment of RAAC-affected properties. By enabling the delivery of safe, high-quality housing and protecting the structural integrity of Council-owned buildings, the proposal seeks to safeguard public safety, support community wellbeing, and contribute to the Council's wider housing and regeneration objectives.

2. Why is the proposal required?

The proposal is required to clearly set out and update on the Housing Service's position in relation to RAAC-affected and to determine a strategic way forward for these properties. It is essential to establish a coordinated approach that enables the Council to progress with necessary actions.

The proposal also supports ongoing voluntary engagement with property owners, including the potential establishment of an owners' association to formalise collaboration. In circumstances where no further progress can be made with owners, or where there is a significant deterioration in the condition or structural integrity of the buildings, the proposal seeks authority to pursue a Compulsory Purchase Order (CPO) as a last resort. This comprehensive approach is vital to safeguard residents, protect public assets, and ensure the long-term sustainability of the Council's housing stock.

3. Who is affected by the proposal?

The proposal primarily affects other owners within RAAC-affected blocks and the tenants who previously resided in these blocks and wish to return. Individuals in need of affordable housing options and homeless households requiring accommodation may also be affected, especially where the regeneration of RAAC-affected blocks could contribute to increased housing supply. As such, the proposal is critical in establishing a clear way forward for these properties, ensuring that their future use can support wider housing needs across Clackmannanshire.

4. What other Council policies or activities may be related to this proposal? The EFSIAs for related policies might help you understand potential impacts.

While the RAAC paper does not have any directly related Council policies or activities, there are several strategic documents that may be relevant to its aims and implementation. The Strategic Housing Investment Plan (SHIP) is particularly pertinent, as it helps determine housing investment opportunities and supports the increase of affordable housing supply. Additionally, Clackmannanshire's Housing Need and Demand Assessment provides valuable data on housing pressures across the area, which can help contextualise the need for action on RAAC blocks and inform future planning. These related strategies and assessments offer important context for understanding the wider impacts and opportunities associated with the RAAC proposal.

5. Is the proposal a strategic decision? If so, please complete the steps below in relation to socio-economic disadvantage. If not, please state why it is not a strategic decision:

Yes, this proposal constitutes a strategic decision. It sets out the Council's approach to determining a way forward for RAAC-affected blocks, with significant implications for public safety, housing delivery, and long-term investment planning. The proposal supports the regeneration and potential redevelopment of affected properties, which may contribute to increasing the supply of affordable and accessible housing across Clackmannanshire. As such, it has the potential to impact individuals experiencing socio-economic disadvantage and requires a full Equality and Fairer Scotland Impact Assessment to ensure that these impacts are fully considered and addressed.

Step B – Consider the level of EFSIA required

You should consider the available evidence and data relevant to your proposal. You should gather information in order to:

- help you to understand the importance of your proposal for those from equality groups,
- inform the depth of EFSIA you need to do (this should be proportionate to the potential impact), and
- provide justification for the outcome, including where it is agreed an EFSIA is not required.

6. What information is available about the experience of those with protected characteristics in relation to this proposal? Does the proposal relate to an area where there are already known inequalities? Refer to the guidance for sources of evidence and complete the table below.

Equality Group	Evidence source (e.g. online resources, report, survey, consultation exercise already carried out)	What does the evidence tell you about the experiences of this group in relation to the proposal? NB Lack of evidence may suggest a gap in knowledge/ need for consultation (Step C).
Age	Scottish Census 2022 Poverty and Income Inequality in Scotland 2017-2019 People Community Wellbeing Plan 2024-25	<u>RAAC-affected owners</u> Data is not currently held on the age of owners directly affected by RAAC in Clackmannanshire. However, engagement with affected owners suggests the majority are middle-aged, with a small number of retired individuals. None have indicated that age is a factor in relation to the proposals set out in the RAAC paper, and national data does not suggest a direct age-related impact from the proposals. <u>Broader groups</u>

Equality Group	Evidence source (e.g. online resources, report, survey, consultation exercise already carried out)	What does the evidence tell you about the experiences of this group in relation to the proposal? NB Lack of evidence may suggest a gap in knowledge/ need for consultation (Step C).
	Scottish Household Survey 2019 National Records of Scotland Draft Housing Need and Demand Assessment 2025 Scottish Government Homelessness Returns Scottish Surveys Core Questions 2019 Wealth in Scotland 2006-2022	<p>More broadly, Scottish Census 2022 data shows that 29% of individuals living in the social rented sector across Clackmannanshire are aged 0–15, followed by 25% aged 50–64 and 23% aged 35–49. Nationally, children and younger adults are more likely to experience relative poverty after housing costs compared to older adults. Between 2017–2020, 28% of children aged 0–4 and 28% of adults aged 16–24 were living in relative poverty, compared to 15% of adults aged 65 and over.</p> <p>Homelessness data also highlights that the majority of homeless households in Clackmannanshire are young single males aged 25–34. This group is particularly vulnerable to housing insecurity and would benefit from any interventions that bring RAAC-affected properties back into use, especially where remediation enables the creation of more affordable social housing options.</p> <p>In contrast, nationally, research shows that households whose highest income householder (HIH) is aged 60 years or older have had continuously higher rates of owner-occupation since 2009.</p> <p>As such, evidence indicates young people are particularly vulnerable to housing insecurity and would benefit from interventions that bring empty RAAC properties back into use. Progressing with remediation works and creating more affordable social housing options could help address these inequalities and improve outcomes for these groups.</p>
Disability	Scottish Surveys Core Questions 2019 Scottish Census 2022 Scottish House Condition Survey 2017-2019 Draft Housing Need and Demand Assessment 2025	<p><u>RAAC-affected owners</u></p> <p>No data has been collected from RAAC-affected owners regarding disability status, and none have indicated that the proposals would impact them in relation to disability.</p> <p><u>Broader groups</u></p> <p>However, wider data shows that 24% of individuals in Clackmannanshire's social rented sector report having a long-term illness, disease, or condition, and 10% report a mental health condition. At the household level, 58% of social rented households include at least one person with a long-term sickness or disability.</p> <p>National research consistently shows higher poverty rates among households that include a disabled person. As such, progressing with remediation and regeneration of RAAC-affected properties could benefit this group by increasing access to affordable and suitable housing. Conversely, inaction would risk limiting housing opportunities for disabled individuals and exacerbate existing inequalities.</p>

Equality Group	Evidence source (e.g. online resources, report, survey, consultation exercise already carried out)	What does the evidence tell you about the experiences of this group in relation to the proposal? NB Lack of evidence may suggest a gap in knowledge/ need for consultation (Step C).
Race	Scottish Census 2022 National Records of Scotland	<p><u>RAAC-affected owners</u></p> <p>No data is collected on the race or ethnicity of RAAC-affected owners, and none have indicated that the proposals would impact them in relation to this protected characteristic.</p> <p><u>Broader groups</u></p> <p>Clackmannanshire's population is predominantly White (94.5%), with minority ethnic groups making up a small proportion of the population, with 2.1% identifying as Asian and 1.1% as African.</p> <p>Nationally, minority ethnic groups are more likely to experience housing affordability and insecurity, often being overrepresented in the private rented sector. While the direct impact on minority ethnic groups locally is likely to be limited, proposals that increase the supply of affordable and secure housing could help reduce inequalities of outcome and improve access to suitable accommodation for these groups.</p>
Sex	Scottish Census 2022 Draft Housing Need and Demand Assessment 2025 Scottish Government Homelessness Returns	<p><u>RAAC-affected owners</u></p> <p>No data has been collected on the sex of RAAC-affected owners, though the general split is approximately 50/50. None have indicated that the proposals would impact them based on this protected characteristic.</p> <p><u>Homeless households</u></p> <p>However, homelessness data shows that younger men are disproportionately affected by housing insecurity in Clackmannanshire. In 2023/24, the area recorded the third-highest rate of homelessness presentations in Scotland, with the majority of applicants being young single male households aged 25–34. These individuals typically spend extended periods in temporary accommodation, indicating significant housing need.</p> <p>Proposals to regenerate or bring RAAC-affected properties back into use could help alleviate homelessness pressures, particularly for single-person households, and contribute to increasing the supply of affordable housing—benefiting this group directly.</p> <p><u>Women-led households</u></p> <p>In contrast, national poverty data shows that single women with children are among the most economically disadvantaged groups, with approximately 38% of such households living in relative poverty. Between 2017–2020, 20% of single female pensioners and 17% of single male</p>

Equality Group	Evidence source (e.g. online resources, report, survey, consultation exercise already carried out)	What does the evidence tell you about the experiences of this group in relation to the proposal? NB Lack of evidence may suggest a gap in knowledge/ need for consultation (Step C).
		<p>pensioners were also living in relative poverty after housing costs. This evidence indicates that both single male and single female households, and lone-parent families in particular, are likely to be affected by the proposals.</p> <p>Women, especially those with children, are more likely to experience housing-related poverty and would benefit from investment in affordable housing and initiatives aimed at improving housing security and stability. This includes proposals made within the paper to move forward with the works to bring RAAC properties back into use.</p>
Gender Reassignment	Scottish Census 2022 Poverty and Income Inequality in Scotland 2017-2019	<p><u>RAAC-affected owners</u></p> <p>No data is collected on transgender status of RAAC-affected owners, and none have indicated that the proposals would impact them in relation to this protected characteristic.</p> <p><u>Broader groups</u></p> <p>The Scottish Census (2022) reports that 0.44% of people aged 16 and over in Scotland identify as transgender, with Clackmannanshire's rate slightly lower at 0.35%, representing approximately 151 individuals.</p> <p>While the absence of data does not imply that transgender individuals do not face housing-related challenges, the relatively small size of this population group in Clackmannanshire suggests that this proposal is unlikely to have a direct or disproportionate impact on them. Nevertheless, any solutions that increase affordable housing supply or bring RAAC-affected properties back into use would benefit all individuals in housing need, including those who identify as transgender.</p>
Sexual orientation	Scottish Census 2022 Poverty and Income Inequality in Scotland 2017-2019	<p><u>RAAC-affected owners</u></p> <p>No data is collected on transgender status of RAAC-affected owners, and none have indicated that the proposals would impact them in relation to this protected characteristic.</p> <p><u>Broader groups</u></p> <p>According to the 2022 Census, 1,343 individuals (3.12%) aged 16 and over in Clackmannanshire identify as LGB+.</p> <p>There is currently no available local or national data on the proportion of LGB+ individuals experiencing financial hardship or housing insecurity. While the absence of data does not imply that LGB+ individuals do not face housing-</p>

Equality Group	Evidence source (e.g. online resources, report, survey, consultation exercise already carried out)	What does the evidence tell you about the experiences of this group in relation to the proposal? NB Lack of evidence may suggest a gap in knowledge/ need for consultation (Step C).
		<p>related challenges, the relatively small size of this population group in Clackmannanshire suggests that this proposal is unlikely to have a direct or disproportionate impact on them. Nevertheless, any solutions that increase affordable housing supply or bring RAAC-affected properties back into use would benefit all individuals in housing need, including those who identify as LGB+, as well as owners directly affected by the RAAC situation.</p>
Religion or Belief	Scottish Census 2022 Poverty and Income Inequality in Scotland 2017-2019	<p><u>RAAC-affected owners</u> No data is collected for RAAC-affected owners in relation to religion or belief, and it is unlikely that the proposals would impact owners based on this protected characteristic.</p> <p><u>Broader groups</u> National data indicates that Muslim adults are disproportionately affected by relative poverty after housing costs, with 52% living in poverty compared to 18% of adults overall.</p> <p>However, the very small population of Muslims living in Clackmannanshire suggests that the proposals are unlikely to have a direct or disproportionate impact on this group. The proposals are not expected to affect individuals based on religion or belief.</p>
Pregnancy or maternity	Scottish Census 2022 Poverty and Income Inequality in Scotland 2017-2019 People Community Wellbeing Plan 2024-25	<p><u>RAAC-affected owners</u> No data is collected in relation to pregnancy or maternity status of RAAC-affected owners, and none have indicated that the proposals would impact them in relation to this protected characteristic.</p> <p><u>Broader groups</u> National data shows that single women with children experience the highest rates of relative poverty in Scotland, with 38% of such households living in poverty after housing costs. Between 2021 and 2024, there was a 41.1% increase in the number of single parents claiming Universal Credit, highlighting growing financial pressures on this group.</p> <p>Given the material deprivation and economic vulnerability experienced by single mothers, this protected group is likely to be positively impacted by the proposals. By focusing on bringing empty RAAC-affected properties back into use and restoring them to a habitable standard, the proposal would increase the supply of affordable housing, directly supporting efforts to alleviate poverty and improve housing stability for families with children.</p>

Equality Group	Evidence source (e.g. online resources, report, survey, consultation exercise already carried out)	What does the evidence tell you about the experiences of this group in relation to the proposal? NB Lack of evidence may suggest a gap in knowledge/ need for consultation (Step C).
Marriage or civil partnership (only the first aim of the Duty is relevant to this protected characteristic and only in relation to work matters)		Not applicable, not an employment matter.
Socio economic disadvantage (if required)	Scottish Census 2022 Poverty and Income Inequality in Scotland 2017-20 People Community Wellbeing Plan 2024-25 Scottish Household Survey 2019 National Records of Scotland Draft Housing Need and Demand Assessment 2025 Scottish Government Homelessness Returns	<p><u>RAAC-affected Owners</u></p> <p>Full financial details are not known for RAAC-affected owners, though some are retired and others are still working. Owners have been offered free financial assessments by the Housing Service to explore options, with some already agreeing to voluntary sale or to proceed with repairs, demonstrating the ability to fund works.</p> <p>National research and evidence suggests owner-occupiers are generally less likely to experience socio-economic disadvantage, but the substantial costs of repairs mean that any proposed solution will have a direct and significant impact on affected owners, especially those less willing or able to engage.</p> <p><u>Broader groups</u></p> <p>Clackmannanshire as a whole experiences higher-than-average levels of deprivation, with 25% of SIMD datazones in the most deprived 20% nationally.</p> <p>The youngest age groups are disproportionately represented in the most deprived areas, indicating a strong link between age and socio-economic disadvantage locally.</p> <p>According to the 2022 Census, Clackmannanshire had 24,072 households, with 63% owner-occupied, 8.9% privately rented, and 27% socially rented. The Scottish Household Survey (2019) shows that 47% of socially rented households are located in the most deprived areas, compared to 17% of privately rented and 12% of owner-occupied households.</p> <p>Overall, proposals to bring RAAC-affected properties back into use and increase affordable housing supply would have a direct and positive impact on groups experiencing socio-economic disadvantage, helping to reduce inequalities of outcome caused by poverty and deprivation. The proposals also support the Council's duty to protect public finances and tenants' interests.</p>

- 7. Based on the evidence above, is there relevance to some or all of the equality groups? Yes**
If yes or unclear, proceed to further steps and complete full EFSIA
If no, explain why below and then proceed to Step E:

Step C – Stakeholder engagement

This step will help you to address any gaps in evidence identified in Step B. Engagement with people who may be affected by a proposal can help clarify the impact it will have on different equality groups. Sufficient evidence is required for you to show 'due regard' to the likely or actual impact of your proposal on equality groups.

- 8. Based on the outcome of your assessment of the evidence under Step B, please detail the groups you intend to engage with or any further research that is required in order to allow you to fully assess the impact of the proposal on these groups. If you decide not to engage with stakeholders, please state why not:**

Stakeholder engagement has been undertaken with the owner-occupiers directly affected by RAAC. This engagement forms the core of the proposal and is ongoing, conducted on an individual basis to ensure tailored proposals of support and most viable outcomes. While protected characteristics are considered in general, no owners have indicated that these characteristics have influenced their engagement or response to the proposals.

Engagement has also taken place or is planned to take place with external professional bodies, including legal counsel, to ensure that all actions taken are legally sound and that no group is unduly discriminated against.

No further engagement is planned with other groups, as this is not considered relevant to the scope of the proposal. The Housing Service's focus is on enabling a way forward for RAAC-affected blocks while minimising the use of financial, staffing, and operational resources. The aim is to restore affected homes to a habitable standard or explore alternative options with the aim of increasing the supply of accessible and affordable housing, and/or bringing properties back into use.

- 9. Please detail the outcome of any further engagement, consultation and/or research carried out:**

Step D - Impact on equality groups and steps to address this

10. Consider the impact of the proposal in relation to each protected characteristic under each aim of the general duty:

- Is there potential for discrimination, victimisation, harassment or other unlawful conduct that is prohibited under the Equality Act 2010? How will this be mitigated?
- Is there potential to advance equality of opportunity between people who share a characteristic and those who do not? How can this be achieved?
- Is there potential for developing good relations between people who share a relevant protected characteristic and those who do not? How can this be achieved?

If relevant, consider socio-economic impact.

Age	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination			X	The proposals made within this RAAC update do not present a risk of discrimination based on age. The approach is collaborative and applies equally to all affected owners. No evidence suggests that age has influenced how individuals are impacted by or engaged with the proposals.
potential for developing good relations			X	There is no indication that the proposals affect the potential for developing good relations, either among affected owners or the wider public. The Housing Service continues to engage transparently to support trust and understanding.
potential to advance equality of opportunity	X			By exploring options to bring RAAC-affected properties back into use, the proposals may increase access to affordable housing. This is particularly beneficial for younger people and homeless individuals, groups more likely to experience housing insecurity. No adverse impact is expected for RAAC-affected owners.

Disability	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination			X	There is no indication that the proposals present a risk of discrimination in relation to disability. This applies both to households requiring affordable housing and to RAAC-affected owner-occupiers. The Housing Service continues to engage transparently and equitably to determine the best way forward for all affected parties.
potential for developing good relations			X	There is no indication that the proposals affect the potential for developing good relations, either among affected owners or the wider public. The Housing Service continues to engage transparently to support trust and understanding.
potential to advance equality of opportunity	X			There is no indication that RAAC-affected owners would be directly impacted in relation to disability.

				<p>However, by exploring opportunities to bring RAAC-affected properties into social housing use or enhancing redevelopment, the proposals would increase the supply of affordable housing.</p> <p>Evidence shows that disabled individuals are more likely to experience poverty and would benefit from improved access to affordable, suitable homes. The proposals in this paper enable these opportunities and support equality of opportunity for disabled people in housing need</p>
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Race	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination			X	Given the demographic profile of Clackmannanshire, it is unlikely that this proposal will have a direct or indirect impact on this protected characteristic.
potential for developing good relations			X	Given the demographic profile of Clackmannanshire, it is unlikely that this proposal will have a direct or indirect impact on this protected characteristic.
potential to advance equality of opportunity			X	Given the demographic profile of Clackmannanshire, it is unlikely that this proposal will have a direct or indirect impact on this protected characteristic.

Sex	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination	X			<p>For RAAC-affected owners, it is unlikely that any proposals will impact this protected characteristic.</p> <p>However, the proposal seeks to indirectly increase the supply of affordable and accessible housing.</p> <p>Homelessness data shows that young, single male adults are most affected, and these proposals will increase provision for this group. National poverty data also highlights that single female-led parent households are among the most economically disadvantaged. By progressing works at pace, the needs of women are not overlooked.</p> <p>These targeted efforts help mitigate the risk of sex-based discrimination and ensure that housing provision reflects the needs of both male and female households.</p>
potential for developing good relations			X	<p>There is no indication that the proposals affect the potential for developing good relations, either among affected owners or the wider public. The Housing Service continues to engage transparently to support trust and understanding.</p>
potential to advance equality of opportunity	X			<p>For RAAC-affected owners, it is unlikely that proposals will impact this characteristic.</p> <p>However, the proposals offer a way to develop affordable housing options for those in need. Evidence shows that single-parent households are often female-led, while most homeless households are male-adult.</p> <p>By advancing options to bring properties back into use, the paper aims to increase affordable social housing and advance equality of opportunity by ensuring both male and female households, especially those experiencing poverty or housing insecurity have access to safe, secure, and affordable homes.</p>

Gender Reassignment	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination			X	<p>Given the demographic profile of Clackmannanshire, it is unlikely that this proposal will have a direct or indirect impact on this protected characteristic.</p>

potential for developing good relations			X	Given the demographic profile of Clackmannanshire, it is unlikely that this proposal will have a direct or indirect impact on this protected characteristic.
potential to advance equality of opportunity			X	Given the demographic profile of Clackmannanshire, it is unlikely that this proposal will have a direct or indirect impact on this protected characteristic.

Sexual Orientation	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination			X	Given the demographic profile of Clackmannanshire, it is unlikely that this proposal will have a direct or indirect impact on this protected characteristic.
potential for developing good relations			X	Given the demographic profile of Clackmannanshire, it is unlikely that this proposal will have a direct or indirect impact on this protected characteristic.
potential to advance equality of opportunity			X	Given the demographic profile of Clackmannanshire, it is unlikely that this proposal will have a direct or indirect impact on this protected characteristic.

Religion or Belief	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination			X	Given the demographic profile of Clackmannanshire, it is unlikely that this proposal will have a direct or indirect impact on this protected characteristic.
potential for developing good relations			X	Given the demographic profile of Clackmannanshire, it is unlikely that this proposal will have a direct or indirect impact on this protected characteristic.
potential to advance equality of opportunity			X	Given the demographic profile of Clackmannanshire, it is unlikely that this proposal will have a direct or indirect impact on this protected characteristic.

Pregnancy/maternity	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination			X	There is no indication that the proposals present a risk of discrimination in relation to pregnancy/maternity. This applies both to households requiring affordable housing and to RAAC-affected owner-occupiers. The Housing Service continues to engage transparently and equitably to determine the best way forward for all affected parties.
potential for developing good relations			X	There is no indication that the proposals affect the potential for developing good relations, either among affected owners or the wider public. The Housing Service continues to engage transparently to support trust and understanding.
potential to advance equality of opportunity	X			<p>For RAAC-affected owners, it is unlikely that any proposals will impact this protected characteristic.</p> <p>However, by seeking to progress with RAAC-related activities the proposals aim to increase the availability of accessible and affordable housing locally. Evidence suggests that single female-led households are more likely to experience poverty and financial hardship.</p> <p>As such, this group would benefit from increased access to secure, appropriate, and sustainable accommodation, supporting efforts to alleviate poverty and improve housing stability for families with children.</p>

Marriage/civil partnership	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Positive impacts	Negative impacts	No impact	
risk of discrimination (only the first aim of the Duty is relevant to this protected characteristic and only in relation to work matters)			X	Not applicable, not an employment matter.

Socio-economic disadvantage	Place 'X' in the relevant box(es)			Describe any actions you plan to take, eg. to mitigate any impact, maximise positive impact, or record your justification to not make changes
	Yes	No	No	

			impact	
(If required) Will the proposal reduce inequalities of outcome caused by socio-economic disadvantage?	X			<p>The Housing Service recognises the significant and complex impact that the discovery of RAAC has had on affected owners, many of whom now face uncertainty and potential financial hardship. Every potential option, be it voluntary purchase, agreement to proceed with repairs, or compulsory purchase, carries implications for the financial and personal circumstances of these owners. The Service has consistently adopted a customer-focused, trauma-informed approach, prioritising support and dedicating substantial financial and operational resources to assist private owners throughout the process.</p> <p>To mitigate socio-economic disadvantage, the Housing Service has maintained transparency in all dealings with RAAC-affected owners, ensuring that all options are fully explored and communicated.</p> <p>Extensive time has been given to voluntary engagement, including offers for voluntary purchase and support for repairs. Owners have been offered free financial assessments to help them understand their options and make informed decisions. Where repairs are chosen, a 15-year repayment plan is available to ease financial pressure. For those opting to sell, the voluntary purchase offer has been refined to provide targeted assistance, particularly where early mortgage repayment is a barrier. The offer also includes writing off previously provided support (around £5,000), and proposals allow the Section 95 officer to recharge costs if owners do not legally commit to voluntary opportunities.</p> <p>To further support collective action, the Service has encouraged the formation of an owners' association, enabling owners to collaborate and agree on a way forward. Where voluntary agreement cannot be reached, a compulsory purchase order may be pursued as a last resort, or if the building's condition significantly deteriorates. In such cases, the market value of affected properties may be recorded as nil, and owners have been advised to seek independent financial and legal advice.</p> <p>Throughout, the Service's determination to resolve the RAAC situation aligns with wider SHIP-related activities, aiming to bring properties back into use, increase redevelopment opportunities, and ultimately expand the supply of affordable and accessible housing. These actions are designed to benefit individuals and households experiencing socio-economic disadvantage, while also balancing the need to protect public finances and tenants'</p>

				interests.
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11. Describe how the assessment might affect the proposal or project timeline?

Examples of the items you should consider here include, but are not limited to:

- **Communication plan:** do you need to communicate with people affected by proposal in a specific format (e.g. audio, subtitled video, different languages) or do you need help from other organisations to reach certain groups?
- **Cost:** do you propose any actions because of this assessment which will incur additional cost?
- **Resources:** do the actions you propose require additional or specialist resource to deliver them?
- **Timing:** will you need to build more time into the project plan to undertake research, consult or to complete any actions identified in this assessment?

The EFSIA itself is not expected to delay or adversely affect the overall project timeline. Significant time and effort have already been invested in ensuring robust communication and ongoing engagement with RAAC-affected owners, which has been central to the development of the proposal and the pursuit of the best possible outcomes for all parties involved.

The assessment process has helped to formalise and document the Council's approach to equality and socio-economic considerations, but it has run in parallel with ongoing project planning and stakeholder engagement. The proposal specifically aims to mitigate any further delays by providing a clear governance route and authority to proceed with necessary remediation works as soon as possible.

Any future development or regeneration opportunities that may arise from the remediation of RAAC-affected blocks will be considered as part of wider strategic discussions and planning. These may be subject to further assessment and engagement as appropriate, but the current EFSIA process is designed to support timely decision-making and minimise any risk of impasse or unnecessary delay.

12. **Having considered the potential or actual impacts of your proposal, you should now record the outcome of this assessment.** Choose from one of the following:

Please select (X)	Implications for the proposal
X	No major change Your assessment demonstrates that the proposal shows no risk of unlawful discrimination and that you have taken all opportunities to advance equality of opportunity and foster good relations, subject to continuing monitoring and review.
	Adjust the proposal and/or implement mitigations You have identified ways of modifying the proposal to avoid discrimination or to better advance equality of opportunity or foster good relations. In addition, or alternatively, you will introduce measures to mitigate any negative impacts. Adjustments and mitigations should be recorded in the tables under Step D above and summarised in the summary sheet at the front of the document.
	Continue the proposal with adverse impact The proposal will continue despite the potential for adverse impact. Any proposal which results in direct discrimination is likely to be unlawful and should be stopped and advice taken. Any proposal which results in indirect discrimination should be objectively justified and the basis for this set out in the tables under Step D above and summarised in the summary sheet at the front of the document. If objective justification is not possible, the proposal should be stopped whilst advice is taken.
	Stop the proposal The proposal will not be implemented due to adverse effects that are not justified and cannot be mitigated.

Step E - Discuss and review the assessment with decision-makers

13. **You must discuss the findings of this assessment at each stage with senior decision makers during the lifetime of the proposal and before you finalise the assessment. Record details of these discussions and decisions taken below:**

Step F – Post-implementation actions and monitoring impact

It is important to continue to monitor the impact of your proposal on equality groups to ensure that your actual or likely impacts are those you recorded. This will also highlight any unforeseen impacts.

14. **Record any post-implementation actions required.**

15. **Note here how you intend to monitor the impact of this proposal on equality groups.**

The impact of this proposal will be monitored through ongoing engagement with the RAAC-affected owner groups, which remains central to the delivery of the proposal. This engagement will help identify any emerging issues or unintended consequences for individuals with protected characteristics. Further monitoring may also form part of wider strategic housing discussions.

16. **Note here when the EFSIA will be reviewed as part of the post-implementation review of the proposal:**

The EFSIA will be continuously monitored as part of any ongoing or future RAAC-related activity. This includes any update reports, governance decisions, or additional actions undertaken in relation to the RAAC-affected blocks that have to be put forward to the Council. Where relevant, the assessment may also be revisited and reviewed in line with wider strategic housing discussions to ensure it remains responsive to emerging needs and impacts.

Step G – Assessment sign off and approval

Lead person(s) for this assessment: Monika Bicev

Signed: MBicev

Date: 22/9/2025

Senior officer approval of assessment:



Signed:

Date: 23/09/2025

All full EFSIAs must be published on the Council's website as soon as possible after the decision is made to implement the proposal.