

Cambridge City Council Equality Impact Assessment (EqIA)

This tool helps the Council ensure that we fulfil legal obligations of the [Public Sector Equality Duty](#) to have due regard to the need to –

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Guidance on how to complete this tool can be found on the Cambridge City Council intranet. For specific questions on the tool email Helen Crowther, Equality and Anti-Poverty Officer at equalities@cambridge.gov.uk or phone 01223 457046.

Once you have drafted the EqIA please send this to equalities@cambridge.gov.uk for checking. For advice on consulting on equality impacts, please contact Graham Saint, Strategy Officer, (graham.saint@cambridge.gov.uk or 01223 457044).

1. Title of strategy, policy, plan, project, contract or major change to your service
Local Lettings Plan: Ironworks, Mill Road

2. Webpage link to full details of the strategy, policy, plan, project, contract or major change to your service (if available)
https://www.cambridge.gov.uk/media/8246/local-lettings-policy.pdf

3. What is the objective or purpose of your strategy, policy, plan, project, contract or major change to your service?
Ironworks, Mill Road is a new mixed tenure housing development in the centre of Cambridge City. In line with our Local Lettings Plan (LLP) policy, an LLP is being introduced for the first lettings only of the new development in order to create a balanced, sustainable community that can help complement the wider community. It also aims to: <ul style="list-style-type: none">• Help minimise need for private vehicle journeys to work by giving some priority to people working locally• Free up existing council and housing association homes for others on the register through priority given to existing tenants.• Support the needs of people needing wheelchair accessible housing by giving priority to those who need them

- Help tackle rough sleeping by allocating homes to rough sleepers under the Housing First model
- Ensure successful applicants are able to afford the rents being charged

4. Responsible service

Housing

5. Who will be affected by this strategy, policy, plan, project, contract or major change to your service?

(Please tick all that apply)

- Residents
 Visitors
 Staff

Please state any specific client group or groups (e.g. City Council tenants, tourists, people who work in the city but do not live here):

Primarily this policy will affect City Council applicants as it determines who will be eligible for the new affordable housing being built as part of a development. It will particularly benefit:

- Those working in Cambridge
- Existing council and housing association tenant applicants who wish to move to the area
- Other applicants who are waiting for homes elsewhere to become available
- Those needing wheelchair accessible or adaptable homes
- Rough sleepers seeking more permanent accommodation

It should also impact positively on other residents on and around the development as it is aimed at helping to build a mixed and sustainable community.

6. What type of strategy, policy, plan, project, contract or major change to your service is this?

- New
 Major change
 Minor change

7. Are other departments or partners involved in delivering this strategy, policy, plan, project, contract or major change to your service? (Please tick)

- Yes
 No

If 'Yes' please provide details below:

Housing Services, including: City Homes; Housing Advice; Housing Strategy. Housing Finance. External partners: Occupational Therapy service.

8. Has the report on your strategy, policy, plan, project, contract or major change to your service gone to Committee? If so, which one?

No

9. What research methods/ evidence have you used in order to identify equality impacts of your strategy, policy, plan, project, contract or major change to your service?

- National and local equalities data
- Housing register data
- Local Housing Allowance rates
- A knowledge of the pressures facing Local Authority (LA) housing registers and a gap in people who are able to access affordable housing.

10. Potential impacts

For each category below, please explain if the strategy, policy, plan, project, contract or major change to your service could have a positive/ negative impact or no impact. Where an impact has been identified, please explain what it is. Consider impacts on service users, visitors and staff members separately.

(a) Age

Older people POSITIVE AND NEGATIVE IMPACT

There is a potential negative impact on older people as people working locally will have priority for around one third of allocations. However, although the majority of people working will be of traditional 'working age', employment amongst people aged 65 and over who are in work are increasing. The proportion doubled nationally between 1992 and 2016; from 5.5% to 10.4% ¹

However, this is partly offset by around two thirds of allocations being available to people of any age group.

Working age people POSITIVE AND NEGATIVE IMPACT

Giving some priority to those working locally will have a positive impact on those of working age who are employed and may not usually be able to access affordable housing.

¹ ONS Five Facts about older people at work, 2016:
<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/articles/fivefactsaboutolderpeopleatwork/2016-10-01>

Although at the same time it could negatively impact on this age group if the Covid-19 pandemic leads to a number of people losing their jobs. It could also impact people in narrower age bands if such unemployment impacts on particular sectors- eg in which younger people are traditionally employed. ²

THERE ARE NO SAFEGUARDING IMPLICATIONS FOR ADULTS OR CHILDREN

(b) Disability

POSITIVE AND NEGATIVE IMPACT

- Census data suggests that around 13% of residents in Cambridge and 13.9% of residents in South Cambridgeshire have a long-term activity limiting illness.
- Around 2% of the UK population are wheelchair users, and around 15% of households containing at least one wheelchair user feel that their current home is not suitable for their needs, and needs adaptations. ³
- There are 22 applicants on the council's housing register requiring 'mobility 1' (wheelchair accessible) housing
- Around one third of disabled people nationally are of working age. As a result of unmet housing needs, disabled people are 4 times more likely to be unemployed or not seeking work. (Papworth 2018) ⁴
- Disabled people are twice as likely than non disabled people to be social housing tenants. For example, Papworth reports that in 2015-16, 49% of households in the social rented sector included someone with a long term illness or disability. In 2011 around 24% of individuals living in social housing in Cambridge had a long-term health problem or disability. (Census 2011)
- Nationally, disability was the main motivation for 8% of hate crime offences recorded during 2018/19 ⁵
- Mental Health
- Various pieces of research have identified the positive impacts of pets on people's mental health.

The Local Lettings Plan should support people with disabilities by:

- Ensuring that people who need wheelchair accessible housing are given first priority for those homes through an Occupational Therapy assessment
- Letting homes at affordable rents at 2019/20 Local Housing Allowance rates rather than 2020/21 rates.
- Prioritising one third of lettings for existing social housing tenants

² ONS Coronavirus and the social impacts on young people in Great Britain, 2020:

<https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/ageing/articles/coronavirusandthesocialimpactsonyoungpeopleingreatbritain/3aprilto10may2020>

³ Papworth Trust, Disability in the United Kingdom 2016

⁴ Papworth Trust, Facts & figures 2018: <https://www.papworthtrust.org.uk/about-us/publications/papworth-trust-disability-facts-and-figures-2018.pdf>

⁵ Government hate crime statistics 2018/19: <https://www.gov.uk/government/statistics/hate-crime-england-and-wales-2018-to-2019>

- Allowing disabled people to have pets
- Considering history of unacceptable behaviour when shortlisting *other* applicants, including history of hate crime.

However,

With disabled people less likely to be in work than non-disabled people, prioritising around one third of allocations to people working locally could have a negative impact on this group. Although this will be partly offset by most of the remaining two thirds being available to people whether working or not.

(c) Gender reassignment

Gender reassignment statistically makes individuals more at risk from violent crime. Around 2% of recorded hate crimes in 2018/19 were primarily transgender based, with an increase of 37% compared with the previous year. ⁶

The policy should support those who have been/ are going through gender reassignment by considering any history of unacceptable behaviour amongst other applicants, including hate crime, when short listing.

(d) Marriage and civil partnership

NO IMPACT IDENTIFIED

⁶ Government hate crime statistics 2018/19:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/839172/hate-crime-1819-hosb2419.pdf

(e) Pregnancy and maternity

POSITIVE AND NEGATIVE IMPACT

Research suggests that pregnant women or those who have recently given birth may be more likely to lose their jobs than others.⁷ This group, as well as mothers who have given up employment to care for a child, may be disadvantaged by giving priority on one third of allocations to local workers. However, most of the remaining homes will be available for them to bid on.

(f) Race – Note that the protected characteristic ‘race’ refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

POSITIVE AND NEGATIVE IMPACT

Ethnic minorities are less likely to be employed than the white population. In 2018, 77% of White people were employed, compared with 65% of people from all other ethnic groups combined⁸

This may put them at a disadvantage in accessing allocations prioritised for those in work. However, there should be no disadvantage in accessing most of the remaining homes on the site.

The rate of poverty is much higher for Black and Minority Ethnic families. Nearly half of all people living in families where the household head is Black/African/Caribbean/Black British are in poverty, compared to just under one in five (19%) of those living in families where the head of household is White. People in Black and Minority Ethnic families are also between two and three times more likely to be in persistent poverty than people in White families.⁹

Capping rents at 2019/20 Local Housing Allowance rates and carrying out affordability assessments to ensure applicants can afford the rents should benefit this group.

The majority of hate crimes are race-related, making up 76% of hate crimes in England & Wales recorded in 2018-19. The policy should support ethnic minority residents by considering other applicants’ history of unacceptable behaviour, including hate crime, when short listing.

⁷ EHRC research Pregnancy & maternity discrimination research; <https://www.equalityhumanrights.com/en/managing-pregnancy-and-maternity-workplace/pregnancy-and-maternity-discrimination-research-findings>

⁸ Government employment statistics: <https://www.ethnicity-facts-figures.service.gov.uk/work-pay-and-benefits/employment/employment/latest>

⁹ Social Metrics Commission, Measuring poverty 2020: <https://socialmetricscommission.org.uk/wp-content/uploads/2020/06/Measuring-Poverty-2020-1.pdf>

(g) Religion or belief

8% of hate crimes nationally in 2018/19 were recorded as religious hate crime. The policy should support residents with religious beliefs by considering other applicants' history of unacceptable behaviour, including hate crime, when short listing.

(h) Sex

Female employment nationally is currently 72%, in comparison to 80% for males.¹⁰ In Cambridge also, women are less likely to be economically active than men. Women in Cambridge also earn less than men, particularly those on low incomes.¹¹

This may mean that women are less likely to access the third of homes aimed at those in work.

However, as the gender pay gap is 17%¹² by keeping homes at or below 2019-20 Local Housing Allowance rates this may help to support women on low incomes

Rough sleeping is more common amongst men than women, with men making up 75% of rough sleepers identified in the 2018 Cambridge street count.¹³ Allocating two homes for rough sleepers through the Housing First initiative should have a proportionally positive benefit for men.

¹⁰ Parliament UK Women and the Economy <http://www.parliament.uk/briefing-papers/sn06838.pdf>

¹¹ Cambridge City Council Anti-Poverty Strategy

¹² ONS Gender pay gap in the UK

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/bulletins/genderpaygapintheuk/2019>

¹³ Cambridge City Council Homelessness & Rough Sleeping Review 2019

<https://www.cambridge.gov.uk/media/8072/homelessness-and-rough-sleeping-review.pdf>

(i) Sexual orientation

POSITIVE IMPACT

In 2018, sexual orientation was the main motivating factor 14% of hate crimes. The policy should benefit this group by considering history of other applicants' unacceptable behaviour, including hate crime, when short listing.

(j) Other factors that may lead to inequality – in particular, please consider the impact of any changes on low income groups or those experiencing the impacts of poverty

Poverty: POSITIVE AND NEGATIVE IMPACT

Social housing tenants tend to be on lower incomes than those in other tenures.¹⁴ Setting rents at or below 2019/20 Local Housing Allowance rates rather than 2020/21 rates should help to ensure that homes are as affordable as possible to those who need them.

Carrying out applicant affordability assessments prior to allocating homes should also help to ensure that residents being allocated homes are able to afford the rents.

Allocating a third of homes to those who are working locally may have a positive impact on low income groups whose travel costs to work are high because they currently have to live a long way from their place of work.

However, giving some priority to people in work may have a negative impact on those who have/may become unemployed related to the Covid-19 pandemic, including those affected by the overall benefit cap.

11. Action plan – New equality impacts will be identified in different stages throughout the planning and implementation stages of changes to your strategy, policy, plan, project, contract or major change to your service. How will you monitor these going forward? Also, how will you ensure that any potential negative impacts of the changes will be mitigated? (Please include dates where possible for when you will update this EqIA accordingly.)

The letting process is staggered from August 2020 until the end of 2021 and will be monitored so that any unidentified impacts can be addressed and changes to the plan as needed. This will include monitoring the profile of successful applicants once around half the homes have been allocated to understand whether particular groups appear to be

¹⁴ English Housing Survey Social rented sector 2017-18: <https://www.gov.uk/government/statistics/english-housing-survey-2017-to-2018-social-rented-sector>

disadvantaged compared with others. The Local Lettings Plan will then be adjusted if appropriate. [HR1]

This will be especially important with the everchanging picture in relation to the Covid-19 pandemic and we may have to deviate from the plan if particular groups are being unfairly disadvantaged.

12. Do you have any additional comments?

This plan has been created with consideration to the Council's Housing Strategy, Anti-Poverty Strategy and Climate Change Policy. The plan will operate in conjunction with the Council's Lettings Policy.

13. Sign off

Name and job title of lead officer for this equality impact assessment: **Nathan Chapman, Housing Officer**

Names and job titles of other assessment team members and people consulted: **Sandra Farmer, Housing Services Manager (City Homes). James McWilliams, Housing Services Manager (Housing Advice), Helen Reed (Housing Strategy Manager).**

Date of EqIA sign off: [Click here to enter text.](#)

Date of next review of the equalities impact assessment[HR2]: [Throughout lettings process Once half the homes have been allocated??\(August 2020-late 2021\) \(August 2020-late 2021\)](#)

Date to be published on Cambridge City Council website: [Click here to enter text.](#)

All EqIAs need to be sent to Helen Crowther, Equality and Anti-Poverty Officer. Ctrl + click on the button below to send this (you will need to attach the form to the email):

[Send form](#)
