

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:
Adoption of The Private Rented Sector Housing Standard
2. Webpage link to full details of the strategy, policy, plan, project, contract or major change to your service (if available)
N/A
3. What is the objective or purpose of your strategy, policy, plan, project, contract or major change to your service?
<p>The introduction of The Private Rented Sector Housing Standard to be adopted for reference / use in relation to baseline minimum standards within private rental accommodation throughout Cambridge City.</p> <p>The Standard document will be used to inform clear and consistent advice / enforcement action in relation to non-compliance with standards by The Council where necessary. Thus continuing work to ensure safe and suitable accommodation is provided to occupiers within the private rented sector in Cambridge City.</p>
4. Responsible Service
Residential Team, Environmental Services

5. Who will be affected by this strategy, policy, plan, project, contract or major change to your service? (Please tick those that apply)

Residents of Cambridge City

Visitors to Cambridge City

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):

- Landlords
- Managing agents
- Tenants in the Private Rented Sector

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

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)

No

Yes (Please provide details):

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

It is due to go to Housing Scrutiny Committee on the 19th June 2018.

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?

In terms of 'Space Standards' within The Private Rented Sector Housing Standard the following have been taken into account:

- The Governments proposed national minimum room size standards in terms of licensable HMO's.
- Minimum bedroom size standards detailed within the proposed Local Plan.
- Working knowledge of the nature of housing stock provision forming the private rented sector within Cambridge City.
- Housing demand for private rented sector accommodation and the associated need to prevent social exclusion.

A three week consultation was launched on 8th May 2018 which included access to a copy of the proposed draft Private Rented Sector Housing Standard and sought views from any stakeholders that may be affected by the introduction of this new Standard document.

This consultation was primarily web based being advertised and accessed via the Cambridge City Council website with a link to the Survey Monkey consultation questionnaire.

However, care was taken to notify a number of those individuals who may be affected by the introduction of the proposed Standard of the consultation launch details.

Proposed 'Space Standards' from the draft Standard document were presented and discussed during the most recent Landlord Forum on 21st February 2018 which was well attended.

The proposed draft Private Rented Sector Housing Standard document was presented and discussed during the most recent Landlord Steering Group meeting on 10th May 2018.

Several hundred Landlords and property managers / agents from the Landlord list held by Cambridge City Council were notified by e-mail / post accordingly with regards to the launch of the consultation.

There was a press release regarding the consultation launch and Cambridge City Council social media feeds were requested to be updated towards the end of the consultation to advise the wider community that it was coming to an end.

Consultation responses were received from Landlords, property agents / managers, tenants and Cambridge residents.

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 - Any group of people of a particular age (e.g. 32 year-olds) , or within a particular age range (e.g. 16-24 year-olds) – in particular, please consider any safeguarding issues for children and vulnerable adults

Landlords / Property Agents / Managers - The introduction of The Private Rented Sector Housing Standard could affect any adult who owns / is responsible for private rented sector accommodation within Cambridge City regardless of their age. There is no evidence to suggest it would raise safeguarding issues based on the contents of the proposed Private Rented Sector Housing Standard document.

The effect of introduction of The Private Rented Sector Housing Standard on Landlords / property agents / managers will be that some private rented sector properties may require additional work to improve safety and suitability standards.

Residents occupying private sector rental accommodation - There is no definitive data available in relation to the age of occupants within private rented sector accommodation within Cambridge. Anecdotally, single, younger persons aged 20-40 will typically be found within those private rented sector properties that are in multiple occupation. However, with high housing costs within Cambridge private sector rented accommodation is widely occupied.

The introduction of The Private Rented Sector Housing Standard aims to continue work to further improve safe and suitability standards of accommodation within this sector which will have a positive impact for people occupying such accommodation of all protected characteristics.

It is possible that instances of safeguarding may reduce with improvement of property standards e.g. the Government are introducing national minimum room size criteria including that in relation to the size of sleeping rooms that children can occupy this has been detailed within the 'Space Standards' section of The Private Rented Sector Housing Standard.

(b) Disability - A person has a disability if she or he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities

Landlords / Property Agents / Managers - The introduction of The Private Rented Sector Housing Standard could affect any adult who owns / is responsible for private rented sector accommodation within Cambridge City. There is no evidence to suggest that it will have a negative effect on those with a disability. We do not require information regarding any disability of those responsible for private sector rented accommodation in Cambridge.

The effect of introduction of The Private Rented Sector Housing Standard on Landlords / property agents / managers will be that some private rented sector properties may require additional work to improve safety and suitability standards.

Residents occupying private sector rental accommodation - There is no information available with regard to disability and occupiers within the private rented sector. The introduction of The Private Rented Sector Housing Standard aims to continue work to further improve safe and suitability standards of accommodation within this sector which will have a positive impact for people occupying such accommodation within Cambridge City of all protected characteristics. This may also ultimately help prevent disability and long-term illness caused by poor housing conditions.

(c) Sex – A man or a woman.

Landlords / Property Agents / Managers - There is no evidence that the introduction of The Private Rented Sector Housing Standard will have any specific greater effect on either men or women.

The effect of introduction of The Private Rented Sector Housing Standard on Landlords / property agents / managers will be that some private rented sector properties may require additional work to improve safety and suitability standards.

Residents occupying private sector rental accommodation - There is no evidence of people of a particular sex being more or less likely to reside within private rented sector accommodation. However the introduction of The Private Rented Sector Housing Standard aims to continue work to further improve safe and suitability standards of accommodation within this sector which will have a positive impact for people occupying such accommodation within Cambridge City of all protected characteristics.

(d) Transgender – A person who does not identify with the gender they were assigned to at birth (includes gender reassignment that is the process of transitioning from one gender to another)

Landlords / Property Agents / Managers - We do not require information relating to the gender of those responsible for private sector rented accommodation in Cambridge, so do not have equalities monitoring data related to this protected characteristic, but there is no evidence to suggest that the changes will have any specific effect.

The effect of introduction of The Private Rented Sector Housing Standard on Landlords / property agents / managers will be that some private rented sector properties may require additional work to improve safety and suitability standards.

Residents occupying private sector rental accommodation - There is no specific information available regarding transgender people living within the private rented sector. However the introduction of The Private Rented Sector Housing Standard aims to continue work to further improve safe and suitability standards of accommodation within this sector which will have a positive impact for people occupying such accommodation within Cambridge City of all protected characteristics.

(e) Pregnancy and maternity

Landlords / Property Agents / Managers – We do not require information on the pregnancy / maternity status of those responsible for private sector rented accommodation in Cambridge, so do not have equalities monitoring data related to this protected characteristic, but there is no evidence to suggest that the changes will have any specific effect.

The effect of introduction of The Private Rented Sector Housing Standard on Landlords / property agents / managers will be that some private rented sector properties may require additional work to improve safety and suitability standards.

Residents occupying private sector rental accommodation - There is no specific information available regarding pregnancy or maternity of people living within the private rented sector. It is likely some expectant mothers will live within this sector throughout the city. However the introduction of The Private Rented Sector Housing Standard aims to continue work to further improve safe and suitability standards of accommodation within this sector which will have a positive impact for people occupying such accommodation within Cambridge City of all protected characteristics.

(f) Marriage and civil partnership

Landlords / Property Agents / Managers – We do not require information on the marital status of those responsible for private sector rented accommodation in Cambridge, so do not have equalities monitoring data related to this protected characteristic, but there is no evidence to suggest that the changes will have any specific effect.

The effect of introduction of The Private Rented Sector Housing Standard on Landlords / property agents / managers will be that some private rented sector properties may require additional work to improve safety and suitability standards.

Residents occupying private sector rental accommodation - There is no specific information available regarding people who are married or in a civil partnership living within the private rented sector within Cambridge City. However the introduction of The Private Rented Sector Housing Standard aims to continue work to further improve safe and suitability standards of accommodation within this sector which will have a positive impact for people occupying such accommodation within Cambridge City of all protected characteristics.

(g) Race - The protected characteristic 'race' refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

Landlords / Property Agents / Managers - We do not require information on the race / ethnicity of those responsible for private sector rented accommodation in Cambridge, so do not have equalities monitoring data related to this protected characteristic, but there is no evidence to suggest that the changes will have any specific effect.

If language barriers are identified the relevant officer will ensure that steps are taken such as offering translated information or an interpreter where this is deemed appropriate.

The effect of introduction of The Private Rented Sector Housing Standard on Landlords / property agents / managers will be that some private rented sector properties may require additional work to improve safety and suitability standards.

Residents occupying private sector rental accommodation - We do not hold specific information on how all private sector accommodation is occupied in Cambridge in terms of breakdown related to race. National statistics show that housing of black and minority ethnic people live in tends to be of lower quality, especially among households of Pakistani origin, and overcrowding is more common, particularly among households of Bangladeshi origin. (Reference Cabinet Office (2017), 'Race Disparity Audit: Summary Findings from the Ethnicity Facts and Figures Website. The introduction of The Private Rented Sector Housing Standard will seek to improve the quality of accommodation within this sector so may have an especially positive impact on BAME people.

If language barriers are identified the relevant officer will ensure that steps are taken such as offering translated information or an interpreter where appropriate.

The introduction of The Private Rented Sector Housing Standard aims to continue work to further improve safe and suitability standards of accommodation within this sector which will have a positive impact for people occupying such accommodation within Cambridge City of all protected characteristics.

(h) Religion or belief

Landlords / Property Agents / Managers - We do not require information on the religion or belief of those responsible for private sector rented accommodation in Cambridge, so do not have equalities monitoring data related to this protected characteristic, but there is no evidence to suggest that the changes will have any specific effect.

Officers would ensure they offer appropriate support, considering when to make appointments, where specific religious events, festivals or prayer have been identified.

The effect of introduction of The Private Rented Sector Housing Standard on Landlords / property agents / managers will be that some private rented sector properties may require additional work to improve safety and suitability standards.

Residents occupying private sector rental accommodation - We do not hold information on religions / beliefs of occupiers of all private rented accommodation in Cambridge.

Officers would ensure they offer appropriate support, considering when to make appointments, where specific religious events, festivals or prayer have been identified.

The introduction of The Private Rented Sector Housing Standard aims to continue work to further improve safe and suitability standards of accommodation within this sector which will have a positive impact for people occupying such accommodation within Cambridge City of all protected characteristics.

(i) Sexual orientation

Landlords / Property Agents / Managers - We do not require information on the sexual orientation of those responsible for private sector rented accommodation in Cambridge, so do not have equalities monitoring data related to this protected characteristic, but there is no evidence to suggest that the changes will have any specific effect.

Residents occupying private sector rental accommodation - There is no specific evidence relating to sexual orientation of occupiers of all private sector rented accommodation in Cambridge.

The introduction of The Private Rented Sector Housing Standard aims to continue work to further improve safe and suitability standards of accommodation within this sector which will have a positive impact for people occupying such accommodation within Cambridge City of all protected characteristics.

(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

Impact on low income tenants – There is a possibility that the cost of required improvements to housing may be passed on to tenants within rental amounts however it is worth noting that certain items of work that may be required e.g. fire precaution works and the installation of a fire alarm system / fire doors involve a more significant financial out - going at the point of installation and once installed there are generally only then on-going routine servicing and maintenance costs associated with such works.

However there is awareness that some private sector rental accommodation within Cambridge is operated by rogue landlords who exploit vulnerable tenants, by renting sub-standard, overcrowded and dangerous accommodation. Poor practice can include: housing illegal migrants; failing to meet the required health and safety standards; permitting overcrowding; and ineffective management of tenant behaviour. The introduction of The Private Rented Sector Housing Standard aims to continue work to further improve safe and suitability standards of accommodation within this sector which will have a positive impact for people occupying such accommodation within Cambridge City of all protected characteristics.

Alongside this there are protections for tenants against “retaliatory eviction” under the Deregulation Act 2015 where they have a legitimate complaint about the condition of their property which the Residential Team, Environmental Services have the power to enforce where necessary.

Tenant wishes will continue to be taken into account in terms of determining the appropriate course of action in relation to individual cases where enforcement of required standards is being considered.

Financial Impact on Landlords, Property Agents / Managers – The effect of the introduction of The Private Rented Sector Housing Standard on Landlords / property agents / managers will be that some private rented sector properties may require additional work to improve safety and suitability standards which may involve an associated financial outgoing.

Taking into account the nature and extent of the works that are required responsible individuals will be provided with a reasonable / realistic time period within which to carry out these works. In the majority of cases such improvement works can be carried out whilst the property is still occupied, (meaning retention of rental income), provided that occupiers are given notice of and made fully aware of the extent of any works and that all reasonable steps are taken to ensure minimal disruption to them whilst works are on-going.

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 EqlA accordingly.)

The contents of the Private Rented Sector Housing Standard Document will be subject to review as necessary. Any impacts / issues with regards to the final standard document will be considered individually as they arise in liaison with appropriate colleagues / stakeholders as necessary.

12. Do you have any additional comments?

Relevant legislation and accepted guidance standards have been taken into consideration during the development of The Private Rented Sector Housing Standard meaning that the Standard contains a number of required standards that those responsible for private rented sector accommodation within Cambridge will be required to ensure that their property complies with. Cambridge City Council will have a statutory duty to consider enforcement action in relation to flagrant non-compliance in line with the Enforcement Policy.

There is no change to how staff from within the Residential Team will be required to carry out their role in relation to ensuring safe and suitable accommodation is provided within the private rented sector within Cambridge City, they will continue to do this whilst having regard to The Private Rented Sector Housing Standard where necessary.

13. Sign off

Name and job title of lead officer for this equality impact assessment:

Names and job titles of other assessment team members and people consulted:

Date of EqlA sign off:

Date of next review of the equalities impact assessment: In response to any impacts / issues arising upon implementation of The Private Rented Sector Housing Standard or in 1 years' time whichever is soonest.

Sent to Helen Crowther, Equality and Anti-Poverty Officer?

Yes

No

Date to be published on Cambridge City Council website (if known):