

Cambridge City Council Equality Impact Assessment

Completing an Equality Impact Assessment will help you to think about what impact your strategy, policy, plan, project, contract or major change to your service may have on people that live in, work in or visit Cambridge, as well as on City Council staff.

The template is easy to use. You do not need to have specialist equalities knowledge to complete it. It asks you to make judgements based on evidence and experience. There are guidance notes on the intranet to help you. You can also get advice from David Kidston, Strategy and Partnerships Manager on 01223 457043 or email david.kidston@cambridge.gov.uk or from any member of the Joint Equalities Group.

1. Title of strategy, policy, plan, project, contract or major change to your service:

Policy for sourcing private rented sector options

2. What is the objective or purpose of your strategy, policy, plan, project, contract or major change to your service?

To set a framework for Housing Advisors to source appropriate housing options for people who approach Cambridge City Council when they are homeless, or threatened with homelessness. It helps Housing Advisors decide what are suitable options for applicants to pursue, and what are suitable properties to offer in discharge of a full housing duty (where applicable).

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

- Residents
- Visitors
- Staff

A specific client group or groups (please state):
All client groups who are homeless or threatened with homelessness within 56 days.

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

- New
- Revised
- Existing

5. Responsible directorate and service

Directorate: Customer & Community Services

Service: Housing Advice Service

6. Are other departments or partners involved in delivering this strategy, policy, plan, project, contract or major change to your service?

No

Yes (please give details):

7. Potential impact

Please list and explain how this strategy, policy, plan, project, contract or major change to your service could **positively** or **negatively** affect individuals from the following equalities groups.

When answering this question, please think about:

- The results of relevant consultation that you or others have completed (for example with residents, people that work in or visit Cambridge, service users, staff or partner organisations).
- Complaints information.
- Performance information.
- Information about people using your service (for example whether people from certain equalities groups use the service more or less than others).
- Inspection results.
- Comparisons with other organisations.
- The implementation of your piece of work (don't just assess what you think the impact will be after you have completed your work, but also think about what steps you might have to take to make sure that the implementation of your work does not negatively impact on people from a particular equality group).
- The relevant premises involved.
- Your communications.
- National research (local information is not always available, particularly for some equalities groups, so use national research to provide evidence for your conclusions).

(a) Age (any group of people of a particular age, including younger and older people)

POSITIVE: The policy aims to ensure that ALL applicants will receive fair and consistent consideration. Each person will receive a comprehensive needs assessment and a Personalised Housing Plan (PHP), and thus each case will be considered on its individual merit. The PHP will be delivered in writing, so all considerations will be transparent. The PHP will be continually reviewed during its life, and so will be adjusted to meet a person's changing needs. There is a statutory right of review of the reasonableness of the steps that are encapsulated in the Personalised Housing Plan.

The Policy recognises its duty to adhere to the Equality Act 2010 legislation

NEGATIVE: There is insufficient evidence at present to say whether or not the new policy might have an age-related negative impact. However, we are conscious that single people under 25 years tend to be disproportionately represented among the homeless, who have limited choices in the housing market. Since the introduction of the Homelessness Reduction Act 2017, local housing authorities have new duties to help prevent and relieve homelessness, including amongst non-priority groups, such as healthy single people, and this policy will equally cover priority and non-priority groups. This is a clear positive for younger people. However, non-priority single people may be more likely to be affected by the new policy because they are less likely to have strong reasons to remain in the city (other than due to inflexible work commitments at unsociable hours). They are likely to be more mobile and adaptable. Whenever there are vulnerabilities or extenuating circumstances, however, these will be taken into account in the application of the policy.

(b) Disability (including people with a physical impairment, sensory impairment, learning disability, mental health problem or other condition which has an impact on their daily life)

POSITIVE: The policy aims to ensure that ALL applicants will receive fair and consistent consideration. Each person will receive a comprehensive needs assessment and a Personalised Housing Plan (PHP), and thus each case will be considered on its individual merit. The PHP will be delivered in writing, so all considerations will be transparent. The PHP will be continually reviewed during its life, and so will be adjusted to meet a person's changing needs. There is a statutory right of review of the reasonableness of the steps that are encapsulated in the Personalised Housing Plan.

The Policy recognises its duty to adhere to the Equality Act 2010 legislation. The Council will arrange an OT assessment, whenever there is at least one household member with a physical disability (and where an OT assessment is not already available). The advice of the OT will be taken into account in assisting the household into accommodation. Where adaptations are required, the practicality of arranging these during a fixed term private sector tenancy will be considered.

NEGATIVE: There is insufficient evidence at present to say whether or not the new policy might have an disability-related negative impact. However, we are conscious that applicants with mental health issues are likely to be disproportionately represented among homeless applicants. They may also be the client group that is most significantly affected by change and disruption. Although adequate safeguards are in place to consider support needs and vulnerabilities in the application of this policy, some undiagnosed or dormant mental health problems may go undetected by Housing Advisors.

Accommodation which is not suitably adapted will not be offered to people with disabilities. However, people developing mobility issues during a tenancy may find that a private landlord may not give permission for adaptations.

(c) Gender

POSITIVE: The policy aims to ensure that ALL applicants will receive fair and consistent consideration. Each person will receive a comprehensive needs assessment and a Personalised Housing Plan (PHP), and thus each case will be considered on its individual merit. The PHP will be delivered in writing, so all considerations will be transparent. The PHP will be continually reviewed during its life, and so will be adjusted to meet a person's changing needs. There is a statutory right of review of the reasonableness of the steps that are encapsulated in the Personalised Housing Plan.

NEGATIVE: There is insufficient evidence at present to say whether or not the new policy might have an gender-related negative impact. However, we are conscious that young single mothers are disproportionately represented among those who present as homeless or at risk of homelessness. Victims of domestic abuse tend also to be predominantly female. The policy seeks to ensure that applicants remain within a reasonable travelling distance of meaningful family support networks, or, conversely, at a safe distance from perpetrators of violence or abuse.

(d) Pregnancy and maternity

POSITIVE: The policy aims to ensure that ALL applicants will receive fair and consistent consideration. Each person will receive a comprehensive needs assessment and a Personalised Housing Plan (PHP), and thus each case will be considered on its individual merit. The PHP will be delivered in writing, so all considerations will be transparent. The PHP will be continually reviewed during its life, and so will be adjusted to meet a person's changing needs. There is a statutory right of review of the reasonableness of the steps that are encapsulated in the Personalised Housing Plan.

NEGATIVE: There is insufficient evidence at present to say whether or not the new policy might have a pregnancy and maternity-related negative impact. However, we are conscious that it may not be suitable to relocate expectant mothers in the later stages of pregnancy. Furthermore, there is potential for expectant and new mothers to become isolated if located away from family support networks and friends. This needs to be taken into account in assessing suitability. Will also need easy access to health and maternity services.

Design of property selected also needs to take into account additional accessibility challenges for this group.

(e) Transgender (including gender re-assignment)

POSITIVE: The policy aims to ensure that ALL applicants will receive fair and consistent consideration. Each person will receive a comprehensive needs assessment and a Personalised Housing Plan (PHP), and thus each case will be considered on its individual merit. The PHP will be delivered in writing, so all considerations will be transparent. The PHP will be continually reviewed during its life, and so will be adjusted to meet a person's changing needs. There is a statutory right of review of the reasonableness of the steps that are encapsulated in the Personalised Housing Plan.

NEGATIVE: There is insufficient evidence at present to say whether or not the new policy might have a transgender-related negative impact. However, we are conscious that those undergoing gender reassignment may need to remain close to medical and other support services. We are also conscious that there appears to be a higher risk that transgendered people may be the victims of physical and verbal assault compared with the general population, but there is no clear local evidence of a locational higher risk once population is adjusted for.

(f) Marriage and Civil Partnership

POSITIVE: The policy aims to ensure that ALL applicants will receive fair and consistent consideration. Each person will receive a comprehensive needs assessment and a Personalised Housing Plan (PHP), and thus each case will be considered on its individual merit. The PHP will be delivered in writing, so all considerations will be transparent. The PHP will be continually reviewed during its life, and so will be adjusted to meet a person's changing needs. There is a statutory right of review of the reasonableness of the steps that are encapsulated in the Personalised Housing Plan.

NEGATIVE: No obvious negative impact.

(g) Race or Ethnicity

POSITIVE: The policy aims to ensure that ALL applicants will receive fair and consistent consideration. Each person will receive a comprehensive needs assessment and a Personalised Housing Plan (PHP), and thus each case will be considered on its individual merit. The PHP will be delivered in writing, so all considerations will be transparent. The PHP will be continually reviewed during its life, and so will be adjusted to meet a person's changing needs. There is a statutory right of review of the reasonableness of the steps that are encapsulated in the Personalised Housing Plan.

NEGATIVE: There is insufficient evidence at present to say whether or not the new policy might have a race or ethnicity-related negative impact. However, we are conscious that consideration should be given in relation to assessing the risk of, and providing protection for, tenants from ethnic minority backgrounds, including Eastern Europeans and Gypsy & Traveller communities.

In creating and reviewing a Personalised Housing Plan with an applicant, Housing Advisors must be mindful of the reasonableness of accepting a private rented sector letting, where there is any risk that a particular landlord may discriminate, either directly or indirectly, against applicants with specific racial characteristics.

(h) Religion or Belief

POSITIVE: The policy aims to ensure that ALL applicants will receive fair and consistent consideration. Each person will receive a comprehensive needs assessment and a Personalised Housing Plan (PHP), and thus each case will be considered on its individual merit. The PHP will be delivered in writing, so all considerations will be transparent. The PHP will be continually reviewed during its life, and so will be adjusted to meet a person's changing needs. There is a statutory right of review of the reasonableness of the steps that are encapsulated in the Personalised Housing Plan.

NEGATIVE: There is insufficient evidence at present to say whether or not the new policy might have a religion or belief-related negative impact.

(i) Sexual Orientation

POSITIVE: The policy aims to ensure that ALL applicants will receive fair and consistent consideration under the policy, and each case will be considered on an individual merit. This implies that individuals regardless of sexual orientation will be treated equally.

NEGATIVE: There is insufficient evidence at present to say whether or not the new policy might have a sexual orientation-related negative impact. We are conscious that there appears to be a higher risk that LGB people may be the victims of physical and verbal assault compared with the general population, but there is no clear local evidence of a locational higher risk once population is adjusted for.

(j) Other factor that may lead to inequality (please state):

Accessibility of policy and related guidance e.g. by blind/partially blind or hard of hearing, and those with low levels of literacy.

Those with limited or no access to the internet may be restricted in their ability to bid for properties.

People from some of the above groups may be disadvantaged at the end of the tenancy period if appropriate proactive support is not available to them in finding alternative accommodation.

8. If you have any additional comments please add them here

In relation to protected characteristics a, c, g, h and i, it should be emphasised that reference to any negative impact the new policy may have is included to point up a potential risk only, albeit risk we are rightly alert to. Hard information about unlawful discrimination and criminal acts directed against people with protected characteristics is difficult to interpret in terms of geographical location - the most important impact of this proposed new policy. Looking at our own information, there is no indication from customer complaints that people with a protected characteristic have experienced any greater difficulty if assisted into accommodation outside of Cambridge than a person without that characteristic, although our sample is fairly small at present. Our commitment, as outlined in the action plan, is that we will continuously monitor and sample, building in safeguards and making adjustments as necessary.

9. Conclusions and Next Steps

- If you have not identified any negative impacts, please sign off this form.
- If you have identified potential negative actions, you must complete the action plan at the end of this document to set out how you propose to mitigate the impact. If you do not feel that the potential negative impact can be mitigated, you must complete question 8 to explain why that is the case.
- If there is insufficient evidence to say whether or not there is likely to be a negative impact, please complete the action plan setting out what additional information you need to gather to complete the assessment.

All completed Equality Impact Assessments must be emailed to David Kidston, Strategy and Partnerships Manager, who will arrange for it to be published on the City Council's website. Email david.kidston@cambridge.gov.uk

10. Sign off

Name and job title of assessment lead officer: James McWilliams, Housing Advice Service Manager

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

Ruth Trown, Policy & Performance Officer

Date of completion: 31st May 2018

Date of next review of the assessment: 1st June 2019

Action Plan

Equality Impact Assessment title:

Date of completion: 31st May 2018

Equality Group	Age
Details of possible disadvantage or negative impact	There is insufficient evidence at present to say whether or not the new policy might have an age-related negative impact. However, we are conscious that single people under 25 years tend to be disproportionately represented among the homeless, who have limited choices in the housing market. Since the introduction of the Homelessness Reduction Act 2017, local housing authorities have new duties to help prevent and relieve homelessness, including amongst non-priority groups, such as healthy single people, and this policy will equally cover priority and non-priority groups. This is a clear positive for younger people. However, non-priority single people may be more likely to be affected by the new policy because they are less likely to have strong reasons to remain in the city (other than due to inflexible work commitments at unsociable hours). They are likely to be more mobile and adaptable. Whenever there are vulnerabilities or extenuating circumstances, however, these will be taken into account in the application of the policy.
Action to be taken to address the disadvantage or negative impact	Regular monitoring of complaints data and the incidence of requests for statutory review of the reasonableness of PHP steps, and the suitability of accommodation offered in discharge of the full housing duty
Officer responsible for progressing the action	Housing Services Manager - Housing Advice
Date action to be completed by	Quarterly (ongoing)

Equality Group	Disability
Details of possible disadvantage or negative impact	
Action to be taken to address the disadvantage or negative impact	<p>Liaison with groups representing those with mental health issues;</p> <p>Refreshing of training in the symptoms, identification and impact of common mental health problems.</p> <p>Full consideration of mobility issues as part of the PHP. and strict monitoring of disability issues arising in the course of a tenancy.</p> <p>.</p>
Officer responsible for progressing the action	Housing Services Manager - Housing Advice
Date action to be completed by	Ongoing - report quarterly

Equality Group	Gender
Details of possible disadvantage or negative impact	<p>There is insufficient evidence at present to say whether or not the new policy might have an gender-related negative impact. However, we are conscious that young single mothers are disproportionately represented among those who present as homeless or at risk of homelessness. Victims of domestic abuse tend also to be predominantly female. The policy seeks to ensure that applicants remain within a reasonable travelling distance of meaningful family support networks, or, conversely, at a safe distance from perpetrators of violence or abuse.</p>
Action to be taken to address the disadvantage or negative impact	Regular monitoring of complaints data and the incidence of requests for statutory review of the reasonableness of PHP steps, and the suitability of accommodation offered in discharge of the full housing duty
Officer responsible for progressing the action	Housing Services Manager - Housing Advice
Date action to be completed by	Quarterly (ongoing)

Equality Group	Pregnancy and Maternity
Details of possible disadvantage or negative impact	<p>There is insufficient evidence at present to say whether or not the new policy might have a pregnancy and maternity-related negative impact. However, we are conscious that it may not be suitable to relocate expectant mothers in the later stages of pregnancy. Furthermore, there is potential for expectant and new mothers to become isolated if located away from family support networks and friends. This needs to be taken into account in assessing suitability. Will also need easy access to health and maternity services.</p> <p>Design of property selected also needs to take into account additional accessibility challenges for this group.</p>
Action to be taken to address the disadvantage or negative impact	Regular monitoring of complaints data and the incidence of requests for statutory review of the reasonableness of PHP steps, and the suitability of accommodation offered in discharge of the full housing duty
Officer responsible for progressing the action	Housing Services Manager - Housing Advice
Date action to be completed by	Quarterly (ongoing)

Equality Group	Transgender
Details of possible disadvantage or negative impact	<p>There is insufficient evidence at present to say whether or not the new policy might have a transgender-related negative impact. However, we are conscious that those undergoing gender reassignment may need to remain close to medical and other support services. We are also conscious that there appears to be a higher risk that transgendered people may be the victims of physical and verbal assault compared with the general population, but there is no clear local evidence of a locational higher risk once population is adjusted for.</p>
Action to be taken to address the disadvantage or negative impact	Regular monitoring of complaints data and the incidence of requests for statutory review of the reasonableness of PHP steps, and the suitability of accommodation offered in discharge of the full housing duty
Officer responsible for progressing the action	Housing Services Manager - Housing Advice
Date action to be completed by	Quarterly (ongoing)

Equality Group	Marriage and Civil Partnership
Details of possible disadvantage or negative impact	None at present
Action to be taken to address the disadvantage or negative impact	
Officer responsible for progressing the action	
Date action to be completed by	

Equality Group	Race or Ethnicity
Details of possible disadvantage or negative impact	<p>There is insufficient evidence at present to say whether or not the new policy might have an race or ethnicity-related negative impact. However, we are conscious that consideration should be given in relation to assessing the risk of, and providing protection for, tenants from ethnic minority backgrounds, including Eastern Europeans and Gypsy & Traveller communities.</p> <p>In creating and reviewing a Personalised Housing Plan with an applicant, Housing Advisors must be mindful of the reasonableness of accepting a private rented sector letting, where there is any risk that a particular landlord may discriminate, either directly or indirectly, against applicants with specific racial characteristics.</p> <p>.</p>
Action to be taken to address the disadvantage or negative impact	Liaison with Housing Standards, to share information about landlords who may be a risk
Officer responsible for progressing the action	Housing Services Manager - Housing Advice
Date action to be completed by	Quarterly (ongoing)

Equality Group	Religion or Belief
Details of possible disadvantage or negative impact	There is insufficient evidence at present to say whether or not the new policy might have a religion or belief-related negative impact.
Action to be taken to address the disadvantage or negative impact	Regular monitoring of complaints data and the incidence of requests for statutory review of the reasonableness of PHP steps, and the suitability of accommodation offered in discharge of the full housing duty
Officer responsible for progressing the action	Housing Services Manager - Housing Advice
Date action to be completed by	Quarterly (ongoing)

Equality Group	Sexual Orientation
Details of possible disadvantage or negative impact	There is insufficient evidence at present to say whether or not the new policy might have a sexual orientation-related negative impact. We are conscious that there appears to be a higher risk that LGB people may be the victims of physical and verbal assault compared with the general population, but there is no clear local evidence of a locational higher risk once population is adjusted for.
Action to be taken to address the disadvantage or negative impact	Regular monitoring of complaints data and the incidence of requests for statutory review of the reasonableness of PHP steps, and the suitability of accommodation offered in discharge of the full housing duty
Officer responsible for progressing the action	Housing Services Manager - Housing Advice
Date action to be completed by	Quarterly (ongoing)

Other factors that may lead to inequality	
Details of possible disadvantage or negative impact	None identified
Action to be taken to address the disadvantage or negative impact	
Officer responsible for progressing the action	
Date action to be completed by	