

## 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](mailto:equalities@cambridge.gov.uk) or phone 01223 457046.

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

<b>1. Title of strategy, policy, plan, project, contract or major change to your service</b>
Cambridge City Caravan Site Licensing & Fee Policy

<b>2. Webpage link to full details of the strategy, policy, plan, project, contract or major change to your service (if available)</b>
<a href="#">Agenda for Housing Scrutiny Committee on Thursday, 20th January, 2022, 5.30 pm - Cambridge Council</a>

<b>3. What is the objective or purpose of your strategy, policy, plan, project, contract or major change to your service?</b>
Recent national legislative changes including the introduction of the Mobile Homes (Requirement for Manager of Site to be Fit and Proper Person) (England) Regulations 2020 have established a need for an encompassing policy setting out how the Council will carry out its statutory requirements for caravan site licensing, inspection, fit and proper person

determination, enforcement and fee setting. These are national legislative requirements that local authorities in England

**4. Responsible service**

Environmental Services

**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

Site owners and managers of caravan sites within the City.  
Residents who occupy units of accommodation as their home on these sites within the City.

**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

N/A

[Click here to enter text.](#)

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

Non key agenda item at Housing Scrutiny Committee on 20<sup>th</sup> January 2022.

**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?**

Reference to relevant government guidance including - [Mobile Homes Act 2013: a guide for local authorities on setting licence fees - GOV.UK \(www.gov.uk\)](#)

[Tackling inequalities faced by Gypsy, Roma and Traveller communities - Women and Equalities Committee \(parliament.uk\)](#)

The Council's 'Our Vision' - [Our vision - Cambridge City Council](#)

Local knowledge from licensing of 2 existing, established residential caravan sites within the City - [Caravan and camp sites - Cambridge City Council](#)

**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 - Please also consider any safeguarding issues for children and adults at risk**

There is no specific impact from this policy regarding age.

The 'fit & proper' person assessment will seek to ensure that those individuals involved in the management of caravan sites are competent and have relevant experience inc. identification of safeguarding issues for children and adults at risk which may therefore lead to a positive impact for any children or adults at risk who may become resident on sites.

**(b) Disability**

There is no specific impact from this policy regarding disability.

The policy encompasses caravan site licensing criteria for the City in terms of existing sites of which there are 2 and any applications made for new sites thus ensuring safety &

suitability standards. Ensuring safety and suitability standards which can help prevent disability or long-term health issues.

Anybody making an application for a new caravan site licence / fit & proper person assessment can be provided with support as necessary in terms of making / submitting their application. Examples as to support that can be provided e.g. an appointment to meet with case officer who can support face to face / over the telephone with completion of the application. BSL interpretation/Braille translation Provision of documents in accessible / easy read formats etc.

### **(c) Gender reassignment**

There is no specific impact from this policy for people with the protected characteristic of gender reassignment.

### **(d) Marriage and civil partnership**

There is no specific impact from this policy regarding marriage and civil partnership.

Site owners / managers who are applying to licence a caravan site / to be included on the fit & proper person register will be making individual applications.

### **(e) Pregnancy and maternity**

There are no specific impacts to pregnancy and maternity have been identified in relation to this policy.

### **(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.**

Applications may be received for new Gypsy Roma & Traveller sites within the City as these are included within the legislative definition of a ‘relevant protected site.’ Guidance specifies that Local Authorities assess GRT sites against the same criteria as traditional sites. A Gypsy, Roma and Traveller accommodation needs assessment is undertaken for city and surrounding districts to identify need for permanent and/or temporary sites. If need identified, then this would be addressed through the Local Plan and for individuals wanting

to set up new site relevant planning permission would need to be sought via the Councils planning service prior to an individual site licence application being made. Anybody making an application for a new caravan site licence / fit & proper person assessment can be provided with support as necessary in terms of making / submitting their application. Examples of support that can be provided e.g. an appointment to meet with case officer who can support face to face / over the telephone with completion of the application. BSL interpretation/Braille translation Provision of documents in accessible / easy read formats etc.

**(g) Religion or belief**

No impacts specific to religion or belief have been identified in relation to this policy.

**(h) Sex**

No impacts specific to men or women have been identified in relation to this policy.

**(i) Sexual orientation**

No impacts specific to an individual's sexual orientation have been identified in relation to this policy.

**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**
- **Groups who have more than one protected characteristic that taken together create overlapping and interdependent systems of discrimination or disadvantage. (Here you are being asked to consider intersectionality, and for more information see: [https://media.ed.ac.uk/media/1\\_159kt25q](https://media.ed.ac.uk/media/1_159kt25q)).**

**Low-income groups or those experiencing the impacts of poverty:**

There may be a negative impact on such site residents owing to this policy. The policy introduces annual site inspection fees and a 5 yearly, (this is the term of the register entry in most cases), fit & proper person assessment fee. Site owners / managers may look to offset the cost of these fees against rent. This should however have a minimal impact in terms of the 2 existing sites within the City as there are several units of accommodation on

each site – 24 on one site and 23 on the other. Site owners / managers of the 2 existing caravan sites within the City have been informed of the proposed introduction of this policy inc. fee setting. To be deemed ‘fit & proper’ to be involved in the ownership / management of a licensed caravan site there has to be adequate financial means available for management and maintenance of a site assessment of this will limit the possibility of any of the associated fee costs being offset onto the residents.

**Groups who have more than one protected characteristic that taken together create overlapping and interdependent systems of discrimination or disadvantage:**

Research states that Gypsy, Roma and Traveller people are more likely to have long-term health issues than general population ([Tackling inequalities faced by Gypsy, Roma and Traveller communities - Report Summary - Women and Equalities Committee \(parliament.uk\)](https://www.parliament.uk/research-and-evidence/evidence-summary/2019-05-20/11668)). Therefore, better ensuring safety & suitability standards will have positive impact. Also, the communities are disproportionately likely to have low incomes so if rent costs become higher due to site managers offsetting caravan site policy fees to rent costs this may have a negative impact on their ability to stay on sites or afford to settle on sites.

**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.)**

Review policy annually, (there will be a review of the fee setting annually as part of the Councils wider budget setting process) / the policy will be reviewed further as necessary in between annual reviews in-line with any further legislative additions / amendments.

As part of ongoing review ensure that officers involved in licensing of caravan sites within the City inc. annual site licensing inspections / responding to any requests for service from residents of existing sites, record details of their involvement / intervention. If any barriers are identified that relate to being from a protected characteristic, reviewing what steps were undertaken in line with the policy and what did or didn’t work. Following this, if there was a recurring issue for a protected characteristic group and it was felt that the Caravan Site Licensing & Fees Policy exacerbated it, immediately undertake a review this section of the policy.

**12. Do you have any additional comments?**

The Cambridge City Caravan Site Licensing & Fees Policy aims to help the council meet our vision of Cambridge as a “great place to live” and a city which strives to ensure that all local

households [of all equalities groups] can secure a “suitable, affordable local home, close to jobs and neighbourhood facilities.”

All individuals as residents could be positively impacted on by this policy encompassing caravan site licensing criteria for the City thus ensuring safety & suitability standards in relation to any such new or existing site operating in the City and ensuring that those who operate them are deemed ‘fit & proper’.

### 13. Sign off

Name and job title of lead officer for this equality impact assessment: Claire Adelizzi, Team Manager - Residential

Names and job titles of other assessment team members and people consulted: Helen Crowther, Equality & Anti-Poverty Officer

Date of EqlA sign off: 05.01.2022

Date of next review of the equalities impact assessment: January 2023

Date to be published on Cambridge City Council website: 10.01.2022

**All EqlAs 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](#)