

# 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>
Tenancy Audits – proposal to make the pilot a permanent project

<b>2. Webpage link to full details of the strategy, policy, plan, project, contract or major change to your service (if available)</b>
Link can be added once committee report is published.

<b>3. What is the objective or purpose of your strategy, policy, plan, project, contract or major change to your service?</b>
Social housing is a valuable asset that provides security and stability to people in housing need. All local authorities have a duty to make the best use of public resources and ensure existing stock is properly managed. Tenancy Audits are necessary to: <ul style="list-style-type: none"><li>• Update the household information.</li></ul>

- Help us to deliver quality and timely services that are tailored to individual needs.
- Ensure the best use of resources and value for money.
- Check the condition of the properties and take the appropriate action where necessary.
- Help identify any customer support needs and to refer them onto specialist agencies for individual support.
- Identify tenancy fraud and other breaches of tenancy.
- Identify households who are under-occupying properties and provide support if they wish to move to smaller properties.
- Identify Housing Need and signpost to the appropriate service area.
- Ward profiling/social value to feed into the wider projects across the Council.

A recommendation is being made to the Housing Scrutiny Committee to make the pilot project a permanent project and agree to incorporate a budget bid into the 2022/24 HRA budget process for the addition of a permanent, full time equivalent Housing Officer to support this work.

Full details of the proposal can be found in the Committee report.

#### 4. Responsible service

Housing 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

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):

CCC Tenants and members of the household  
CCC Housing Services staff

#### 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

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

Due to go to Housing Scrutiny Committee on the 22<sup>nd</sup> September 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?**

At this stage, we have not consulted directly with our tenants. However, we have engaged with our elected tenant and leaseholder representatives for their input on the implementation and outcomes of the tenancy audits so far.

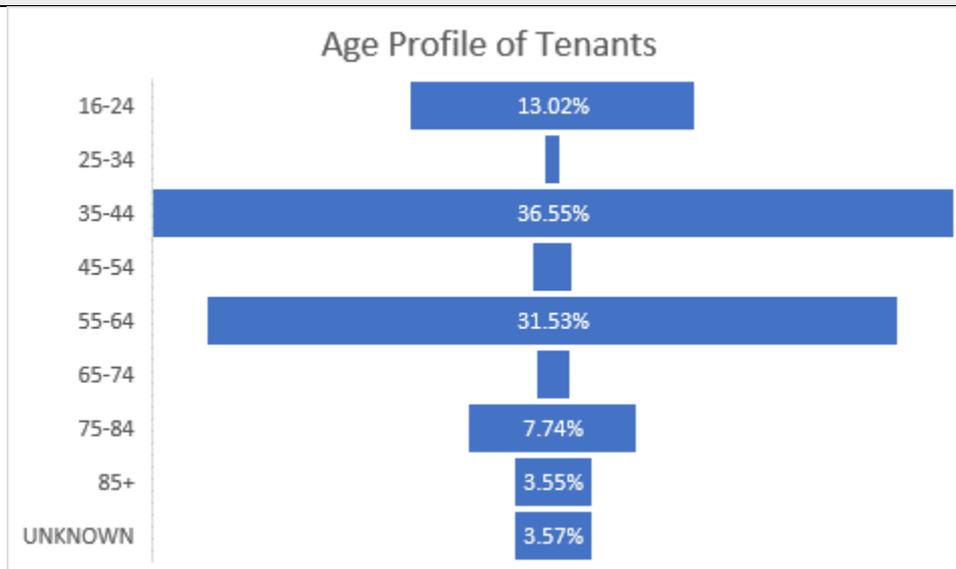
We have researched other social housing providers approaches to conducting tenancy audits in order to compare and gather good practice.

We have used the data that we currently hold about our tenants in order to assess the potential impacts on each category that we collect data on.

## **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**



The above chart shows the age profile of our tenants, most are aged 35-44, with a high proportion aged 55-64. Undertaking the tenancy audits will help us gather more accurate information on the age of our tenants as there is a proportion of 'unknown'.

We have considered the impact of tenancy audits on younger tenants, and younger members of the household, which may result in safeguarding concerns for children. Staff undertaking the audits are well trained in this and will be looking to make safeguarding referrals where appropriate.

Research suggests that young tenants are less likely to know where to go for help when they have housing problems and are less well equipped to maintain their properties. This will be factored into the audits by staff undertaking the visits.

Older tenants are more likely to find themselves residing in unsuitable homes due to health problems and are more likely to be living in homes with spare bedrooms. This will be factored into the audits by staff undertaking the visits.

**(b) Disability**

In our 2020 satisfaction survey of tenants 48% of respondents identified as having a disability, and we anticipate that the tenancy audits will reveal a larger number of tenants or members of their households that consider themselves disabled.

In addition to collecting household information, we will also be asking the tenants about any disabilities. This is to comply with our Public Sector Equality Duties and to ensure that our

communication and the support that we provide individuals through this process is suited to their individual needs. However, tenants are not obliged to answer these questions.

We will ensure support is available tenants who may have learning difficulties with understanding the process or accessing services. This includes alternative formats and languages where necessary as well as interpreting services. We will work with tenants to ensure that any changes resulting from the visits are handled carefully.

Achieving sufficient supply of suitable housing for tenants with physical mobility problems is a challenge, however the audits will help uncover tenant needs that are not currently being met and actions that can be taken to improve living arrangements.

Hidden disabilities, including mental health and other disabilities not readily visible might mean some tenants may not be registered as having a disability unless they decide to disclose it. This may alter the outcome of our services and support for some tenants, making the service less supportive for those with hidden disabilities.

Follow-up communication can take place depending on tenants' preference and needs. All staff are trained to deal with disability and have mental health training.

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

We do not collect information on gender reassignment from our tenants and so are not aware of how many tenants this affects; however given the nature of the proposal we do not anticipate that the tenancy audits will have any adverse effects on this group of individuals.

National data shows that more than a quarter of trans people (28%) in a relationship in the last year have faced domestic abuse from a partner<sup>1</sup>.

Staff are aware that tenants undergoing gender reassignment, or those living with a gender different to what they were assigned at birth are more likely to experience challenges with access to services, mental health and domestic abuse - so this will be considered as part of the visits.

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

We do not collect information on marital status from our tenants and so do not have data about this on record.

The tenancy audits may present an opportunity to uncover relationship breakdown and potential cases of domestic abuse, as evidence shows that family conflict is strongly associated with domestic abuse.

Staff are trained to recognise signs of domestic abuse, identify risk factors and carry out DASH assessments to make a specialist referral.

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<sup>1</sup> [LGBT in Britain – Trans Report \(2017\)](#)

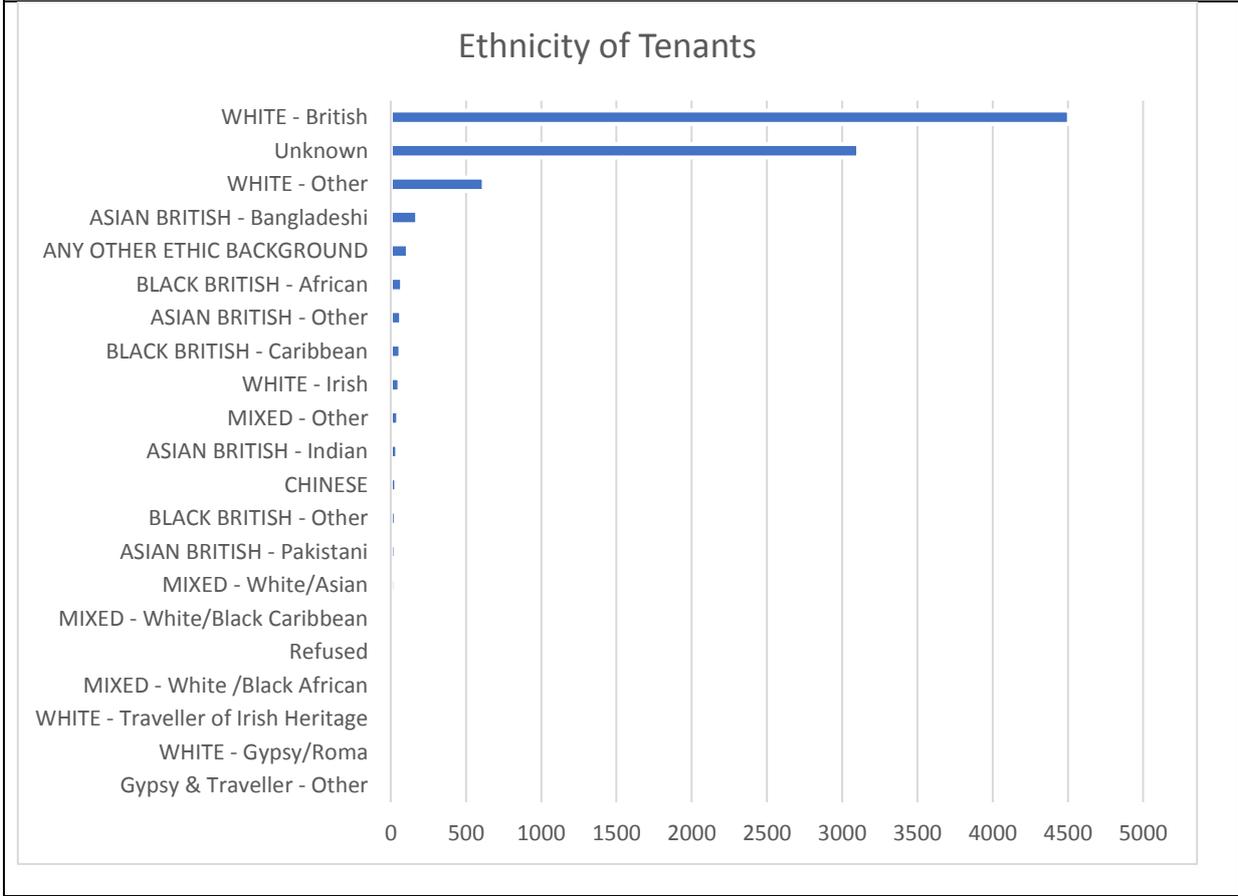


**(e) Pregnancy and maternity**

We do not collect information on pregnancy/maternity status from our tenants. However, a national report outlines that housing directly impacts on maternity care, both during pregnancy and after childbirth. In situations where women are in unstable or inappropriate accommodation without a place where they feel safe to be during labour, or confident returning to with their new-born, the care of both the mother and child is jeopardised<sup>2</sup>.

Staff are aware that pregnant women and new mothers are considered particularly vulnerable, and this will be factored into the visits undertaken and any referrals made.

**(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.**



<sup>2</sup> [Holding it All Together – Birthrights \(2019\)](#)

Data from August 2022 shows that 49.7% of our customers identify as White British and 16.07% identify as coming from an ethnic minority. The ethnicity of 34.42% of our tenants is unknown.

Research has demonstrated that ethnic minority groups are almost twice as likely to live in poverty compared to those who are White British; they also experience disproportionately high unemployment rates and are more likely to work in more insecure forms of employment<sup>3</sup>. This problem is compounded, as those from ethnic minorities experience significantly greater levels of housing need and homelessness, and are more likely to live in poor-quality or overcrowded accommodation. Moreover, studies have shown that ethnic minority households are more likely to be funnelled into the lowest quality and least desirable properties due to various constraints on their housing choices<sup>4</sup>.

Information on ethnicity will be collected as part of the audit process to help fill in the gaps with have with our current data and improve our information base, however these questions are optional. Gathering this data will help us to have a better understanding of our tenants and the potential impacts of services on certain groups. This will enable us to develop future policies aimed specifically at meeting the housing needs of diverse groups of tenants where there is evidence that these needs are not being adequately met.

As part of the tenancy audit visits we will ask tenants about their communication preferences and any language barriers in order to provide an effective service to them. These will be taken into account when we consult with individuals about the changes, for example by using translation services.

### **(g) Religion or belief**

Information on religion or belief will be collected as part of the audit process to help fill in the gaps with have with data, however these questions are optional.

If religion or belief has any impact on how we carry out our tenancy audits, we will ensure the support that we provide individuals through this process is suited to their individual needs.

### **(h) Sex**

Data from August 2022 shows that 58.51% of our tenants identify as female, and 41.49% identify as male.

Whilst all of our tenants will be affected by the tenancy audits, this data suggests that tenancy audits will have a higher general impact on females.

<sup>3</sup> [Healing a divided Britain: the need for a comprehensive race equality strategy – EHRC \(2016\)](#)

<sup>4</sup> [Ethnicity and Social Housing Allocation in England: An Exploratory Analysis of CORE - Kowalewska, H \(2018\)](#)

**(i) Sexual orientation**

Information on sexual orientation will be collected as part of the audit process to help fill in the gaps with have with data, however these questions are optional.

More than one in ten LGBT people (11%) have faced domestic abuse from a partner in the last year. This increases to 17% of black, Asian and minority ethnic LGBT people.<sup>5</sup>

Staff are aware that LGBTQ+ tenants are more likely to experience challenges with access to services, mental health and domestic abuse - so this will be considered as part of the visits. Given that many tenants prefer not disclose their sexual orientation, it may be a challenge to personalise our services to the specific needs of people within this protected characteristic.

**(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 on 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)).**

The tenancy audits have been designed to identify tenant needs and make appropriate referrals/sign posting to relevant organisations and statutory bodies.

There is a particular focus on tenants assisting that are on low incomes and experiencing the impacts of poverty in order to support them in receiving help. This includes connecting them with other services like financial inclusion or benefits and employment advice. Additionally, staff undertaking the visits are identifying support needs and making referrals to services such as a free handyman service, decoration vouchers and food banks.

Equally, the tenancy audit will help us better identify tenants with protected characteristics so that any changes or services that may impacts these groups can be considered.

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<sup>5</sup> [LGBT in Britain - Home and Communities \(2018\)](#)

**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.)**

If the committee report is approved in September, we will produce an action plan to take tenancy audits from pilot to permanent project after March 2023. This will include reviewing the EQIA where any new impacts will be discussed and a plan put in place to mitigate them.

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

No.

**13. Sign off**

**Name and job title of lead officer for this equality impact assessment:** Anna Hill, Housing Services Manager (City Homes)

**Names and job titles of other assessment team members and people consulted:** Kate Grigg, Resident Engagement & Performance Manager

Date of EqIA sign off: 22/08/2022

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

Date to be published on Cambridge City Council website: tbc once HSC report is published.

**All EqIAs need to be sent to Helen Crowther, Equality and Anti-Poverty Officer at [helen.crowther@cambridge.gov.uk](mailto:helen.crowther@cambridge.gov.uk).**