

## Cambridge City Council Equality Impact Assessment (EqIA)

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

Housing Revenue Account Medium Term Financial Strategy 2024/25

### 2. Webpage link to full details of the strategy, policy, plan, project, contract or major change to your service (if available)

<https://democracy.cambridge.gov.uk/ieListDocuments.aspx?CIId=414&MIId=4461>

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

The HRA Medium Term Financial Strategy provides an opportunity to review the assumptions incorporated as part of the longer-term financial planning process. It recommends any changes in response to new legislative requirements, variations in external national and local economic factors and amendments to service delivery methods, allowing incorporation into budgets and financial forecasts at the earliest opportunity. It also allows approval of changes in existing budgets in response to changes in assumptions and also changes in HRA policy where these impact the business plan.

The major change being proposed in this strategy is to introduce rent flexibility to all Cambridge City Council homes. This will increase formula rents on new tenancies by 5% for general needs and temporary accommodation properties and 10% on sheltered and supported accommodation.

Many other local authorities and registered providers are already applying the rent flexibility to formula rents to generate additional revenue to allow investment in services, with new build and energy improvements being key areas of investment.

### 4. Responsible Team and Group

Finance, Corporate Services are responsible for the production of the HRA Medium Term Financial Strategy, but in full consultation with Communities, City Services and Development.

<p><b>5. Who will be affected by this strategy, policy, plan, project, contract or major change to your service?</b></p> <p><b>(Please tick all that apply)</b></p>	<p><input checked="" type="checkbox"/> Residents</p> <p><input type="checkbox"/> Visitors</p> <p><input type="checkbox"/> Staff</p>
<p>Current and future City Council tenants and leaseholders will be affected by this strategy</p>	

<p><b>6. What type of strategy, policy, plan, project, contract or major change to your service is this?</b></p>	<p><input type="checkbox"/> New</p> <p><input checked="" type="checkbox"/> Major change</p> <p><input type="checkbox"/> Minor change</p>
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<p><b>7. Are other departments or partners involved in delivering this strategy, policy, plan, project, contract or major change to your service? (Please tick)</b></p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
<p>Communities, City Services and Development play a key role in the development of this strategy and are responsible for the delivery of the services that it describes.</p>	

<p><b>8. Has the report on your strategy, policy, plan, project, contract or major change to your service gone to Committee? If so, which one?</b></p>
<p>Housing Scrutiny Committee September 2024</p>

<p><b>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?</b></p>
<p>Sources used to identify equality impacts include:</p> <ul style="list-style-type: none"> <li>• UK Poverty 2024: The essential guide to understanding poverty in the UK   Joseph Rowntree Foundation (<a href="http://jrf.org.uk">jrf.org.uk</a>)</li> <li>• Families and households in the UK - Office for National Statistics (<a href="http://ons.gov.uk">ons.gov.uk</a>)</li> <li>• Social housing lettings - GOV.UK Ethnicity facts and figures (<a href="http://ethnicity-facts-figures.service.gov.uk">ethnicity-facts-figures.service.gov.uk</a>)</li> <li>• Outcomes for disabled people in the UK - Office for National Statistics (<a href="http://ons.gov.uk">ons.gov.uk</a>)</li> <li>• Disability Price Tag 2023: the extra cost of disability   Disability charity Scope UK</li> </ul>

## 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

Older people will be impacted to a greater degree by this change as those moving into sheltered housing will be subject to rents at 10% above formula rent. There may also be a disproportionate impact on households with children, where living costs are higher, particularly in a single parent threshold.

It should be noted however, that this is being introduced in part to help fund energy improvement to the housing stock, which will, in turn, reduce tenants' energy bills that will part mitigate against increased cost. Those on low incomes will be able to claim finance assistance in the form of housing benefit, or potentially Universal Credit.

Average rents will still be between 45% and 50% of market rent.

Once implemented from April 2025, all properties will be advertised at the new rent levels, and Financial Inclusion staff will work with any new tenants who may be impacted by this change to ensure that they are claiming all of the financial assistance to which they may be entitled. Also, the authority continues to fund the Citizen's Advice Bureau (CAB), who will also support tenants in ensuring they are aware of wrap around support that may be available, including debt management advice, discretionary housing payments, household support fund and discounts and exemptions.

### (b) Disability

Disabled people may be impacted to a greater degree by this change if they move into sheltered or supported accommodation, which will be subject to rents at 10% above formula rent. Other properties will be subject to a 5% uplift. Nearly 1 in 4 (24.9%) disabled people aged 16 to 64 years in the UK rented social housing compared with fewer than 1 in 10 (7.9%) non-disabled people. 6.3% of council tenants have notified the authority, as landlord, that they consider themselves to

have a disability. Therefore, in general, disabled people are more likely to be impacted. In addition, disabled people already face extra living costs of £975 per month on average (even after Personal Independence Payments (PIP) are taken into account).

It should be noted however, that this is being introduced in part to help fund energy improvement to the housing stock, which will, in turn, reduce tenants' energy bills. Those on low incomes will be able to claim finance assistance in the form of housing benefit or Universal Credit.

Average rents will still be between 35% and 50% of market rent.

Once implemented from April 2025, all properties will be advertised at the new rent levels, and Financial Inclusion staff will work with any new tenants who may be impacted by this change to ensure that they are claiming all of the financial assistance to which they may be entitled. Also, the authority continues to fund the Citizen's Advice Bureau (CAB), who will also support tenants in ensuring they are aware of wrap around support that may be available, including support related to disability, debt management advice, discretionary housing payments, household support fund and discounts and exemptions.

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

No impacts have been identified specific to people with this protected characteristic.

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

A cohabiting couple, including those married or in a civil partnership, who both are in employment, with or without children, may find it easier to meet increased costs than a single person household or single parent with children.

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**(e) Pregnancy and maternity**

Those who are pregnant or on maternity leave may be impacted to a greater degree by this change if they need to move to larger accommodation as a result on lacking a bedroom as properties will be subject to a 5% uplift. They may also feel the impact more due to increased household costs once a child is born / is in infancy. It should be noted however, that this is being introduced in part to help fund energy improvement to the housing stock, which will, in turn, reduce tenants' energy bills. Those on low incomes will be able to claim finance assistance in the form of housing benefit or Universal Credit and may be eligible for Discretionary Housing Payments for a period of time.

Average rents will still be between 35% and 50% of market rent.

Once implemented from April 2025, all properties will be advertised at the new rent levels, and Financial Inclusion staff will work with any new tenants who may be impacted by this change to ensure that they are claiming all of the financial assistance to which they may be entitled. Also, the authority continues to fund the Citizen's Advice Bureau (CAB), who will also support tenants in ensuring they are aware of wrap around support that may be available, including debt management advice, discretionary housing payments, household support fund and discounts and exemptions.

**(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.**

There is the potential for a greater degree of impact for some ethnic groups. In 2022/23, those from a Bangladeshi background spent 40% of their income on rent, and Arab, Black Caribbean, Mixed White / Asian, Mixed White / Black African and Mixed White / Black Caribbean spent 39%, compared with an average of 36% across all ethnic groups. In relation to poverty, many minority ethnic groups, around half of people in Pakistani (51%) and Bangladeshi households (53%) and around 4 in 10 people in households headed by someone from an Asian background other than Indian, Pakistani, Bangladeshi or Chinese (39%) or households from Black African backgrounds (42%) were in poverty between 2019/20 and 2021/22. These households also have higher rates of child poverty, very deep poverty and persistent poverty.

Average rents will still be between 35% and 50% of market rent.

Once implemented from April 2025, all properties will be advertised at the new rent levels, and Financial Inclusion staff will work with any new tenants who may be impacted by this change to ensure that they are claiming all of the financial

assistance to which they may be entitled. Also, the authority continues to fund the Citizen's Advice Bureau (CAB), who will also support tenants in ensuring they are aware of wrap around support that may be available, including debt management advice, discretionary housing payments, household support fund and discounts and exemptions.

**(g) Religion or belief**

No impacts have been identified specific to people with this protected characteristic.

**(h) Sex**

There is the potential for a greater degree of impact on females as opposed to males as a result of implementing this policy. 44% of children in lone-parent families were in poverty in 2021/22. While the majority of lone-parent families are lone-mother families (2.5 million, 84%), in 2022, 16% (457,000) were lone-father families.

Average rents will still be between 35% and 50% of market rent.

Once implemented from April 2025, all properties will be advertised at the new rent levels, and Financial Inclusion staff will work with any new tenants who may be impacted by this change to ensure that they are claiming all of the financial assistance to which they may be entitled. Also, the authority continues to fund the Citizen's Advice Bureau (CAB), who will also support tenants in ensuring they are aware of wrap around support that may be available, including debt management advice, discretionary housing payments, household support fund and discounts and exemptions.

**(i) Sexual orientation**

No impacts have been identified specific to people with 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.**
- **People of any age with care experience – this refers to individuals who spent part of their childhood in the care system due to situations beyond their control, primarily arising from abuse and neglect within their families. The term “Care experience” is a description of a definition in law, it includes anyone that had the state as its corporate parent by virtue of a care order in accordance with the Children Act 1989 and amendments.**
- **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)).**

Those on low incomes may be impacted to a greater degree by this change if they move into council accommodation, with rents charged at 5% or 10% above formula rent. Care leavers are especially likely to experience poverty, so are more likely to have difficulties in paying higher levels of rent. This group are also more likely to have a need for social housing.

The Council have carefully considered the introduction of the rent flexibility. Many other local authorities and registered providers are applying the rent flexibility to formula rents to generate additional revenue to allow investment in services, with new build and energy improvements being a key area of investment. It is important that the Council is able to continue to provide safe, secure, good quality homes and associated services to the most vulnerable in society, with many council tenants being on low incomes.

The rent flexibility is proposed to be introduced in Cambridge in part to help fund energy improvements to the housing stock, which will, in turn, reduce tenants' energy bills. It will also aid other investment in homes to ensure that they are maintained to an appropriate standard. Those on low incomes will be able to claim finance assistance in the form of housing benefit or Universal Credit.

Average rents will still be between 35% and 50% of market rent.

Once implemented from April 2025, all properties will be advertised at the new rent levels, and Financial Inclusion staff will work with any new tenants who may be impacted by this change to ensure that they are claiming all of the financial assistance to which they may be entitled. Also, the authority continues to fund the Citizen's Advice Bureau (CAB), who will also support tenants in ensuring they are aware of wrap around support that may be available, including debt management advice, discretionary housing payments, household support fund and discounts and exemptions.

**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.)**

All properties will be advertised at the new rent levels

Financial Inclusion staff will work with any new tenants who may be impacted by this change to ensure that they are claiming all of the financial assistance to which they may be entitled.

Continue to fund the Citizen’s Advice Bureau (CAB), who will also support tenants in ensuring they are aware of wrap around support that may be available, including support related to disability, debt management advice, discretionary housing payments, household support fund and discounts and exemptions.

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

No additional comments.

**13. Sign off**

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

Julia Hovells, Head of Finance and Business Manager

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

Samantha Shimmon, Assistant Director Housing and Homelessness

Naomi Armstrong, Benefits Manager

Date of EqlA sign off: 5/9/2024

Date of next review of the equalities impact assessment: 21/1/2025

Date to be published on Cambridge City Council website: 5/9/2024

**All EqlAs need to be sent to the Equality and Anti-Poverty Officer at [equalities@cambridge.gov.uk](mailto:equalities@cambridge.gov.uk)**