

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.

****(Note that this EqIA has been agreed by Cambridge City Council. The other Cambridgeshire Districts covered by the policy may have their own EqIAs).***

1. Title of strategy, policy, plan, project, contract or major change to your service
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Cambridgeshire Housing Adaptations, Repairs & Renewals Policy

2. Webpage link to full details of the strategy, policy, plan, project, contract or major change to your service (if available)
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Agenda for Housing Scrutiny Committee on Tuesday, 11th March, 2025, 5.30 pm - Cambridge Council

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

Each of the five District Councils in Cambridgeshire have had an Adaptation & Repairs Policy in place for many years, explaining how mandatory Disabled Facilities Grants (DFGs) and other discretionary grants/loans for home adaptations and improvements (mainly in the private sector) will be awarded to people on low incomes within their Districts.

In 2019, when Disabled Facilities Grant funding from government had started to be channelled through the Integrated Care System's Better Care Fund, a Cambridgeshire-wide approach was adopted to spell out options more clearly, and

to try to gain as much consistency as possible amongst the policies of the five districts.

The policy is based on a review of, and will replace, the existing Cambridgeshire Adaptations & Repairs Policy adopted in 2019.

It proposes a continuation of the same types of financial assistance for eligible applicants on low incomes for adaptations, repairs and improvement to their homes.

It also details some of the help and support which the council's Home Improvement Agency, CambsHIA, may provide in applying for assistance and arranging for work to be carried out.

The policy as whole is expected to cover the five Cambridgeshire District Councils: Cambridge City, East Cambridgeshire, Fenland, Huntingdonshire and South Cambridgeshire District Council. This Equality Impact Assessment is based on the version of the policy aimed at Cambridge City, Huntingdonshire and South Cambridgeshire District council residents, on the basis of having a shared service Home Improvement Agency across the three Districts.

The objectives of the policy, which is aimed at people on low incomes, are:

- To support individuals' choices around living healthily, safely and independently at home
- To help prevent hospital, care home or residential school admission
- To facilitate patients being discharged from hospital and enabling them to live safely and independently at home, including making it easier for carers to provide support
- To prevent the need for higher expenditure elsewhere in the health and/or social care system
- To improve housing conditions and remove hazards in the home (ie Category 1 hazards under the Health & Safety Rating System)

4. Responsible Team and Group

Cambridge City Council: Housing Strategy, together with the other Cambridgeshire Districts: East Cambridgeshire, Fenland, Huntingdonshire and South Cambridgeshire District Council.

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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):

Residents of Cambridgeshire (other than council tenants) requiring financial assistance for disabled adaptations, or for other repairs/improvements to their homes.

6. What type of strategy, policy, plan, project, contract or major change to your service is this?	<input type="checkbox"/> New <input type="checkbox"/> Major change <input checked="" type="checkbox"/> Minor change
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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

Cambridgeshire County Council

NHS Cambridgeshire & Peterborough

Cambridgeshire Home Improvement Agency (Cambs HIA)

East Cambridgeshire & Fenland's Home Improvement Agency

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:

Executive Councillor for Housing and Housing Scrutiny 11 March 2025.

Also through the other four Districts' decision-making processes during February/March 2025.

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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?

Historic service user data

National and local data as referred to in the sections below.

Engagement with staff and partners including:

- Grant Officers and Home Improvement Agencies (HIAs) operating across Cambridgeshire, including CambsHIA.
- People with disabilities and third sector organisations, through Healthwatch Cambridgeshire.
- Cambridgeshire County Council Adult Social Care and Special Educational Needs Commissioners.
- Cambridgeshire Occupational Therapy services.
- The Cambridgeshire & Peterborough Integrated Care Partnership Health & Wellbeing Board.

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: POSITIVE IMPACT

Data

[Census 2021](#)

Percentage of population aged 65 and over:

- Cambridge City: 11.2%
- East Cambridgeshire: 11.2%
- Fenland 22.8%
- Huntingdonshire 20.1%
- South Cambridgeshire 19.7%

[Housing Needs of Specific Groups, Cambridgeshire & West Suffolk, GL Hearn 2021](#)

Expected increase in population aged 65+ with mobility problems between 2020 & 2040:

- Cambridge: 51.3% increase
- East Cambridge: 68.9% increase
- Fenland: 56.7%
- Huntingdonshire: 85.4%
- South Cambridgeshire: 62.1% increase

[Family resources survey 2021 to 2022](#)

- 45% of pension age adults in the UK are disabled.
- The most common impairment amongst disabled State Pension adults was a mobility impairment

[Centre for Ageing Better, The role of home adaptations in later life, 2017](#)

- There is strong evidence that minor home adaptations are an effective and cost-effective intervention for preventing falls and injuries, improving performance of everyday activities and improving mental health.
- There is strong evidence that minor adaptations are particularly effective at improving outcomes and reducing risk when they are combined with other necessary repairs and home improvements, such as improving lighting and removing trip and fall hazards.
- Adaptations may potentially relieve pressures on accident and emergency services, speed hospital discharge and reduce the need for residential care.

[English Housing Survey, Older People's Housing 2020-21](#)

- 15% of older households lived in homes that failed to meet the Decent Homes Standard. Nearly a third of older private renters (30% of households) lived in a non-decent home,

- Older private renters (19% of households) were more likely to have a Category 1 hazard present in their home than owners
- More than half of older households lived in homes that had an Energy Efficiency Rating of D or below.

[Centre for Ageing, The State of Ageing 2022](#)

- More than half of non-decent homes in England & Wales are occupied by someone 55 or older; with the likelihood of living in a non-decent home being highest in the private rented sector.
- Almost a quarter of those aged 75 and over renting privately are at risk from Category 1 Hazards under the Housing Health & Safety Rating System

[Government statistics: Profile of Households & Dwellings 2023](#)

- Households with a Household Reference Person aged 65 or over made up the greatest proportion of the owner-occupied sector (36%).

Impact

Subject to the amount of funding available for each local authority, the policy supports all age groups, including older people, by:

- Clarifying the eligibility criteria for Disabled Facilities Grants
- Providing DFG top-ups for when the national maximum DFG amount payable is not sufficient, and increasing the maximum top-up amount payable from £15,000 to £30,000.
- Providing relocation grants for people who are eligible for DFGs but for whom moving is likely to be a better option
- Providing financial assistance for repairs or improvements, including home energy improvements, to owner-occupiers on low incomes.
- Potentially: preventing falls and injuries amongst older people; improving performance of everyday activities; improving mental health; speeding up hospital discharge; and reducing the need for residential care. (Based on national evidence, although not possible to measure on a local or individual basis).

Younger people: POSITIVE IMPACT

Data

[English Housing Survey Home Adaptations Report 2019-20](#)

- Households with a person aged under 55 that required adaptations were more likely to report that their accommodation was unsuitable (30%) than those that required adaptations in older age groups (20% or less).

[Cambs HIA annual report 2022-23](#)

- 40 DFGs were completed for children with disabilities across Cambridge City, Huntingdonshire and South Cambridgeshire in 2023/24.

Adaptation costs

The cost of adaptations for larger works such as home extensions for children and young people can range from around £40k to £85k, which is higher than the statutory maximum amount payable to an applicant for a DFG.

Impact

Subject to the amount of funding available for each local authority, the policy supports all age groups, including younger people by:

- Clarifying the eligibility criteria for Disabled Facilities Grants to help ensure understanding amongst applicants and professionals of what is available and to whom.
- Continuing to provide DFG top-ups for when the national maximum DFG amount payable is not sufficient, increasing the maximum top-up amount payable from £15,000 to £30,000, and adding that where costs go above this amount cases may be referred to the County Council to be considered under their own obligations. Children and young people with disabilities are more likely than other groups to need need larger scale adaptations such as home extensions. The changes should help cover the rising costs of these types of works, and may help to deliver DFGs more quickly for this group.
- Continuing to providing relocation grants for people who are eligible for DFGs but for whom moving is likely to be a better option.
- Continuing to provide financial assistance for repairs or other home improvements to owner-occupiers on low incomes.
- Taking outgoings into account when assessing a household's financial circumstances in relation to top-up assistance for children's adaptations, potentially making more children and young people eligible for DFGs; (although this would not be measurable as there is no historic data on applications rejected due to not meeting the means test).

(b) Disability

POSITIVE IMPACT

Data

[Census 2021 Disability England & Wales](#)

Percentage of residents who identified as being disabled under the Equality Act with day-to day activities limited a lot:

- Cambridge: 6.2%
- East Cambridgeshire: 5.8%
- Huntingdonshire: 6.1%
- Fenland: 8.4%
- South Cambridgeshire: 5.1%

Percentage of households containing one or more disabled person:

- Cambridge: 28.3%
- East Cambridgeshire: 29.9%
- Fenland: 35.7%
- Huntingdonshire: 29.8%
- South Cambridgeshire: 28.2%

[English Housing Survey Home Adaptations Report 2019-2020](#)

- 8% of all households in England had at least one person with a long-standing physical or mental health conditions and said they required adaptations to their home.
- 81% of households that required adaptation felt their home was suitable for their needs. The 19% that required adaptations and who considered their accommodation unsuitable accounted for 2% of all households in England.
- The number and percentage of households that reported they did not have all the adaptations that they needed has increased from 45% in 2014 to 53% In 2019-20.

[UK Disability Survey research report June 2021](#)

- 47% of disabled people reported that it required at least 'some effort' getting in and out of where they live
- Disabled people reported that fully adapting their homes would significantly improve their lives by increasing their independence and safety; and some reported that moving to accessible housing would improve their lives.

[Social Metrics Commission - 2023 report - Social Metrics Commission](#)

- 58% of all people in poverty in the UK are disabled or living in a family that includes a disabled person.

[National Energy Action 2024](#)

- Estimated that 3.6m people in the UK with a disability would be in fuel poverty from April 2024.

[Public Health England, Disability & Domestic Abuse](#)

- Disabled people experience disproportionately higher levels of domestic abuse than non-disabled people.

Subject to the amount of funding available for each local authority, the policy should support disabled people by:

- Clarifying the eligibility criteria for Disabled Facilities Grants to help ensure understanding amongst applicants and professionals of what is available and to whom.
- Continuing to provide DFG top-ups for those on low incomes when the national maximum DFG amount payable is not sufficient, and increasing the maximum top-up amount payable from £15,000 to £30,000 which may help to speed up delivery of larger scale adaptations.
- Continuing to provide relocation grants for people on low incomes who are eligible for DFGs but for whom moving is likely to be a better option
- Continuing to provide financial assistance for repairs or home improvements to owner-occupiers on low incomes, including energy efficiency, and taking additional opportunities to improve energy efficiency as part of other works.
- Allowing for the means test to be waived in exceptional circumstances at council's discretion – e.g. for someone with a degenerative or rapidly progressing condition or receiving end of life care.
- Clarifying that decisions will be made in the best interest of the disabled person.
- Expecting social landlords to attempt to re-let properties with major adaptations to another disabled person.
- Allowing applicants to be reconsidered for Relocation Allowance if they have to move again due to fleeing domestic violence or abuse.

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(c) Gender reassignment

NO SPECIFIC IMPACTS IDENTIFIED

(d) Marriage and civil partnership

NO SPECIFIC IMPACTS IDENTIFIED

(e) Pregnancy and maternity

NO SPECIFIC IMPACTS IDENTIFIED

(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.

[Census 2021 Protected characteristics by disability status](#)

- The highest age-standardised rates of disability occurred for people who identified with the ethnic groups "White: Gypsy or Irish Traveller" (33.2% in England and 39.1% in Wales) and "Mixed or Multiple ethnic groups: White and Black Caribbean" (22.4% in England and 26.7% in Wales).

[English Housing Survey 2021-2022, housing quality & condition](#)

- Owner-occupier households with an ethnic minority Household Reference Person were slightly more likely to be living in a non-decent home than white owner-occupier households.

[Government statistics: People in low income households 2023](#)

- A report from the Office for National Statistics in 2019 showed that most ethnic minority groups earned less than their white British counterparts. The exceptions were the Chinese, white Irish and Indian ethnic groups. These groups earned a higher typical hourly wage than white British employees.

[Social Metrics Commission: Measuring Poverty 2023](#)

- The rate of poverty is much higher for Black and Minority Ethnic families. 40% of people living in families where the household head is Black/African/Caribbean/ Black British are in poverty, compared to just under 19% of those living in families where the head of household is White.

[Joseph Rowntree Foundation: Bangladeshi, Black African and Pakistani households at higher risk of very deep, long-term poverty, December 2024](#)

- Bangladeshi, Black African and Pakistani households are 2 to 3 times more likely to experience persistent very deep poverty, compared to white households.

Subject to the amount of funding available for each local authority, the policy should support people from ethnic minorities who are on low incomes by:

- Clarifying the eligibility criteria for Disabled Facilities Grants to help ensure understanding amongst applicants and professionals of what is available and to whom.
- Continuing to provide DFG top-ups for when the national maximum DFG amount payable is not sufficient,
- Increasing the maximum top-up amount payable from £15,000 to £30,000, which may speed up the delivery of adaptations for households with children, including ethnic minority households
- Continuing to provide relocation grants for people who are eligible for DFGs but for whom moving is likely to be a better option
- Continuing to provide financial assistance for repairs or other home improvements to owner-occupiers in non-decent homes.

- Clarifying that occupiers of all types and tenures of residential properties are eligible to apply, which may also include Gypsy/Roma/Traveller communities not living in bricks and mortar housing.

(g) Religion or belief

NO SPECIFIC IMPACT IDENTIFIED

(h) Sex

[Census 2021 Disability by Age:](#)

- Women are more likely to be disabled and be limited by their condition or illness than men: In England, 18.7% of females and 16.5% of males were disabled. Of these, 10.8% of females and 9.4% of males said that they were limited a little by a condition or illness, and 7.8% of females and 7.1% of males said they were limited a lot.

[Employment in the UK: April 2024:](#)

- The national employment rate for women, at 71.6%, is lower for women than for men (78.0%) and for the population as a whole (74.5%).

[Cambridge State of the City 2023:](#)

- The female employment rate in Cambridge (City & Fringe) averaged 73.9% in 2022, above the national average of 72.0%, but below the male employment rate of 85.8%, meaning females are 14% less likely to be in employment than males, larger than the national average of 9%. (ONS)
- On a weekly full-time basis, females in Cambridge were paid 14% less than their male counterparts in 2022. This gap has widened in Cambridge over recent years, up from just 3% in 2014. (ONS)

[Gender pay gap in the UK 2024:](#)

- Women tend to be paid less than men. The national pay gap between men and women for all employees in 2024 was 13.1%

Public Health England, Disability & Domestic Abuse

- Women are significantly more likely to experience domestic violence than men, and disabled women are significantly more likely to experience it than disabled men.
- Disabled men experience a similar rate of domestic abuse as non-disabled women.

Subject to the amount of funding available for each local authority, the policy should support both sexes, but women in particular, by:

- Clarifying the eligibility criteria for Disabled Facilities Grants to help ensure understanding amongst applicants and professionals of what is available and to whom.
- Continuing to provide DFG top-ups for when the national maximum DFG amount payable is not sufficient, and increasing the maximum top-up amount payable from £15,000 to £30,000 which may potentially speed up the delivery of larger scale adaptations .
- Continuing to provide relocation grants for people who are eligible for DFGs but for whom moving is likely to be a better option
- Continuing to provide financial assistance for repairs or other home improvements to owner-occupiers in non-decent homes.
- Clarifying that decisions will be made in the best interest of the disabled person.
- Expecting social landlords to attempt to re-let properties with major adaptations to another disabled person.
- Allowing applicants to be reconsidered for Relocation Allowance, or to make further applications for Special Purposes Assistance within 3 years of work being completed, if they have to move again due to fleeing domestic violence or abuse.

(i) Sexual orientation

Census 2021 Protected Characteristics by Disability Status

- The percentage of disabled people who identified as lesbian, gay, bisexual or another minority sexual orientation (6.4% in England and 6.1% in Wales) was

greater than that of non-disabled people (2.6% in England and 2.5% in Wales).

The policy should support disabled LGBTQ people by:

- Clarifying the eligibility criteria for Disabled Facilities Grants to help ensure understanding amongst applicants and professionals of what is available and to whom.
- Continuing to provide DFG top-ups for when the national maximum DFG amount payable is not sufficient and increasing the maximum top-up amount payable from £15,000 to £30,000 which may potentially speed up the delivery of larger adaptations.
- Continuing to provide relocation grants for people who are eligible for DFGs but for whom moving is likely to be a better option.
- Clarifying that decisions will be made in the best interest of the disabled person.
- Expecting social landlords to attempt to re-let properties with major adaptations to another disabled person.

(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_I59kt25q).**

Poverty

POSITIVE IMPACT

(See under different Equalities groups above)

People with care experience

NO SPECIFIC IMPACTS IDENTIFIED

Intersectionality

POSITIVE IMPACT

As detailed above, the following groups with more than one protected characteristic are particularly likely to benefit from the elements of the policy relating to provision of disabled adaptations:

Older people with disabilities:

- Older people are more likely to have mobility problems than other age groups, and there is strong evidence that adaptations and removal of home hazards can improve a number of outcomes for this group

Younger people with disabilities:

- Households aged under 55 who require adaptations are more likely to report that their accommodation is unsuitable than those in older age groups;
- The cost of adaptations for children and young adults such as home extensions is often higher than the statutory maximum payable through a DFG.

Women with disabilities

- Women are more likely to be disabled and limited by their condition and illness than men.

Men with disabilities

- Disabled men experience a similar rate of domestic abuse as non-disabled women.

Disabled people living in poverty

- Over half of all people in poverty in the UK are disabled/living in a family which includes a disabled person. Fuel poverty is also an issue for this group.
- People with disabilities are more likely to experience domestic abuse than non-disabled people.

Ethnic minorities with disabilities

- Disability rates are higher for those identifying as White Gypsy/Irish Traveller, and mixed or multiple ethnic groups, than for other ethnicities.

LGBTQ people with disabilities

- The percentage of LGBTQ people with disabilities is higher than that of non-disabled people.

As detailed above, with the policy aimed at people on low incomes, the following groups with more than one protected characteristic are particularly likely to benefit from the policy overall.

Ethnic minorities living in poverty

- Rates of poverty are higher for black & minority ethnic families than for households headed by a person who is white.

Women living in poverty/on low incomes

- Women tend to be paid less and are less likely to be employed than men.

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.)

No negative impacts have been identified.

The policy as a whole is aimed at people on low incomes, and three of the four types of assistance included in the policy are aimed specifically at people with disabilities.

Ensuring the policy continues to appropriately meet the needs of groups with protected characteristics will be through monitoring the take-up of grants of loans and of satisfaction levels. This will be through CambsHIA, with oversight from the shared service governance board.

CambsHIA will also continue to implement objectives within their Equality, Diversity, Inclusion and Belonging (EDIB) Strategy, including: improving understanding of and identifying opportunities to reach different equalities groups, and making sure their needs are met; and ensuring policies, practices, and initiatives foster a culture of equality, diversity and inclusion.

The EDIB Strategy actions include targeting of services and tailoring of customer engagement towards groups with protected characteristics and those on low incomes. This may include, for example, targeted campaigns at particular groups,

and aligning promotion with national and international celebrations/days related to EDIB work.

A formal assessment of the EDIB Strategy is planned every three years to evaluate progress, pinpoint areas for improvement and make necessary changes.

This EqIA will be updated if a need is identified through ongoing monitoring, and at the point of the next EDIB Strategy assessment in 2027.

12. Do you have any additional comments?

n/a

13. Sign off

Name and job title of lead officer for this equality impact assessment: Helen Reed, Housing Strategy Manager

Names and job titles of other assessment team members and people consulted: Frances Swann, Home Improvement Agency Manager; Helen Crowther, Equality & Anti-Poverty Officer; Suzanne Goff, Health Prevention Programme Officer; Julie Fletcher, Service Manager-Housing Strategy, South Cambridgeshire District Council.

Date of EqIA sign off: 06/02/2025

Date of next review of the equalities impact assessment: If a need is identified through ongoing monitoring, and at the point of the next CambsHIA Equality, Diversity, Inclusion and Belonging Strategy assessment in 2027

Date to be published on Cambridge City Council/CambsHIA website: April 2025

All EqIAs need to be sent to the Equality and Anti-Poverty Officer at equalities@cambridge.gov.uk