



# Equality Impact Assessment (EqIA): Affordable Rents Policy – Annexe to the Housing Strategy

## Introduction – Please read

The Public Sector Equality Duty, introduced under the Equality Act 2010, requires all public bodies, including local authorities, to have due regard to the need to:

- Eliminate unlawful discrimination, harassment, and victimisation
- Advance equality of opportunity between those who share a protected characteristic and those who do not
- Foster good relations between those who share a relevant protected characteristic and those who do not

Equality Impact Assessments (EqIAs) allow the Council to:

- Show that we are meeting this legal duty by demonstrating due regard for the provisions of the Public Sector Equality Duty
- Identify possible negative impacts on individuals and groups with protected characteristics, plan mitigating action and seek to maximise opportunities to advance equality within our activities.

EqIAs provide a methodical approach to the assessment of impacts across the [nine protected characteristics](#) and should be completed during the development and review of all Council policies, strategies, procedures, projects or functions. Where there is any doubt, the completion of an EqIA is always recommended.



Throughout the course of this form, please hover over the [📖] symbol for guidance in relation to specific questions. When the form is completed, please send an electronic copy to [equality.schemes@scambs.gov.uk](mailto:equality.schemes@scambs.gov.uk) and [equalities@cambridge.gov.uk](mailto:equalities@cambridge.gov.uk). If you require any additional support completing the form, please email the above address.

## Equality Impact Assessment Complete Form

### Section 1: Identifying Details

**1.1** Officer completing EqIA:

Julie Fletcher – Head of Housing Strategy

**1.2** Team and Service:

Housing Strategy within the Housing Service on behalf of both South Cambridgeshire District Council and Cambridge City Council.

**1.3** Title of proposal:

Affordable Rents Policy – Annexe to the Housing Strategy

**1.4** EqIA completion date:

29/01/ 2021

**1.5** Proposal implementation date:



Following consultation and approval by both South Cambridgeshire District Council's Cabinet and Cambridge City's Executive Councillor for Housing

**1.6** Who will be responsible for implementing this proposal:

The Housing Strategy service for both South Cambridgeshire District Council and Cambridge City Council, working alongside the Greater Cambridge Planning Service.

## **Section 2: Proposal to be Assessed**

**2.1** Type of proposal:

New policy to be added as an annexe to the Greater Cambridge Housing Strategy 2019-2023.

If other, please specify

**2.2** Is the proposal (New; Review of existing; Change to an established):

New policy

**2.3** State the date of any previous equality impact assessment completed in relation to this proposal (if applicable):

An overall Equality Impact Assessment for the Greater Cambridge Housing Strategy 2019-2023 was completed in February 2019.

**2.4** What are the headline aims of the proposal and the objectives that will help to accomplish these aims? (Approximately 250 words):



The aim of the policy is to set out the objectives for both South Cambridgeshire District Council and Cambridge City Council with regards to how Registered Housing Providers determine new Affordable Rents for social housing in Greater Cambridge. This will seek to keep Affordable Rents at acceptable levels, taking into account the affordability issues and the local market context.

- 2.5** Which of [South Cambridgeshire District Council's business plan](#) priorities does this proposal link to?
- Building homes that are truly affordable to live in - ✓
  - Being green to our core - ✓
- 2.6** Which of [Cambridge City Council's 2019 to 2022 Corporate Plan objectives](#) does this help meet?
- Helping people in Cambridge who have the greatest need ✓
  - Planning for growth and ensuring our new communities are successful ✓
  - Protecting our environment and tackling climate change ✓
- 2.7** Which of South Cambridgeshire District Council's equality objectives (as detailed in [SCDC's Equality Scheme](#)) does this proposal link to or help to achieve?
- Understand the diversity that exists within the South Cambridgeshire population and identify, prioritise and deliver actions that will narrow the gap in outcomes between disadvantaged groups and the wider community. ✓
- 2.8** Which of Cambridge City Council's equality objectives (as detailed in [CCC's Equality Scheme](#)) does this proposal link to or help to achieve?



- To further increase our understanding of the needs of Cambridge's growing and increasingly diverse communities so that we can target our services effectively. ✓
- To continue to work to improve access to and take-up of Council services from all residents and communities. ✓
- To tackle discrimination, harassment and victimisation and ensure that people from different backgrounds living in the city continue to get on well together. ✓

**2.9** Which groups or individuals will the proposal affect:

- Service Users – housing register applicants and social housing tenants ✓
- External Stakeholders ✓
- Employees
- Councillors
- Other –

If other, please specify

**2.10** How will these groups or individuals be affected? (you will be asked to provide more detail on the specific impacts on different protected characteristic groups later on in the form) (approximately 250 words).

The policy aims to ensure that Affordable Rents remain affordable to those most in need of housing on lower incomes.

**2.11** How many people will this proposal affect? (Approximately)

It would potentially impact on all applicants, as they may decide not to bid on new homes or subsequent relets of those homes if rents are too high.

It would also impact in future years on those who have become tenants as their rents would only be able to rise in line with the regulatory rent formula.



2.12 If any part of the proposal is being undertaken by external partners, please specify how the Councils will ensure that they will meet equality standards?  
(Approximately 250 words)

N/A.

2.13 The consultation will follow the [City's guidance on undertaking consultations](#) in relation to accessibility and inclusiveness.

2.14 All documents have been prepared following [Cambridge City Council Accessibility Statement](#) and [South Cambridgeshire District Council Accessibility Statement](#).

2.15 Through the City Council's interpretation and translation service, the consultation and policy documents can be made available in different languages upon request.

### Section 3: Evidence and Data

3.1 Describe any research (this could include consultation) and analysis you have undertaken to understand how [protected characteristic groups](#) are likely to be affected? Please list any key sources that you used to obtain this Information. 

The research is based on those households on lower quartile household incomes (nationally published data), and what would be considered an affordable rent based on their household costs. It pulls together existing data on previous rent levels based on pre-covid Local Housing Allowance (LHA) rates and looks at the impacts if Affordable Rents are still based on the current LHA rates which have increased significantly. In drafting this policy,



consultation has been undertaken with both key officers and councillors, before going out to public consultation.

(Approximately 250 words)

- 3.2** Describe any research (this could include consultation) and analysis you have undertaken to understand any effects on any other groups of people not mentioned in the nine [protected characteristic groups](#) (for example people who live in rural areas, who live in areas of high growth, or from low income backgrounds).

The draft policy will be advertised for public consultation via both Cambridge City and South Cambs website. As the impacts of this policy will affect registered housing providers, they will also be consulted separately as part of the public consultation. In drafting the policy, consideration has been given to both the affordability of residents but also the viability for registered housing providers to bring forward affordable housing. The Equality Impact Assessment will be reviewed following the results of the public consultation before final approval of the Policy.

The following pieces of research have also been taken into consideration in the completion of the Equality Impact Assessment and the draft Policy:

- [Joseph Rowntree Foundation – UK Poverty 2019/20](#)
- [English Housing Survey 2017-18 social housing report](#)

The Equality Impact Assessment will be updated following the results of the public consultation before final approval of the Policy.

(Approximately 250 words)



- 3.3** If you have not undertaken any consultation, please detail why not, or when consultation is planned to take place.

Member and Officer briefings have been undertaken as part of the development of the draft Policy, with key officers inputting into the final draft. Member approval of the draft policy has been sought before public consultation. It is anticipated that the public consultation will take effect from early February 2021, which will also involve specific consultation with key stakeholders, such as registered housing providers operating in the area. (Approximately 250 words)

## **Section 4: Impact of proposal on those with protected characteristics**

### **4.1 Age:**

- 4.1.1** Has your research identified that the proposal will have an impact on this protected characteristic?

No – the policy is likely to have a positive impact on low income households, the majority of whom are likely to be of working age.

**If you have selected no – please move forward to question 4.2 Disability  
If you have selected yes – please continue below (4.1.2)**

- 4.1.2** Describe the impacts of the proposal on this protected characteristic group identified through your research, including
- whether each impact is positive, neutral or negative

- whether it is a high, medium or low impact. 📖
- approximately 250 words per impact

**4.1.3** Please complete the table below to detail actions that need to take place to minimise the negative and maximise the positive impacts raised in the previous question:

Action	Responsible Officer	Timescale for completion	How will the actions be monitored?

## 4.2 Disability:

**4.2.1** Has your research identified that the proposal will have an impact on this protected characteristic?

Yes. The objective of the policy is to ensure rents are affordable to low income households regardless of disability and therefore will have a positive outcome for those disabled households where their rent is not fully covered by housing benefit or the housing element of Universal Credit. Those with a disability are more likely to experience poverty than able bodied people, and may be more likely to require social housing. [source: [Joseph Rowntree Foundation – UK Poverty 2019/20](#)]

[The English Housing Survey 2017-18 social housing report](#) states that 54% of households in the social rented sector had at least one household member who had a disability or long-term illness, compared to 31% of owner occupiers and 23% of private renters.



The Joseph Rowntree Foundation and English Housing Survey findings both suggest that this policy could have a positive impact on disabled households if they do not receive full housing benefit or the housing element of Universal Credit to cover their rent.

**If you have selected no – please move forward to question 4.3 Gender Reassignment**

**If you have selected yes – please continue below (4.2.2)**

**4.2.2** Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 📖
- approximately 250 words per impact

The policy has a low positive impact for the reasons stated above.

**4.2.3** Please complete the table below to detail actions that need to take place to minimise the negative and maximise the positive impacts raised in the previous question:

Action	Responsible Officer	Timescale for completion	How will the actions be monitored?
For the consultation process - all documents produced will follow the Councils'	Julie Fletcher – Head of Housing Strategy  Helen Reed – Housing Strategy Manager	March 2021	Documents will be checked using the accessibility tool.

<p>Accessibility Statement - <a href="#">Cambridge City Accessibility Statement South Cambridgeshire District Council Accessibility Statement</a></p>			
<p>The consultation will be targeted at all those on the housing register, which will include older people</p>	<p>Julie Fletcher – Head of Housing Strategy  Helen Reed – Housing Strategy Manager</p>	<p>March 2021</p>	<p>Assurance check that emails have been sent out to individuals on the housing register</p>
<p>Following the end of the consultation period the Equality Impact Assessment will be updated to take into account any comments received.</p>	<p>Julie Fletcher – Head of Housing Strategy  Helen Reed – Housing Strategy Manager</p>	<p>May 2021</p>	<p>Review of consultation responses</p>
<p>The consultation will be targeted at housing providers who provide</p>	<p>Julie Fletcher – Head of Housing Strategy</p>	<p>March 2021</p>	<p>Briefing session to be held with housing providers. Comments to feed into the consultation responses.</p>

homes for older people.	Helen Reed – Housing Strategy Manager		
Once the policy is adopted, to ensure the policy is followed as part of any new housing development	Housing Development Officer	To be completed as part of approval of housing schemes in accordance with the S.106 Agreement obligations.	Rental levels to be agreed as part of approval of housing schemes and monitored through Home Link

### 4.3 Gender Reassignment:

**4.3.1** Has your research identified that the proposal will have an impact on this protected characteristic?

No. The objective of the policy is to have a positive outcome for low income households in social housing in general.

**If you have selected no – please move forward to question 4.4 Marriage and Civil Partnership**

**If you have selected yes – please continue below (4.3.2)**

**4.3.2** Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 
- approximately 250 words per impact



**4.3.3** Please complete the table below to detail actions that need to take place to minimise the negative and maximise the positive impacts raised in the previous question:

Action	Responsible Officer	Timescale for completion	How will the actions be monitored?

#### 4.4 Marriage and Civil Partnership:

**4.4.1** Has your research identified that the proposal will have an impact on this protected characteristic? No. The objective of the policy is to have a positive outcome for low income households in social housing, regardless of their marital status.

**If you have selected no – please move forward to question 4.5**

#### **Pregnancy and Maternity**

**If you have selected yes – please continue below (4.4.2)**

**4.4.2** Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 📖
- approximately 250 words per impact

**4.4.3** Please complete the table below to detail actions that need to take place to minimise the negative and maximise the positive impacts raised in the previous question:



Action	Responsible Officer	Timescale for completion	How will the actions be monitored?

#### 4.5 Pregnancy and Maternity:

**4.5.1** Has your research identified that the proposal will have an impact on this protected characteristic?

No. The objective of the policy is to have a positive outcome for low income households in social housing.

**If you have selected no – please move forward to question 4.6 Race  
If you have selected yes – please continue below (4.5.2)**

**4.5.2** Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 📖
- approximately 250 words per impact

**4.5.3** Please complete the table below to detail actions that need to take place to minimise the negative and maximise the positive impacts raised in the previous question:

Action	Responsible Officer	Timescale for completion	How will the actions be monitored?



## 4.6 Race:

**4.6.1** Has your research identified that the proposal will have an impact on this protected characteristic?

Yes. The Joseph Rowntree Foundation research mentioned above also states that BME workers are more at risk of poverty than the general population and therefore it is likely that this policy will have a positive impact on BME households as it aims to create mixed and inclusive communities.

**If you have selected no – please move forward to question 4.7 Religion or Belief**

**If you have selected yes – please continue below (4.6.2)**

**4.6.2** Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 📖
- approximately 250 words per impact

The policy is likely to have a low positive impact on BME households.

**4.6.3** Please complete the table below to detail actions that need to take place to minimise the negative and maximise the positive impacts raised in the previous question:

Action	Responsible Officer	Timescale for completion	How will the actions be monitored?
Through the City Council's interpretation and	Helen Reed – Housing Strategy Manager	Open ended – upon request	A record will be kept of any requests for the

translation service, the consultation and policy documents can be made available in different languages upon request.	Julie Fletcher – Head of Housing Strategy		documents in a different language.
Following the end of the consultation period the Equality Impact Assessment will be updated to take into account any comments received.	Julie Fletcher – Head of Housing Strategy  Helen Reed – Housing Strategy Manager	May 2021	Review of consultation responses

#### 4.7 Religion or Belief:

**4.7.1** Has your research identified that the proposal will have an impact on this protected characteristic?

No. The objective of the policy is to have a positive outcome for low income households in social housing, regardless of their religion or belief.

**If you have selected no – please move forward to question 4.8 Sex**

**If you have selected yes – please continue below (4.7.2)**



**4.7.2** Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 
- approximately 250 words per impact

**4.7.3** Please complete the table below to detail actions that need to take place to minimise the negative and maximise the positive impacts raised in the previous question:

Action	Responsible Officer	Timescale for completion	How will the actions be monitored?

## 4.8 Sex:

**4.8.1** Has your research identified that the proposal will have an impact on this protected characteristic?

No. The objective of the policy is to have a positive outcome for low income households in social housing, regardless of their sex.

**If you have selected no – please move forward to question 4.9 (Sexual Orientation)**

**If you have selected yes – please continue below (4.8.2)**

**4.8.2** Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 



- approximately 250 words per impact

**4.8.3** Please complete the table below to detail actions that need to take place to minimise the negative and maximise the positive impacts raised in the previous question:

Action	Responsible Officer	Timescale for completion	How will the actions be monitored?

#### 4.9 Sexual Orientation:

**4.9.1** Has your research identified that the proposal will have an impact on this protected characteristic?

No. The objective of the policy is to have a positive outcome for low income households in social housing, regardless of their sexual orientation.

**If you have selected no – please move forward to question 4.10 (Other)**  
**If you have selected yes – please continue below (4.9.2)**

**4.9.2** Describe the impacts of the proposal on this protected characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 
- approximately 250 words per impact

**4.9.3** Please complete the table below to detail actions that need to take place to minimise the negative and maximise the positive impacts raised in the previous question:



Action	Responsible Officer	Timescale for completion	How will the actions be monitored?

#### 4.10 Other: (e.g. rurality, growth, socio-economic status etc.).

**4.10.1** Has your research identified that the proposal will have an impact on this characteristic group?

Yes – social-economic status.

**If you have selected no – please move forward to question 5.1**

**If you have selected yes – please continue below (4.10.2)**

**4.10.2** Describe the impacts of the proposal on this characteristic group identified through your research, including

- whether each impact is positive, neutral or negative
- whether it is a high, medium or low impact. 📖
- approximately 250 words per impact

In terms of socio-economic status, the Joseph Rowntree Foundation has identified that social sector rents have become increasingly less affordable over time, risking faster than inflation and taking up an increasingly high proportion of income.

The policy is aimed at those households on low incomes with the aim of the policy to have a positive impact to ensure rents are kept at acceptable levels in terms of affordability.

**4.10.3** Please complete the table below to detail actions that need to take place to minimise the negative and maximise the positive impacts raised in the previous question:

Action	Responsible Officer	Timescale for completion	How will the actions be monitored?
The consultation will be targeted at all those on the housing register, which will include low income households	Julie Fletcher – Head of Housing Strategy  Helen Reed – Housing Strategy Manager	March 2021	Assurance check that emails have been sent out to individuals on the housing register
The consultation will be targeted at housing providers who provide social housing	Julie Fletcher – Head of Housing Strategy  Helen Reed – Housing Strategy Manager	March 2021	Briefing session to be held with housing providers. Comments to feed into the consultation responses.
Following the end of the consultation period the Equality Impact Assessment will be updated to take into account any comments received.	Julie Fletcher – Head of Housing Strategy  Helen Reed – Housing Strategy Manager	May 2021	Review of consultation responses



<p>Once the policy is adopted, to ensure the policy is followed as part of any new housing development</p>	<p>Housing Development Officer</p>	<p>To be completed as part of approval of housing schemes in accordance with the S.106 Agreement obligations.</p>	<p>Rental levels to be agreed as part of approval of housing schemes and monitored through Home Link</p>
--	------------------------------------	---	--

## Section 5: Summary

- 5.1** Briefly summarise the key findings of the EqIA and any significant equality considerations that should be taken into account when deciding whether or



not to proceed with the proposal (this section can be included within the 'equality implications' section of any committee reports). (Approximately 250 words)

The policy looks to ensure that Affordable Rents are kept at an affordable level for those households on low incomes. It has a positive impact for all protected characteristics that may also fall within a low income household but does not differentiate between the various protected characteristics and treats everyone equally and fairly.

**5.2** Confirm the recommendation of the officer completing the EqIA (delete as appropriate):

- Approved (No major change): Your analysis demonstrates that the policy is robust, and the evidence shows no potential for discrimination and that you have taken all appropriate opportunities to advance equality and foster good relations between groups.

**5.3** Signature of individual completing EqIA: *Lulie Fletcher*

**5.4** Date of completion: 22/02/2021

## **Section 6: Sign Off**

**6.1** Approving officer EqIA review outcome: (delete as appropriate):

- Approved (No major change): Your analysis demonstrates that the policy is robust, and the evidence shows no potential for discrimination and that you have taken all appropriate opportunities to advance equality and foster good relations between groups.



- **A6.2** Do you give permission to publish this EqIA on SCDC and Cambridge City websites (delete as appropriate)? If no, please state reason

**6.3** When will this proposal next be reviewed and who will this be?

The EQIA will be reviewed following the close of the public consultation in March 2021.

**6.4** Approving officer signature:

Peter Campbell – Head of Housing Strategy  
South Cambridgeshire District Council

Helen Reed – Housing Strategy Manager, Cambridge City Council

**6.5** Date of approval: 22/02/2021

Please send a copy to [Equality.Schemes@scambs.gov.uk](mailto:Equality.Schemes@scambs.gov.uk) and [equalities@cambridge.gov.uk](mailto:equalities@cambridge.gov.uk)