

# **Camden Council Equality Impact Assessment Form**

# Camden Council Equality Impact Assessment Form

Before beginning this equality impact assessment (EqIA) form, you should use the [EqIA screening tool](#) to decide whether you need to complete an EqIA for your activity and read the [EqIA guidance](#).

The term “activities” is used by the Council to mean a range of things, such as policies, projects, functions, services, staff restructures, major developments or planning applications.

Most significant activities that affect Council stakeholders will require an EqIA when they are in the planning stage. Many will also require an EqIA to monitor their impact on equality over time or if there is a significant change that prompts a review, such as in local demographics.

EqIAs help the Council to fulfil its legal obligations under the Equality Act’s public sector equality duty. The duty requires the Council to have due regard<sup>1</sup> to the need to:

- eliminate unlawful behaviour, such as discrimination, harassment and victimisation;
- promote equality of opportunity between those who share a protected characteristic and those who don’t; and
- promote good relations between people who share a protected characteristic and those who don’t.

The way that we demonstrate that we have due regard for these three aims, and therefore that we are complying with the public sector equality duty, is by undertaking an EqIA.

EqIAs will almost certainly be required when a new activity affecting people who share the protected characteristics is being developed and when reviewing or changing such activities.

They will also be likely required before and during any staff re-organisations.

An EqIA should be started at the beginning of a new activity and developed in parallel with it. Activities such as services and projects should also be regularly reviewed for their impact.

An EqIA should be revisited and updated to determine whether any planned positive impacts have been achieved and whether any identified negative impacts have been mitigated. You can indicate the version of the EqIA below.

For more complex enquiries on EqIAs, in the first instance please contact [equalities@camden.gov.uk](mailto:equalities@camden.gov.uk) where you will be able to receive dedicated support.

EqIAs should be signed off by the relevant sponsor, director or Head of Service.

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1 [Due regard](#) is a legal requirement and means that decision makers have to consider the equality implications of a proposal before a commissioning or policy decision has been made that may affect people who share each of the protected characteristics. Paying 'due regard' means giving a proportionate amount of resource to this analytical exercise relevant to the potential impact on equality.

| Title of the activity   |                                      |
|---|--------------------------------------|
| Council tenant rent and service charge increases April 2024         |                                      |
| Officer accountable for the EqIA (e.g. director or project sponsor) |                                      |
| Full name:  | Glendine Shepherd                    |
| Position:   | Director of Housing                  |
| Directorate:  | Supporting Communities               |
| Email:  | glendine.shepherd@camden.gov.uk      |
| Lead person completing the EqIA (author)                            |                                      |
| Full name:  | Jo Adams                             |
| Position:   | Landlord Services Manager            |
| Directorate:  | Supporting Communities               |
| Email:  | Jo.adams@camden.gov.uk               |
| Person reviewing the EqIA (reviewer)                                |                                      |
| Full name:  | Emma Cardoso                         |
| Position:   | Team Leader (HRA & Capital Projects) |
| Directorate:  | Corporate Services                   |
| Email:  | Emma.Cardoso@camden.gov.uk           |
| Version number and date of update                                   |                                      |
| 1. 6 December 2023<br>2. 3 January 2024<br>3. 10 January 2024       |                                      |

## Step 1: Clarifying aims

1. a. Is it a new activity or one that is under review or being changed?

- New  
 Under review  
 Being changed

1. b. Which groups are affected by this activity?

- Staff  
 Residents  
 Contractors  
 Other (please detail):

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## 1. c. Which Directorate does the activity fall under:

- Supporting People  
 Supporting Communities  
 Corporate Services  
 More than one Directorate. Please specify:

## 1.d Outline the aims/objectives/scope of the activity. (You should aim for a summary, rather than copying large amounts of text from elsewhere.)

The proposals reviewed in this Equality Impact Assessment (EqIA) are:

- i) A proposed increase in council rents of 7.7% (CPI plus 1%) from April 2024 (paragraph 3.4).
- ii) An increase shared ownership rents by CPI + 1% (7.7%) (paragraph 3.9).
- iii) Revised tenant service charges for caretaking, CCTV, communal lighting, communal mechanical and electrical maintenance, grounds maintenance and the Responsive Security Patrol (paragraph 3.15).
- iv) A 7.7% increase in service charges for Housing Revenue Account (HRA) hostels and supported housing (as set out in paragraph 3.17).
- v) Retaining heating and hot water charges at current 2023/24 levels (net of the credits) to repay the deficit incurred by the heating pool to the HRA reserve
- vi) An increase in resident garage rents from £14 a week to £16 a week from 2024/25 in line with the Medium Term Financial Strategy savings strategy (paragraph 3.18)
- ix) A package of new savings as set out in paragraphs 3.27-3.28.
- x) Exemption from call in for the items listed above, provided the Chair of Housing Scrutiny Committee agrees, so that tenants can receive the required four weeks notice of any rent increases before the start of the new financial year.

The reasons for these proposals:

The Council's Housing Revenue Account (HRA) includes the Council's housing income (mainly council tenant rents and service charges) alongside housing costs. There is a legal requirement for these to balance and, as a result, HRA income and expenditure are regularly reviewed. There is also a requirement that the HRA is kept separate from other council income and costs in the General Fund.

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Current pressures on the HRA are detailed in part 1 of the report that this Equality Impact Assessment (EIA) accompanies. They include the impact from a Government requirement between 2016–2020 that tenant rents reduce by 1% each year, extensive fire and building safety improvements, works to address damp and mould and costs associated with new regulatory requirements for social landlords.

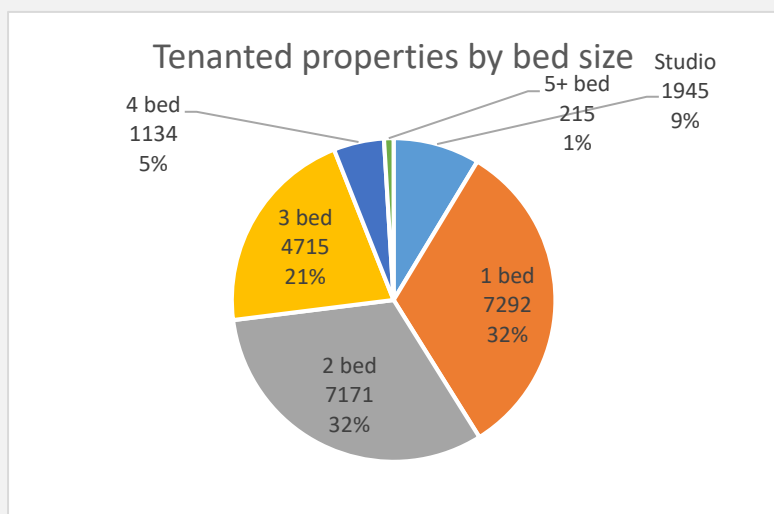
## Increasing council rents

Due to these pressures, and to minimize impact on housing services, it is proposed that council tenant rents increase by 7.7% from the start of April 2024. This is the maximum permitted by the Government’s current cap on social housing rents. Tenants who receive housing benefit (HB) or Universal Credit (UC) to cover their housing costs will not be impacted so long as they continue to receive those benefits at the same level.

Tenants receiving benefits to cover part of their housing costs are also unlikely to pay more unless the shortfall is due to a benefit cap or the bedroom tax being in place and this is covered in more detail below. A table in paragraph 3.4 of the report shows what the increase could mean for other tenants on an average rent for each bedroom size:

| Bed size | Average Rent 23/24 | Increase 7.7% | Average Rent 24/25 7.7% |
|----------|--------------------|---------------|-------------------------|
| 0        | £97.28             | £7.49         | £104.77                 |
| 1        | £115.87            | £8.92         | £124.79                 |
| 2        | £131.49            | £10.12        | £141.62                 |
| 3        | £147.40            | £11.35        | £158.75                 |
| 4        | £163.77            | £12.61        | £176.38                 |
| 5 +      | £180.19            | £13.87        | £194.06                 |

There are currently (as at 20 December 2023) 21,838 council tenancies. The chart below shows how the Council’s stock breaks down by bedroom size:



It is also intended to apply a rent increase of 7.7% to eleven shared ownership tenants.

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## Council tenant service charge increases

The proposed increases in tenant service charges are set out in the table below. These reflect inflation and increased costs. Tenants living on estates or in blocks of flats will have service charges to pay. The proposed increases will add a maximum £1.24 per week or (£5.38 per month) to the charge for tenants benefiting from all of these services. Service charges are included within the housing costs paid for by housing benefit or Universal Credit when tenants have their housing costs covered by these benefits

| Tenant weekly service charges | 2023/24 weekly charge | 2024/25 weekly increase | 2024/25 weekly charge | % change |
|-------------------------------|-----------------------|-------------------------|-----------------------|----------|
| Caretaking                    | £11.27                | £0.56                   | £11.83                | 5%       |
| Communal Lighting             | £2.78                 | £0.31                   | £3.09                 | 11%      |
| CCTV                          | £1.09                 | £0.05                   | £1.14                 | 4.7%     |
| Communal M&E Maintenance      | £1.39                 | £0.06                   | £1.45                 | 4.7%     |
| Ground Maintenance            | £2.05                 | £0.21                   | £2.26                 | 10%      |
| Responsive Housing Patrol     | £0.70                 | £0.05                   | £0.75                 | 7%       |
|                               | <b>£19.28</b>         | <b>£1.24</b>            | <b>£20.52</b>         |          |

## Proposed increases in supported housing charges

These proposed increases are intended to ensure that the Council's hostels and other forms of supported housing remain self-financing. A table at paragraph 3.17 in the report shows what the 7.7% increase in these charges would mean.

| Weekly rental charges to residents           | 2023/24 | 2024/25 | Increase 7.7% |
|--|---------|---------|---------------|
| Cleaning                                     | £57.03  | £61.42  | £4.39         |
| Cleaning self-contained                      | £36.25  | £39.04  | £2.79         |
| Concierge (where applicable)                 | £90.22  | £97.17  | £6.95         |
| Amenity Charge Single                        | £17.28  | £18.61  | £1.33         |
| Amenity Charge Couple                        | £29.65  | £31.93  | £2.28         |
| Amenity Charge Communal                      | £4.54   | £4.89   | £0.35         |
| Sheltered Housing Enhanced Management Charge | £50.76  | £54.67  | £3.91         |

The enhanced management fee for sheltered housing tenants would increase by £3.91 per week to £54.67. There are currently (20 December 2023) 745 sheltered housing tenancies.

Other than the amenity charges for single people and couples (which is support related and due to increase by either £1.33 or £2.28 per week), these charges are

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also included within the housing costs that will be covered by benefits so tenants / residents should not have more to pay if benefits already cover these costs.

## District heating and hot water charges

In April 2023 charges for tenants who pay fixed heating charges to the Council increased by 125% after a credit was made to the heating pool to reduce what would otherwise have been an increase of 175%. It is proposed that tenants continue to pay the same charges after April 2024 although gas prices have reduced. This is to repay the HRA reserve for the deficit created in previous years.

11,192 tenanted (51% of all tenants) and 3,978 leasehold properties receive district-heating services and/or gas supplies from the Council. This includes approx. 8807 tenants on fixed heating and hot water charges.

As an illustration, a tenant on scale A1 in a two bedroom home on the highest heating charge level (for heating, hot water and cooking gas) would continue to pay £44.35 per week from April 2024.

## An increase in resident garage rents from £14 a week to £16 a week

This extra income is part of the three-year savings strategy for the HRA, which will raise an additional £0.13m in 2024/25 towards the costs of running these assets.

Garage charges increased from £12 to £14 per week in April 2023. Before that they had been £12 per week since 2009.

The Council has 1575 tenanted garages. We prioritise applications and allocate garages as follows:

1. Tenants and leaseholders resident on the estate – blue badge holders take priority
2. Blue badge holders on neighbouring estates
3. Tenants and leaseholders on neighbouring estates
4. Tenants and leaseholders on all other estates
5. Business, private lettings and staff

Tenants and leaseholders with a disability who hold a blue badge and who are allocated a garage (or parking space) to park on the Council's estates have the charge waived (unless they have more than one parking facility in which case only one charge will be waived). Other blue badge holders receive discounted charges.

## New Savings proposals

These are set out in the table below:

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| Savings description  | 2024/25 saving £m | Category |
|--|-------------------|----------|
| Programme reactive works & limit discretionary repairs       | 0.290             | B        |
| Changes to roofing and drainage resourcing                   | 0.315             | B        |
| Relet at target rents for existing tenants (with exceptions) | 0.240             | B        |
| Eliminate unnecessary vehicle usage                          | 0.400             | A        |
| Review of playground charges                                 | 0.200             | A        |
| Review of charges for CIP resourcing                         | 0.527             | A        |
| Reduction of agency staff in repairs                         | 0.213             | B        |
| Review of decoration & renewals in void properties           | 0.209             | B        |
| Review of practices such as refuse containers                | 1.056             | A        |
| Policy change- parking exemption for Camden's repairs fleet  | 0.450             | B        |
| <b>Total</b>   | <b>3.900</b>      |          |

The report sets out details of the new savings needed to fund the HRA budget in 2024/25 in paragraphs 3.27-3.28 and summarised in the table above. They have been classified into categories A or B:

A. The proposal is suitable for immediate implementation (it doesn't require consultation or equalities consideration) and delegated authority should be given to the relevant Director(s) for immediate implementation.

B. A decision in principle should be sought, with a delegation to the relevant Director(s) (in consultation with the relevant Cabinet Member) to: (i) decide whether and how to implement, and if appropriate thereafter to implement, each of the proposals identified, having had due regard to the Council's general equality duties, any other applicable legal duties and the results of any consultation undertaken in respect of the proposal. (ii) undertake any necessary consultation. (iii) make any necessary redundancies, including any proposals involving more than 20 redundancies.

This report, in terms of budget reductions and savings, seeks to make decisions now or delegate them to an officer. It therefore follows that the outcome of these decisions may lead to further amendments and/or changes to the proposals including that the proposal may not, as a result of this detailed further consideration, be put into effect.

With regard to equalities, officers have considered these in the round and it is not considered that the proposals will have an adverse impact. However, given the varied nature and time scales impacting the proposed decisions, this is only a preliminary consideration. For those decisions which are being asked to be taken now (Category A), and therefore the immediate implications arising from this report, there are no equalities impacts associated with those proposals. As can be seen for proposals in Category B, further decision-making is required during which equalities will be fully considered by the decision makers.

Full EIAs will be completed on all relevant proposals. These offer the opportunity to consider more deeply and broadly the equalities implications of a proposal and to make the required mitigations, or in the absence of these, to explain the approach adopted where no better alternative is available to the Council. The potential for adverse impact; for



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indirect or direct discrimination, along with the possibility for advancing equal opportunity and for fostering good relations will be considered in each EIA.

Individual savings proposals will impact different groups of residents and staff in different ways. Where they represent proportionate steps to enable and demonstrate due regard for the need to achieve the aims of the Public Sector Equality Duty, EIAs will be undertaken on relevant savings proposals so that they can be considered prior to these final decisions being made on whether and how to implement them. Decision-makers will therefore be able to discharge their Public Sector Equality Duty in the course of making decisions on savings proposals.

EIAs will be prepared and considered so that potential impacts can be identified, appropriate mitigations agreed where necessary, and opportunities to further advance equality identified. These will help to ensure that decisions on the savings proposals listed above can be made with due regard for the need to achieve the three aims of the public sector equality duty. These EIAs will set out the equalities profile of the affected groups, including data on socio-economic characteristics in light of the cost of living crisis and the various interplays between socio-economic status, the protected characteristics, and Camden Council's services. Camden will strive to ensure that these savings proposals do not disproportionately impact people who share protected characteristics, and we will use an intersectional lens when undertaking EIAs on relevant savings proposals.

Measures to avoid and/or mitigate potential negative impacts of savings proposals will be set out in the EIAs for those savings proposals that require them as and when they come forward for decisions by Directors under delegated authority and in consultation with the relevant Cabinet Member.

## Step 2: Data and evidence

What data do you have about the people affected by the activity, for example those who use a service? Where did you get that data from (existing data gathered generally) or have you gone out and got it and what does it say about the protected characteristics and the other characteristics about which the council is interested?

Is there currently any evidence of discrimination or disadvantage to the groups?

What will the impact of the changes be?

You should try to identify any data and/or evidence about people who have a **combination, or intersection, of two or more characteristics**. For example, homeless women, older disabled people or young Black men.

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## 2.a Consider any relevant data and evidence in relation to all Equality Act protected characteristics:

- Age
- Disability, including family carers<sup>1</sup>
- Gender reassignment<sup>2</sup>
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

### Age

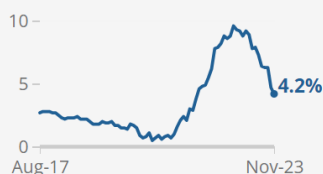
#### *Tenants over state pension age*

Tenant's ages are collected when tenancies begin and the Council is able to extract accurate data on the tenant age profile from our integrated housing IT system, NEC (Northgate). The number and profile of tenancies varies slightly from week to week as tenancies end and new ones begin. 6602 council tenants (30% of all tenants) were aged 66 years old or older on 20 December. 66 is the state pension age.

In his Autumn Statement to Parliament on 22 November 2023 the Chancellor of the Exchequer announced that state pensions would increase by 8.5% in April 2024. This amounts to a weekly increase of £17.45 for people receiving the full pension. Whilst this is greater than the proposed average rent increases for all bedroom sizes, consumer price inflation in the year to November 2023 was at 4.2%. Although the inflation rate has reduced this still means that the cost of goods and services is increasing.

#### Inflation falls to 4.2% in November 2023

Consumer Prices Index including owner occupiers' housing costs (CPIH) annual inflation rates, UK



Source: Office for National Statistics

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<sup>1</sup> This is the legal term in the Equality Act. In practice there are specific legal protections for a diverse range of people who have physical, mental and sensory impairments, long-term health conditions and/or neurodivergence, as well as carers who provide unpaid care for a friend or family member who cannot function without their support. Census and local datasets use the Equality Act definition and will include people who may not use the language of disability to describe themselves.

<sup>2</sup> This is the legal term in the Equality Act. In practice there are specific legal protections for anyone whose gender identity does not match the sex they were assigned at birth. This means, for example, that people who are trans and people who are non-binary or gender fluid are considered a specific protected group under the Equality Act.

<sup>3</sup> [Cost of living latest insights - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/cost-of-living/latest-insights) accessed 6 December 2023

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Universal Credit stops when people reach state pension age and tenants over that age need to apply for housing benefit for help with their housing costs. Approximately 75% of tenants aged 66 and over receive housing benefit for their rent and service charges and on 28 November 2023 4220 council tenants over state pension age were receiving housing benefit. As seen above, tenants will not be impacted by the rent and service charge increase if their housing costs are covered by housing benefit. The 25% of tenants in this age group who don't receive housing benefit (usually because they have additional work pensions, savings exceeding £16,000 or are still working) will be impacted although the impact is mitigated by the increase in state pension.

The bedroom tax no longer applies when tenants reach state pension age however a percentage rent increase means that tenants in larger homes will have a larger rent increase and older tenants who have remained in larger homes after children have grown up and moved out may have more to pay as a result than other single tenants or couples in smaller homes. The Council provides support, including incentive payments, to tenants who wish to downsize<sup>4</sup> including a specialist team that provides support to tenants aged 60 and over.<sup>5</sup> Tenants who have extra space also have other options to mitigate the impact of a rent increase. Secure tenants for example have the right to take in a lodger if they choose and may sub-let a room provided they haven't moved out and provided they have their neighbourhood housing officer's permission.

The Council values our older residents, many of whom have been our tenants for many years and we recognise that older tenants can sometimes need extra support to stay living in their homes. Every year we work with Public Health on our annual Winter Wellness campaign identifying older tenants living in the areas with the highest levels of deprivation and at highest risk of loneliness (using the Age UK Loneliness map). Contact is made with those tenants over the winter months to offer advice and support including with benefit and money issues if it is needed.

## ***Older tenants who are younger than the state pension age***

The Council can no longer be sure how many tenants are affected by the bedroom tax because Universal Credit is administered by the Department for Work and Pensions (DWP) who do not share this data with Local Authorities. 514 council tenants receiving Housing Benefit were affected by the bedroom tax on 28 November and, based on this, it is estimated that at least 800 tenants have a shortfall in their benefit for housing costs for this reason. Tenants who have more bedrooms than they need under the Government's definition tend to be older with adult children who have moved out. The maximum additional impact for this group would equate to 25% of the rent increase for their flat (or £3.47 per week for the largest flats).

Tenants who have other adults who are not their spouse or partner (usually adult children) living with them may have a "non-dependent deduction" (NDD) from any benefit they receive for their housing costs. Whilst a contribution towards the rent from another earner in the household may benefit many, other tenants with an NDD do not receive their

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<sup>4</sup> [Financial help for downsizing your council home - Camden Council](#)

<sup>5</sup> [Downsizing - Camden Council](#)

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contribution. A rent increase would not mean however that the amount of the non-dependent deduction would increase as it is a set amount (currently, for example, a monthly reduction of £85.73 from Universal Credit paid for housing costs). Non-dependant deductions are likely to be higher if there is more than one non-dependant.

## **Young tenants**

On 20 December 2023, 265 tenants (just over 1%) were aged 25 or younger. This includes Camden care leavers. 54 care leavers were rehoused into Camden tenancies in 2022-23. As 42 tenancies were let to care leavers the previous year, a significant proportion of younger tenants will be care leavers. Younger people are often on lower wages. The National Minimum Wage for people under the age of 25 varies with people entitled to less the younger they are. Young people are also more likely to be studying, starting out on their career or in insecure work.

The National Minimum wage is due to increase in April for over 21 year olds by £1.02 per hour (9.8%) to £11.44.

## **Disability, including family carers**

Data from the March 2021 census on disability published in January 2023 showed more than one in seven (15.2%) Camden residents with a long-term health problem or disability limiting day-to-day-activities in some way. The most recent Family Resources Survey, published by the Department of Work and Pensions in July 2023 identified 24% of people reporting a disability with only slightly fewer (23%) of “working age” people reporting a disability.

Prevalence and risk of disability rises sharply with age. The Family Resources Survey identified 45% of adults over state pension age reporting a disability. The average age of a council tenant is 54, significantly higher than the Camden population as a whole and levels of ill health and disability will be higher too especially given the needs-based housing allocations policy which gives additional priority to applicants on medical grounds (12% of lettings last year were to households where a family member had the highest possible medical points.)

MIND referred to Covid as a “mental health emergency”. They quoted ONS data showing rates of depression doubling during the pandemic and 84.9% people reporting being stressed or anxious. The pandemic was followed by the cost of living crisis and the impact of both is long lasting. MIND have also reported that 1 in 3 social housing tenants suffer from mental health problems. Rates of mental ill health in Camden are significantly higher than the national average. A report of the Cabinet Member for Health, Wellbeing and Adult Social Care for a themed debate on mental health and wellbeing at Council on 18 September 2023 referred to 2017 data showing 1 in 5 Camden residents suffering from depression or anxiety. It also refers to data showing self-reported loneliness in Camden substantially higher than in any other Inner London borough.

Residents with long term ill health issues or disabilities may have more expenses than other people, for instance if they are housebound their fuel costs are likely to be higher.

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Residents with unavoidable higher expenses who don't have their housing costs covered by benefit may be adversely affected by a rent increase. Anxiety about money is one of the key factors that can exacerbate mental ill health conditions like depression, especially when people are also worried that they might lose their home. A December 2022 analysis of tenants in Camden with the highest rent arrears found at least 42% had reported experiencing problems with their mental health. As this can be a difficult issue for people to disclose, the actual rate will be much higher.

At the same time, as well as funding repairs and improvements to council homes, the rents that council tenants pay fund services that support the most vulnerable to keep safe, keep their tenancies and maximise their income – like our neighbourhood housing and welfare rights teams and community safety officers.

## **Gender reassignment**

NEC data shows 25 council tenants have identified as trans. It was difficult to identify any UK research into the financial resilience of trans people. Individual tenancy records have not been checked to inform this EqIA.

## **Marriage and civil partnership**

There is usually no need for couples to share their relationship status with the Council and the Council does not have data about tenants who have married their partner or who are in a civil partnership. It can also be difficult to keep track of household composition as tenants do not need to tell the Council if someone leaves or joins their household unless (for example) they are receiving a benefit or discount, or have made an application, where this matters.

As the chart above shows, over 40% of council homes have one bedroom or are studios. This reflects that a significant proportion of council tenants live on their own. Although there are some benefits that reduce costs for single people, like the 25% single person discount for council tax, people living on their own don't have someone else to share the rent and bills with.

Data published by the Office for National Statistics (ONS) in 2019,<sup>6</sup> which followed analysis of how 25-64 year olds spent their money, showed “people living on their own spend an average of 92% of their disposable income, compared with two-adult households who spend only 83% of theirs” and that single people “feel less financially secure than couples without children”. More recently ONS analysis of 2021 census data published in May 2023<sup>7</sup> found 13% of all households in the UK consisted of people living on their own. The proportion in the Council's stock is significantly higher.

<sup>6</sup> [The cost of living alone - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

<sup>7</sup> [Families and households in the UK - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

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## **Pregnancy and maternity**

62% of council tenants are women. This partly reflects a significant number of single parent households largely headed by women. As referred to above, tenants do not have to share their relationship status or household composition with their landlord so it is not possible to be completely certain about how many single parent households there are at any particular time. Census data from March 2021 shows a total of 10,559 single parent households in the borough (a significant increase from the 2011 census) of whom around 90% will be headed by women. Taking into account that the costs of raising children are disproportionately borne by women, any additional pressures on incomes are also likely to disproportionately affect them.

Women are also far more likely to have unpaid caring responsibilities impacting on their ability to take on full time paid employment. When the costs of child care or social care are prohibitively expensive they can be a barrier to paid employment or full-time work.

## **Race**

The Council's report "Building Equal Foundations," published in the summer of 2020, details the disproportionate impact that Covid-19 had on Black and Asian people and people from other minority ethnic backgrounds, noting that "Black, Asian and minority ethnic workers are more economically vulnerable to the current crisis than white ethnic groups as they are more likely to work in the shut-down sectors such as restaurants, retail and the gig economy". Analysis of council tenants claiming Universal Credit since 23 March 2020, carried out to help identify the impact of Covid, identified that Black and Asian tenants featured disproportionately in this group. As referred to above higher rents and charges are likely to impact disproportionately on those who are already economically disadvantaged.

Data about ethnicity is only available for 65% of council tenants either because tenancies predate the date that this data began to be collected, because tenants did not wish to share this information or because the data was not collected for another reason. Excluding tenants described as "white" (UK, Other, Irish or gypsy / traveller) 8652 tenants (54% of those for whom there are records) are recorded as Black, Asian, mixed race or other with the largest categories being Bangladeshi (2119), Black African (1735), Other (1432) and Somali (891).

## **Religion or belief**

There is limited data about the religion or beliefs of Camden council tenants. Of the data that does exist the three largest categories were for people who identified as Muslim, Christian or as having no religion or belief.



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## **Sex**

As referred to above, 62% of council tenants are women. In the data appendix to their Cost of Living Crisis Enquiry Report published in March 2023<sup>8</sup> Camden Women's Forum have highlighted that median pay for women who live in Camden was 86% of men's pay in 2021 and therefore 14% lower on average than that of a man.

See also the section above about pregnancy and maternity. Single parents are overwhelmingly women.

ONS data referred to above found that living alone comes with extra financial challenges. ONS census data also shows that 53% of people living alone nationally are women. Many of these people will be older people, especially older women. Analysis of 5314 sole tenancies held by tenants aged 65 or older (excluding sheltered housing tenants) was carried out in October 2023 for the annual Winter Wellness Campaign. This found that 64% (3407) were women and 36% (1907) were men.

## **Sexual orientation**

There is limited data on the sexual orientation of Camden tenants. Of those for whom data is known the largest group identify as heterosexual, followed by those who do not wish to disclose this information. Although the data is limited it does indicate a significant minority of tenants identifying as lesbian, gay, bi-sexual or other sexuality.

## **Intersectional groups**

Council housing is concentrated in many of the most deprived areas of Camden. The proportion of council tenants seeking work is almost twice that of private sector tenants and three times that of owner occupiers, the proportion looking after home or family is more than double that of residents in other sectors and the proportion with a long-term sickness or disability more than five times higher than in other sectors. Lower income households are concentrated in social housing with around 70% of council tenants receiving full or partial housing benefit or Universal Credit and Black and Asian tenants and women are disproportionately represented amongst those lower income groups.

Council rents tend to be lower than Housing Association rents and are significantly lower than the rents that tenants in the private rented sector pay in Camden. That the Council's rents are less than rents in other tenures does not however lessen the impact of increases in rents and charges for those on low incomes who need to pay them.

At the same time a significant proportion (around 70%) of tenants on the lowest incomes are not expected to have more to pay because of these proposals and many of the services that council rents pay for help to support the most disadvantaged and reduce inequality.

<sup>8</sup> [Camden Women's Forum - Camden Council](#)

# Camden Council Equality Impact Assessment Form

## 2.b Consider evidence in relation to the additional characteristics that the Council is concerned about:

- Foster carers
- Looked after children/care leavers
- Low-income households
- Refugees and asylum seekers
- Parents (of any gender, with children aged under 18)
- People who are homeless
- Private rental tenants in deprived areas
- Single parent households
- Social housing tenants
- Any other, please specify

### **Fosters carers**

The Council's Allocations Scheme provides for a quota of ten larger homes for letting to council approved foster carers each year and the Council promotes foster care as an option to our tenants. There is no data easily available to identify how many foster carers live in the Council's stock.

### **Looked after children/care leavers**

The Allocations Scheme also provides for additional support needs points for young people aged under 25 who have lived in care. Data provided above (see section on "age") explains that 54 care leavers were rehoused into the Council's stock last year and that a significant proportion of our younger tenants are likely to have spent time in care.

### **Low-income households**

The Council's rent accounting data shows 6778 tenants receiving Universal Credit (UC) at the end of November 2023 when 9907 tenants were receiving housing benefit. Adding these figures together indicates that just over 72% of tenants are receiving benefits for housing costs (in full or in part). The proportion of tenants on these benefits has been increasing as increasing number of tenants either claim or transition to UC and it is likely that the Council's data inflates the number of tenants on UC. This is because, whilst the DWP advise the Council when tenants claim UC, it does not advise us when they stop and therefore a number of tenants recorded as UC claimants will have stopped claiming.



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As explained above, tenants receiving benefits towards their housing costs will not have more to pay because of the proposed increase in rents and service charges unless they are impacted by the bedroom tax or benefit cap.

Around 28%-30% of council tenants receive no help from benefits to cover, or contribute to, their housing costs. Increased rents and charges will impact adversely on tenants with incomes above the qualifying level for assistance with their housing costs from housing benefit or Universal credit. This largely affects tenants below state pension age but will also affect some older tenants who receive a private pension. There will also be an impact for tenants with capped benefits due to the benefit cap or social sector size criteria (bedroom tax). These tenants will have an increased benefit shortfall and their rent increase will reduce the income they have available for other things. The bedroom tax reduces benefit for housing costs by 14% for people with one extra bedroom and by 25% for those with two or more.

## **Refugees and asylum seekers**

The Council does not have reliable data about the number of tenants who have, or who had, refugee or asylum seeker status. Many of these tenants were granted tenancies many years ago.

## **Parents (of any gender, with children aged under 18)**

Around 58% of the Council's stock has two bedrooms or more and whilst some homes are under occupied (for example where adult children have left home) other smaller homes are occupied by overcrowded families. A significant proportion of council homes are occupied by families with children. This has been referred to in the sections above

## **People who are homeless**

Whilst council tenants are, by definition, not homeless, 13% of lettings in 2022-23 were to applicants who were homeless or to prevent homelessness. Another 45% of lettings were to households / individuals who lived with family or friends.

The Council is committed to helping tenants to maintain successful tenancies and avoid homelessness and much of the work of our neighbourhood housing teams, rent teams and welfare rights team contributes to this. These services are funded by tenant's rents.

## **Private rental tenants in deprived areas**

This section is not applicable.

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## Single parent households

Some of the additional financial challenges faced by single parents are referred to in the section on maternity and pregnancy above. As a result of these, the unaffordability of private sector rents for many single parents and the Council's allocation policy (which aims to prioritise for housing those in the greatest need) it is likely that many of the borough's ten and a half thousand single parents are living in social housing and, as the Council is the largest landlord in the borough, in council housing in particular.

## Social housing tenants

The entirety of this report is focused on social housing tenants and therefore this section is not applicable.

## Any other, please specify

Other groups impacted by these proposals include residents in Camden hostels where it is intended to increase supported housing charges. Most hostel residents will have the increase in charges covered by benefits.

## 2. c Have you found any data or evidence about intersectionality. This could be statistically significant data on disproportionality or evidence of disadvantage or discrimination for people who have a combination, or intersection, of two or more characteristics.

Yes, this is referred to in the section above on intersectional groups. This assessment refers, throughout, to how many council tenants have a combination of characteristics that when taken together multiply any disadvantage they are experiencing or risk.

The Council's rent setting process is informed by the need to strike a balance between the need for revenue from rents and service charges, which is vital to repair and improve homes and provide services for tenants, and the need to set rents and charges at a level that recognises the risk of hardship when tenants are asked to pay more.

## Step 3: Impact

Given the evidence listed in step 2, consider and describe what potential **positive and negative impacts** this work could have on people, related to their **protected characteristics** and the **other characteristics** about which the Council is interested.

Make sure you think about all three aims of the public sector equality duty. Have you identified any actual or potential discrimination against one or more groups? How could you have a positive impact on advancing equality of opportunity for a particular group? Are there opportunities within the activity to promote "good relations" – a better understanding or relationship between people who share a protected characteristic and others?

## 3.a Potential negative impact on protected characteristics

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| Protected Characteristic    | Is there potential negative impact? (Yes or No) | Explain the potential negative impact   |
|-----------------------------|---|---|
| Age                         | Yes for some                                    | <p>Some, largely older, tenants under state pension age who have a shortfall in their benefit because of the bedroom tax or benefit cap will pay more as will people who do not receive help from benefits to pay their rent or charges. There may also be an impact for people on lower wages or in insecure work. These are often younger people.</p> <p>Older tenants are more likely to be retired and suffer from health issues or have a disability meaning that they may spend more time at home than other groups. They may not use heating and hot water as much as they should to keep warm and well because they are worried about the cost.</p> |
| Disability including carers | Yes for some                                    | <p>Disabled tenants are one of the groups who may have higher living expenses and any additional demands on their budgets may Impact them more than others.</p> <p>Anxiety levels have risen since the pandemic and a rent increase may be one more thing for tenants to worry about, including the many who experience mental ill health.</p> <p>The most disabled and unwell are likely to be receiving benefit that covers their housing costs. This does not necessarily cover heating and hot water charges which are often higher for disabled people.</p>  |
| Gender reassignment         | No  | None identified   |
| Marriage/civil partnership  | Yes for some                                    | No negative impact identified other than that any additional financial burden can adversely affect those whose budgets are more stretched. This can be the position for single person households and especially single parents.   |
| Pregnancy/ maternity        | Yes for some                                    | As above  |

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|                    |              |   |
|--------------------|--------------|---|
| Race               | Yes for some | Black and Asian people often experience economic and health inequalities. A rent increase disproportionately impacts people in insecure or low paid work and these are often Black and Asian people and people from other ethnic minority group       |
| Religion or belief | No           | None identified   |
| Sex                | Yes for some | No negative impact identified other than that any additional financial burden can adversely affect those whose budgets are more stretched. Women's jobs and incomes still lag behind those of men. 62% of tenants are women, many are single parents. |
| Sexual orientation | No           | None identified   |

### 3.b Potential positive impact on protected characteristics

| Protected Characteristic    | Is there potential positive impact? (Yes or No) | Explain the potential positive impact  |
|-----------------------------|---|--|
| Age                         | Yes   | <p>The positive impact for all groups is in the contribution tenants' rents make to the provision of the Councils housing services including those that help to address inequality and promote financial Inclusion as well as repairs and improvements to council homes. Whilst these may benefit all tenants, they particularly benefit those with protected characteristics. Neighbourhood based housing teams with a named housing officer as a contact for tenants in a small local area may particularly benefit the older and more vulnerable.</p> <p>A majority of tenants (around 70%) will have the increase in rent and charges covered by the benefit they receive towards their housing costs.</p> |
| Disability including carers | Yes   | As above   |
| Gender reassignment         | Yes   | As above   |

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|                            |     |          |
|----------------------------|-----|----------|
| Marriage/civil partnership | Yes | As above |
| Pregnancy/ maternity       | Yes | As above |
| Race                       | Yes | As above |
| Religion or belief         | Yes | As above |
| Sex                        | Yes | As above |
| Sexual orientation         | Yes | As above |

### 3.c Potential negative impact on other characteristics

| Characteristic                                      | Is there potential negative impact? (Yes or No) | Explain the potential negative impact  |
|---|---|--|
| Foster carers                                       | No  | None identified  |
| Looked after children/care leavers                  | Yes for some care leavers                       | There may be an impact for people on lower wages or in insecure work. These are often younger people, including care leavers.  |
| Low-income households                               | Yes for some                                    | Around 30% of tenants receive no help with their housing costs from benefits. Some will have good incomes and / or savings but others will be on low incomes just above benefit level and already stretched budgets may be stretched more (although for some the proposed increases will mean they are eligible for benefits that they weren't eligible for before). |
| Refugees and asylum seekers                         | No  | None identified  |
| Parents, of any gender, with children aged under 18 | Yes   | As above (under low-income households)   |
| People who are homeless                             | No  | None identified. Rents for TAPP properties used to house homeless applicants are not increasing.   |

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|   |                |   |
|---|----------------|---|
| Private rental tenants in a deprived area | No             | Not applicable  |
| Single parent households                  | Yes for some   | See above (under low income households)                                 |
| Social housing tenants                    | Not applicable | Please see other sections as this EqlA is wholly about council tenants. |
| Any other, please specify                 | No             | None identified   |

### 3.d Potential positive impact on other characteristics

| Characteristic                     | Is there potential positive impact? (Yes or No) | Explain the potential positive impact   |
|------------------------------------|---|---|
| Foster carers                      | Yes   | <p>The positive impact for all groups is in the contribution tenants' rents make to the provision of the Councils housing services including those that help to address inequality and promote financial inclusion as well as repairs and improvements to council homes. Whilst these may benefit all tenants, they particularly benefit those with protected characteristics. Neighbourhood based housing teams with a named housing officer as a contact for tenants in a small local area may particularly benefit older or more vulnerable tenants.</p> <p>A majority of tenants (around 72%) will have the increase in rent and charges covered by the benefit they receive towards their housing costs.</p> |
| Looked after children/care leavers | Yes   | As above  |
| Low-income households              | Yes   | As above  |
| Refugees and asylum seekers        | Yes   | As above  |

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|   |                |   |
|---|----------------|---|
| Parents, of any gender, with children aged under 18 | Yes            | As above  |
| People who are homeless                             | Not applicable | Not applicable  |
| Private rental tenants in deprived areas            | Not applicable | Not applicable  |
| Single parent households                            | Yes            | See above (under foster carers)   |
| Social housing tenants                              | Not applicable | Please see other sections as this EqlA is wholly about council tenants. |
| Any other, please specify                           | Not applicable | Not applicable  |

**3.e Consider intersectionality.**<sup>4</sup> Given the evidence listed in step 2, consider and describe any potential **positive and negative impacts** this activity could have on people who have a **combination, or intersection, of two or more characteristics**. For example, people who are young, trans and homeless, disabled people on low incomes, or Asian women.

Potentially, negative impacts for those affected (a bigger drain on already stretched finances) could be greater for those who have a combination, or intersection, of more than one of the characteristics listed above. At the same time, because the purpose of council housing and services is to help reduce inequality, including by providing good quality affordable housing for people who have few alternative options, these residents may benefit more from the investments into homes and services these increases will pay for.

<sup>4</sup> Intersectionality refers to the interconnected nature of social categorisations such as race, class, and gender as they apply to a given individual or group, regarded as creating overlapping and interdependent systems of discrimination or disadvantage.

## Step 4: Engagement - co-production, involvement or consultation with those affected

**4.a How have the opinions of people potentially affected by the activity, or those of organisations representing them, informed your work?**

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|   |   |
|---|---|
| <p>List the groups you intend to engage and reference any previous relevant activities, including relevant formal consultation?<sup>9</sup></p> | <p>If engagement has taken place, what issues were raised in relation to one or more of the protected characteristics or the other characteristics about which the Council takes an interest, including multiple or intersecting impacts for people who have two or more of the relevant characteristics?</p>   |
| <p>Council tenants</p>  | <p>Consultation will be with the five District Management Committees (DMCs) consisting of representatives from Camden’s tenant and resident associations (TRAs). Informal consultation took place at December DMCs followed by a formal consultation process at a joint DMC meeting on 10 January 2024. A summary of DMC feedback will be presented to Cabinet when the proposal is considered.</p> <p>Resident engagement to identify tenant priorities is an ongoing process of dialogue. This includes through our current intensive engagement programme and through tenant satisfaction surveys.</p> |

**4.b. Where relevant, record any engagement you have had with other teams or directorates within the Council and/or with external partners or suppliers that you are working with to deliver this activity. This is essential where the mitigations for any potential negative impacts rely on the delivery of work by other teams.**

Not applicable

## Step 5: Informed decision-making

**5. Having assessed the potential positive and/or negative impact of the activity, what do you propose to do next?**

Please select one of the options below and provide a rationale (for most EqIAs this will be box 1). Remember to review this and consider any additional evidence from the operation of the activity.

This section will be completed following consultation with DMCs. In advance of that consultation the expectation is that option 3 will apply.

<sup>9</sup> This could include our staff networks, advisory groups and local community groups, advice agencies and charities.



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|   |                                   |
|---|-----------------------------------|
| <p><b>1. Change the activity to mitigate potential negative impacts identified and/or to include additional positive impacts that can address disproportionality or otherwise promote equality or good relations.</b></p> | <p>See explanatory note above</p> |
| <p><b>2. Continue the work as it is because no potential negative impacts have been found</b></p>   | <p>Not applicable</p>             |
| <p><b>3. Justify and continue the work despite negative impacts (please provide justification – this must be a proportionate means of achieving a legitimate aim)</b></p>   | <p>See explanatory note above</p> |
| <p><b>4. Stop the work because discrimination is unjustifiable and there is no obvious way to mitigate the negative impact</b></p>  | <p>Not applicable</p>             |

## Step 6: Action planning

**6. You must address any negative impacts identified in steps 3 and/or 4. Please demonstrate how you will do this or record any actions already taken to do this.**

Please remember to add any positive actions you can take that further any potential or actual positive impacts identified in step 3 and 4.

Make sure you consult with or inform others who will need to deliver actions.

| Action  |
|---|
| <p>The Council continues to resource interventions that help to mitigate the impact of money pressures on our tenants. Council policies also ensure that rent arrears recovery has a focus on tenancy sustainability and staff provide practical advice and help to tenants with benefits, budgeting and debt including through a specialist welfare rights team that works with council tenants and hostel residents and our new Home Energy Advice Team. Support is also provided through the council tax support scheme, discretionary housing payments fund and from the Council's Cost of Living Crisis Fund for people who are experiencing severe hardship. The Council also funds Camden Advice Network partners to provide advice and support to Camden residents across tenure. Partners include Camden Citizens Advice and Age UK.</p> |

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The annual rent and service charge notification letter advises tenants how to apply for housing benefit and other support and the Council is in contact with tenants regularly to reassure those worried about paying their rent and to offer support. Two specialist teams set up in September 2022 enable twenty neighbourhood housing officers to focus on establishing contact with tenants behind with their rent. The Council's floating support service is available to assist hostel residents and tenants of tenant managed organisations. Contact Camden have a welfare support telephone service linking Camden residents to sources of help.

The Council's response to the Cost of Living Crisis is set out in the November 2022 Cabinet report from the Cabinet Member for Finance and the Cost of Living [Cost of Living report.pdf \(camden.gov.uk\)](#) and there is comprehensive advice about sources of help and support on the Council's website: [Cost of living support - Camden Council](#). Winter Housing News, delivered to council homes in December, includes a supplement on help with the cost of living.

## Step 7: EqIA Advisor

Ask a colleague, preferably in another team or directorate, to 'sense check' your approach to the EqIA and ask them to review the EqIA form before completing it.

They should be able to clearly understand from what you have recorded here the process you have undertaken to assess the equality impacts, what your analysis tells you about positive and negative actual or potential impact, and what decisions you have made and actions you have identified as a result.

They may make suggestions for evidence or impacts that you have not identified. If this happens, you should consider revising the EqIA form before completing this version and setting a date for its review.

If you feel you could benefit from further advice, please contact the Equalities service at [equalities@camden.gov.uk](mailto:equalities@camden.gov.uk)

## Step 8: Sign-off

|                                   |  |
|-----------------------------------|--|
| <b>EqIA author</b>                | Name: Jo Adams<br>Job title Landlord Services Manager<br>Date 6 <sup>th</sup> December 2023              |
| <b>EqIA advisor / reviewer</b>    | Name Emma Cardoso<br>Job title Team Leader (HRA & Capital Projects)<br>Date 3 <sup>rd</sup> January 2024 |
| <b>Senior accountable officer</b> | Name Glendine Shepherd<br>Job title Director of Housing<br>Date 10 <sup>th</sup> January 2024            |