

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 regard¹ 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 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.

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Title of the activity	
EQIA on TA rent increase	
Officer accountable for the EqlA (e.g. director or project sponsor)	
Full name:	Glendine Shepherd
Position:	Director of Housing
Directorate:	23rd June 2025.
Email:	
Lead person completing the EqlA (author)	
Full name:	Malik Awodoyin
Position:	Housing Performance and Assurance Lead
Directorate:	Supporting Communities
Email:	Malik.awodoyin@camden.gov.uk
Person reviewing the EqlA (reviewer)	
Full name:	Liya Habte
Position:	Senior Policy and Projects Officer
Directorate:	23rd June 2025
Email:	
Version number and date of update	

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:

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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 aim of this activity is to standardise temporary accommodation (TA) rents across all relevant properties to 90% of the 2011 Local Housing Allowance (LHA) rate. This change is intended to ensure alignment with Housing Benefit (HB) eligibility rules, optimise rent recovery, and reduce the financial pressure on the Council's Housing Revenue Account (HRA) in light of the growing temporary accommodation overspend. The scope includes TA properties held within the Council's HRA, particularly those acquired through the Temporary Accommodation Purchase Programme (TAPP), and aims to address inconsistencies in current rent levels, improve fairness and transparency, and support residents through targeted financial assistance and safeguards.

RECOMMENDATIONS:

Cabinet is recommended to:

- c) Agree to changes to temporary accommodation rents so they are standardised at 90% of the 2011 LHA rate as set out in paragraphs 2.21-2.28, taking into account the Equality Impact Assessment in Appendix C*

The Leader of the Council is recommended to:

- a) Delegate authority to the Cabinet Member for Better Homes, following consultation with the Cabinet Member for Finance and the Cost of Living, to agree future changes to temporary accommodation rents as set out in paragraph 2.28*

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Continue on next page if more space is needed.

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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.

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

- ☒ Age
- ☒ Disability, including family carers²
- ☐ Gender reassignment³
- ☐ Marriage and civil partnership
- ☒ Pregnancy and maternity
- ☐ Race
- ☐ Religion or belief
- ☐ Sex
- ☐ Sexual orientation

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Age

The data is drawn from the Council's internal records on households currently placed in temporary accommodation (TA), including demographic information, and Housing Benefit (HB) status.

The age group 34 to 44 represents the largest proportion of main applicants in TA. Within this group, approximately 47% are currently in receipt of Housing Benefit. However younger households, particularly those under 24, tend to have lower income levels and reduced eligibility for certain benefits, potentially placing them at greater affordability risk as a result of rent

There is currently no direct evidence of age-based discrimination related to TA rent levels. However, affordability concerns for younger adults (under 24) may arise, particularly if they are not eligible for full HB support or have limited financial independence. The changes could indirectly affect this group more acutely if safeguards and support mechanisms (e.g. Discretionary Housing Payments or Money Advice Service) are not fully accessed or understood. For the majority of residents in the 34–44 age group who already receive HB, the change is not expected to impact household finances. The impact will be felt more by households not in receipt of HB, which includes a portion of younger residents. To mitigate this, officers will proactively identify and

support affected households, guiding them through HB or DHP applications or connecting them to financial advice services. A new pot will also be created specifically to mitigate the impact of the rent rises on these groups.

2 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.

3 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.

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Disability, including family carers

The percentage of disabled resident in temporary accommodation sample is 1% and 27% are claiming Housing benefit. There is no current evidence of direct discrimination or systemic disadvantage against disabled residents in the context of temporary accommodation rents. However, given the relatively low proportion of self-reported disabilities, there may be underreporting or gaps in data quality. Given the very small number (1%)

Gender reassignment

Not applicable

Marriage and civil partnership

Not Applicable

Pregnancy and maternity

No up to date data to show the impact of this project on the cohort.

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Race

Not Applicable

Religion or belief

Not applicable

Sex

Not Applicable

Sexual orientation

Not Applicable

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Intersectional Groups

There is no direct evidence at present of intersectional discrimination in the rent-setting process. However, intersectional groups — such as young disabled residents not in receipt of Housing Benefit, or Disable single parents with limited income — may be at higher risk of affordability challenges if not adequately supported. The Council has put in place multiple safeguards to protect households who may be affected by the change. These include: Discretionary Housing Payments (DHP) for those not fully covered by HB, Access to the Money Advice Service for financial support and benefits guidance, and Ongoing monitoring to assess impacts and adjust support where necessary. In addition, officers will continue to explore ways to improve equality monitoring data to enable better understanding of intersectional needs going forward.

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

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Foster carers

Not Applicable

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Looked after children/care leavers

Children 0 - 25 carry out their assessment through children services, while above 25 will have to go through the temporary accommodation pathway..

Also, Camden being a care conscious council has made sure care experience is part of protected characteristics.

Low-income households

Low-income households in temporary accommodation are among those most likely to be impacted by the proposed rent standardisation. A proportion of low-income households may not be eligible for full Housing Benefit or may have unpredictable income (e.g. from zero-hour contracts or part-time work). For these households, the increase in rent even if aligned with the maximum eligible Housing Benefit could lead to affordability pressures, if their benefit entitlement does not fully cover the new rent amount.

To mitigate the risk: Households will be supported to review and update their benefit claims, with the goal of maximising their entitlement. Those ineligible for full support will be able to apply for Discretionary Housing Payments (DHP). Further support will be available through the Money Advice Service, which can provide guidance on budgeting, debt advice, and wider welfare support. As a backstop a pot will be carved out to ensure families are not unduly impacted by the changes.

Refugees and asylum seekers

No Applicable

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

Not applicable

People who are homeless

The cohort directly affected by this activity consists of individuals and families already experiencing homelessness and currently placed in temporary accommodation (TA) by the Council. These households often face multiple and compounding vulnerabilities, including financial insecurity, health challenges, and social marginalisation.

Private rental tenants in deprived areas

Not Applicable

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Single parent households

Not Applicable

Social housing tenants

Not Applicable

Any other, please specify

Not Applicable

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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.

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Not Applicable

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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

Protected Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact

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Age	Yes	<p>Younger households may be less likely to be in receipt of full Housing Benefit due to employment patterns (e.g. zero-hour contracts), unstable incomes, or limited awareness of entitlement. As a result, they may be more exposed to the rent increase without the same access to financial safeguards.</p> <p>Risk Mitigation: Camden is firmly committed to providing support for households facing financial challenges through a comprehensive suite of services designed to enhance financial literacy and overall well-being. Below are some key initiatives designed to assist our residents who are going through financial difficulties:</p> <p>Discretionary Housing Payments (DHPs): These essential payments provide temporary financial support to help residents meet their rent or housing costs. Each application is carefully assessed to ensure that assistance is tailored to the individual's specific needs.</p> <p>Cost of Living Crisis Fund:</p> <p>Cost of Living Awards: This program is designed to assist residents facing substantial economic hardship by facilitating access to essential necessities, including food, warmth, water, electricity, and housing. Eligible residents may receive up to two awards within a 12-month period, with priority given to first-time applicants.</p> <p>Household Support Fund (HSF) Awards: This additional funding option provides grants to residents who meet specific criteria, including those receiving benefits but not eligible for DWP Cost of Living grants,</p>
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		<p>as well as individuals with disabilities, pensioners, and carers experiencing financial difficulties.</p> <p>Family Crisis Fund:</p> <p>Universal Free School Meals: This initiative ensures that no child experiences hunger by funding free school meals for primary school students, thereby promoting a foundation for education and health.</p> <p>Emergency Funding: Targeted financial resources are allocated to essential programs that directly address the cost-of-living crisis, providing immediate assistance to families and individuals in urgent need.</p> <p>Camden Money Advice Service: This service employs local residents to provide money advice and self-referral services. It is designed to equip individuals with the knowledge and tools necessary for effective financial management and to avoid debt, thereby promoting long-term financial sustainability.</p>
Disability including carers	Yes	<p>Residents with disabilities may face additional living costs, such as costs for mobility aids, medical treatments, or accessible transportation. An increase in rent if not fully covered by HB or mitigated through Discretionary Housing Payments (DHPs) could place additional financial pressure on these residents, potentially leading to hardship or reduced access to necessary care and services.</p>
Gender reassignment	No	
Marriage/civil partnership	No	

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Protected Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Pregnancy/ maternity	No	
Race	No	
Religion or belief	No	
Sex	No	
Sexual orientation	No	

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3.b Potential positive impact on protected characteristics

Protected Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Age	No	
Disability including carers	No	
Gender reassignment	No	
Marriage/civil partnership	No	

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Protected Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Pregnancy/ maternity	No	
Race	No	
Religion or belief	No	
Sex	No	

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Protected Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Sexual orientation	No	

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	

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Looked after children/care leavers	No	
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Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Low-income households	Yes	<p>While many low-income households are eligible for HB or can apply for Discretionary Housing Payments (DHPs), some may fall through the gaps in eligibility, particularly those with fluctuating or informal incomes, those transitioning between benefits, or those unaware of the support available. This change may disproportionately impact single low-income earners or families who are just above benefit thresholds, potentially pushing them into housing instability or increasing their reliance on other forms of council support.</p> <p>Risk Mitigation:</p> <p>Please see the age for mitigation plans.</p>
Refugees and asylum seekers	No	
Parents (of any gender, with children aged under 18)	No	

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Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
People who are homeless	Yes	<p>Standardising TA rents at 90% of the 2011 LHA rate may increase the financial burden on homeless households currently placed in temporary accommodation not fully covered by Housing Benefit (HB). Mitigations</p> <p>Risk Mitigation: Please see age for mitigation plans.</p>
Private rental tenants in deprived areas	No	
Single parent households	No	

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Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Social housing tenants	No	
Any other, please specify	No	

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3.d Potential positive impact on other characteristics

Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Foster carers	No	
Looked after children/care leavers	No	
Low-income households	Yes	With clearer alignment to Housing Benefit eligibility, more low income households may be supported to claim the benefits they are entitled to, potentially reducing unexpected financial burdens. Additionally, the Council's commitment to offering targeted financial assistance such as Discretionary Housing Payments and Money Advice services can provide extra support to low-income households who may struggle with the increased rent, helping to prevent hardship and promote housing stability.

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Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Refugees and asylum seekers	No	
Parents (of any gender, with children aged under 18)	No	
People who are homeless	Yes	By improving rent recovery aligned with Housing Benefit rates, the Council can better manage the overspend on temporary accommodation. This financial stability helps sustain and potentially expand the availability of temporary accommodation for homeless households, reducing the risk of homelessness. Additionally, with targeted support such as assistance applying for Housing Benefit or Discretionary Housing Payments, homeless individuals and families can receive tailored help to maintain their housing, which contributes to reducing homelessness and promoting stable, secure living conditions. This approach also supports the Council's ability to invest in prevention and support services, positively impacting the broader homeless population by addressing root causes and improving access to suitable housing.

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Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Private rental tenants in deprived areas	No	
Single parent households	No	
Social housing tenants	No	
Any other, please specify	No	

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3.e Consider intersectionality.⁴ 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.

Not applicable

⁴ 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

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disadvantage.

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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?

List the groups you intend to engage and reference any previous relevant activities, including relevant formal consultation? ⁵	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?
Cabinet member for better homes and Finance and Cost of Living	Raised concern about the households who are not able to claim housing benefits.
Cabinet Debate	<p>A Cross Party debate will take place on 16th July, 2025, allowing all elected members to present concerns on behalf of their constituents to the Cabinet member for Better Homes.</p> <p>Responses will be provided within the designated time frame. If you have any questions, they will be addressed outside of the Cabinet Meetings.</p>
Resident Engagement	A letter will be sent to all residents currently living in temporary accommodation to inform them about the upcoming rent increase. Residents will also be invited to share their feedback, which will be carefully considered to help identify ways to mitigate any potential negative impacts of this change.

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5 This could include our staff networks, advisory groups and local community groups, advice agencies and charities.

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List the groups you intend to engage and reference any previous relevant activities, including relevant formal consultation? ⁵	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?
Scrutiny Consultation	<p>The Scrutiny Panels (TBC) represent a vital opportunity for community engagement, serving as public forums where the forward plan dates are readily available on the Camden website. These meetings, open to all residents, encourage active participation and observation. Interested residents, along with voluntary and community organisations, can share their concerns and insights during these sessions. The Panels are committed to transparently publishing their findings and recommendations, ensuring that the community's input is acknowledged and accessible to everyone.</p>

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List the groups you intend to engage and reference any previous relevant activities, including relevant formal consultation? ⁵	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?

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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.

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None

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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 EqlAs this will be box 1). Remember to review this and consider any additional evidence from the operation of the activity.

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.	
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2. Continue the work as it is because no potential negative impacts have been found

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3. Justify and continue the work despite negative impacts (please provide justification – this must be a proportionate means of achieving a legitimate aim)	<p>While the standardisation of temporary accommodation rents to 90% of the 2011 LHA rate may have some negative financial impact on certain groups particularly low-income households and individuals not currently receiving full Housing Benefit the overall benefits to the Council and residents justify continuing with the activity. This change is a proportionate means to achieve the legitimate aim of addressing the significant financial pressures and overspend in the Council's Housing Revenue Account caused by temporary accommodation costs. By aligning rents with Housing Benefit eligibility rules, the Council can optimise rent recovery and improve financial sustainability, ensuring continued provision and expansion of temporary accommodation for homeless and vulnerable residents. Importantly, there are safeguards and support mechanisms in place to mitigate negative impacts, such as assistance with Housing Benefit claims, Discretionary Housing Payments, and Money Advice services, helping to protect those most affected. This approach balances the need for financial responsibility and fairness with a commitment to support vulnerable residents, making it a justified and necessary step in tackling the housing crisis effectively.</p>
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4. Stop the work because discrimination is unjustifiable and there is no obvious way to mitigate the negative impact

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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	Due	Owner
Resident Engagement: Inform them of the increase in rent and gain feedback from them.	July 30th, 2025	Abiodun Akande, Income Operations Manager
Scrutiny Consultation: To be included in Work plan for Housing Income and Leaseholders	July 15th, 2025	Sean Scott, Head of Leaseholder Services and Housing Income

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Action	Due	Owner

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Step 7: EqlA Advisor

Ask a colleague, preferably in another team or directorate, to 'sense check' your approach to the EqlA and ask them to review the EqlA 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 EqlA 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

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Step 8: Sign-off

EqlA author	Name Malik Awodoyin Job title Performance and Assurance Lead Date 23rd July, 2025
EqlA advisor / reviewer	Name Liya Habte Job title Senior Policy and Projects Officer 23rd June 2025 Date
Senior accountable officer	Name Glendine Shepherd Job title Director of Housing 23rd June 2025 Date