

Appendix 6

Equality Impact Assessment (EIA)

Document control

Title of activity:	Private Sector Landlord Licensing
Type of activity:	Strategy
Lead officer:	Louise Watkinson, Public Protection Manager
Approved by:	Dipti Patel Assistant Director of Neighbourhoods
Date completed:	14 September 2017
Version Number	V7
Scheduled date for review:	Autumn 2018 -following 6 months of implementing the scheme

Did you seek advice from the Corporate Policy & Diversity team?	Yes
Does the EIA contain any confidential or exempt information that would prevent you publishing it on the council's website?	No

1. Equality Impact Assessment Checklist

About the activity

1	Title of activity	Private Sector Landlord Licensing
2	Type of activity	Strategy
3	Scope of activity	<p>Under the provisions of Part 2 of the Housing Act 2004 the council is proposing to designate 12 wards within Havering as an Additional Licensing area. This will have the effect of requiring landlords of <u>all</u> houses in multiple occupation (HMO) in these areas to have a license whereas, currently, Havering operates the mandatory scheme that requires only HMOs which are 3 storeys and above to obtain a property licence,.</p> <p>The scheme has been subject to a full public consultation with landlords, residents, businesses and community groups across the borough and all other potentially affected stakeholders who were invited to comment on the proposals. All feedback has been fully considered and will be presented to members prior to making the final informed decision at cabinet.</p> <p>The designation is intended to last for five years and the council will be required to review the scheme from time to time within this period. Havering is proposing to review the scheme at the end of year one and at year four of its operation. If following a review, it is considered appropriate to do so, the designation may be revoked.</p> <p>The aims of Havering Council's Private Sector Landlord Licensing Project are:</p> <ul style="list-style-type: none"> • to exercise the council's powers under the provisions under Part 2, section 55-56 of Housing Act 2004 • to improve management practices and improve housing conditions within the private rented residential sector and to deter the activities of rogue or unprofessional landlords within the Borough.
4a	Is the activity new or changing?	The process of making Additional Licensing Designation is a new activity for Havering, but is an established legislative procedure and has been invoked by other Boroughs to ensure better management practices and control over it's private rented sector in the interests of those people occupying private rented HMO accommodation and the broader community.
4b	Is the activity likely to have an impact on individuals or groups?	<p>Yes, the process of making this designation will impact on the following individuals/ groups :</p> <ul style="list-style-type: none"> • Landlords who operate any HMOs within the designated zones

		<ul style="list-style-type: none"> • Tenants who occupy or are potential occupiers of privately rented HMOs within designated areas • Borough residents and businesses located within the vicinity of HMO accommodation. • Interest groups e.g. young men, ethnic groups or low income households which support the provision of HMO accommodation
5	<p>If you answered yes:</p>	<p>An initial Screening EIA has been completed (pre-consultation) and has been updated at the end of the consultation period.</p> <p>Section 149 of the Equality Act 2010 stipulates the public sector equality duty. A public authority must, in the exercise of its functions, have due regard to the need to:</p> <ul style="list-style-type: none"> • eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act. • advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. • Foster good relations between persons who share a relevant protected characteristic and persons who do not share it. <p>Section 2 of this EIA addresses the public sector equality duty insofar as Havering holds information about the levels of anti-social behaviour (ASB) and crime in or close to areas where there is a high existence of HMOs. This data has been developed over recent years because the borough has envisaged an increasing need for a licensing scheme beyond the statutory licensing of three storey HMOs. In support of this is the reality for Havering Council's public duty that circumstances surrounding the topic of HMOs are fast developing within the local community and there are associated and growing social tensions, being fuelled by the perceived lack of Council control over the suitability and impact of HMO developments happening on the ground and poor management of existing HMOs.</p> <p>The council has addressed these concerns in part by its implementation of Article 4 Directions under the Town & Country Planning Act 1990 in order to achieve a balanced control in relation to how and where HMOs are proposed to be formed in the future. This however does not address the growing concerns relating to existing poorly managed and poor quality HMOs, hence the proposal to consider a comprehensive HMO Additional licensing scheme to cover most areas across the Borough.</p> <p>Inherent within the statutory process of making an Additional Licensing designation is the requirement to publicise the proposals within the community and to take into account all representations received when deciding whether or not to confirm the designations</p> <p>The consultation has now been completed and representations taken into account. The statutory 3-month period prior to any Licensing</p>

		Designation coming into effect would provide an adequate timeframe for measures to be introduced to mitigate the impact on groups with relevant protected characteristics.
6	If you answered no:	N/A

Completed by:	Wendy Laybourn, Senior Private Sector Housing Strategy Officer, Environment Services/ Neighbourhoods Directorate
Date:	14 September 2017

2. Equality Impact Assessment

Understanding the different needs of individuals and groups who use or deliver this service

Context:
<p>Havering has an important and growing private rented sector (PRS) that provides affordable housing options for local people. The council realises that the majority of landlords operate professionally, however the council is concerned about increasing levels of anti-social behaviour (ASB) associated with those rented properties that fail to meet satisfactory levels of tenancy and property management.</p> <p>There is a growing body of evidence that poorly managed privately rented properties are having a negative effect on neighbourhoods – anti-social behaviour, nuisance neighbours and properties, and accumulations of refuse are just three issues which have been linked to the failure of private landlords to manage properties and tenancies in an effective way. High demand and affordability issues for those residing in the PRS has resulted in overcrowding, sub-letting and illegal conversions with associated elevated levels of ASB and wider neighbourhood nuisance problems.</p> <p>The London Borough of Havering wants to ensure that all private rented shared homes in the borough offer residents a choice of safe, quality and well managed accommodation. We recognise that in order to achieve this there is a need for a robust and coherent regulatory framework in which this market operates.</p> <p>Havering has identified that problems in the private rented sector of poor property and tenancy management and anti-social behaviour, particularly in relation to houses in multiple occupation (HMOs), are distributed across most parts of the borough. To tackle these issues it is proposed to introduce an Additional Licensing designation in 12 wards</p> <p>The evidence base to be used in relation to the selection of areas to be designated under an Additional Licensing scheme relates to levels of ASB and crime, or evidence of poor management and facility standards. .</p>

HMO Locations

Information has been provided from checks of the housing benefit system (where credit is paid to individuals in shared accommodation or HMOs known on the Public HMO Register), the public HMO register, Liberty Housing properties, addresses which are suspected of being HMOs based on Tenure Intelligence Model, and data from council tax records for properties of shared accommodation and bedsits. A total of 793 addresses have been considered as part of this data exercise. The distribution and type/category of HMO by ward within Havering is shown in table 1 below.

Table 1

Ward	Benefit s	Council Tax	HM1 – Bedsit HMO's	HM2- Section 257	HM3- Shared House HMO	Public Register (Licensed HMO's)	Liberty Housing	Total	Suspected *(updated TIMS data)	Grand Total
Brooklands	4	11	9	2	5	1		32	57	89
Cranham		1			1			2	6	8
Elm Park	1	3	1		2	7		14	23	37
Emerson Park		1			1		1	3	17	20
Gooshays	6	4					1	11	57	68
Hacton	1	1	3					5	13	18
Harold Wood	1	2			3	4	1	11	30	41
Havering Park	2	5	1		2	3	2	15	27	42
Heaton	5	8	2		2	1	4	22	63	85
Hylands			3		1			4	18	22
Mawneys	1	2	4		1			8	20	28
Pettits	1	3	1				1	6	21	27
Rainham & Wennington	3	2	1	1	3	1	3	14	46	60
Romford Town	4	12	20	4	4	10	1	55	80	135
South Hornchurch	6	7	2		1			16	34	50
Squirrels Heath		2	2		1	4		9	22	31
Saint Andrews		1	3				1	5	19	24
Upminster		1						1	7	8
Totals	35	66	52	7	27	31	15	233	560	793

- HMO Public Register – addresses confirmed and registered as HMOs.
- Benefits List – Properties in receipt of housing benefit identified as HMO/Shared Accommodation not on public register.
- Council Tax List – Properties recorded on council tax register as being HMO/Bedsit/Shared Accommodation
- HM1 HMO – Bedsits – these are known HMOs below the mandatory licence level.
- HM2 HMO – Section 257 – these are known HMOs below the mandatory licence level.
- HM3 HMO – Shared House – these are known HMOs below the mandatory licence level.
- Liberty Housing properties, which are HMOs
- Suspected, unconfirmed HMO – addresses which are predicted HMO's based on Tenure Intelligence Model .

It should be noted that some addresses appear on multiple lists. Addresses are not duplicated/double counted in the table above. Those on official lists (HM1, 2, 3, Liberty Housing and HMO Public Register) have been removed from the Benefits, Council Tax and Suspect, unconfirmed lists.

Just fewer than one-third of the properties identified are categorised as HM1, HM2, HM3 – below the mandatory licence level. Whilst these properties are spread throughout most wards, they are concentrated largely around Romford Town and Brooklands wards, the biggest contributor being HM1 (Bedsits).

Where licensable HMOs are more prevalent are Heaton , Gooshays, Brooklands and Romford Town.

The Harold Hill area (Heaton, Gooshays and Harold Wood wards) contains 39% of HMOs known either to the public register, Liberty Housing or in receipt of housing benefit payments, and the highest proportion of suspected HMOs currently being investigated by planning are also in Harold Hill.

Harold Hill, which is a key area of concern of residents and Councillors, is home to approximately 13,000 residential properties, with 429 sales being made in the previous 12-months (according to RightMove) and 46 rentals advertised, including house shares and room renting (according to RightMove). Whilst this may be an emerging issue, it should be stressed that the significant majority of properties in Harold Hill are unaffected.

Figure 1 below provides a breakdown of all police ASB calls made in Havering and how they are categorised in the 12 month rolling period to September 2016. Neighbour disputes, harassment and noise, invariably interlinked, and substance misuse related ASB feature highly.

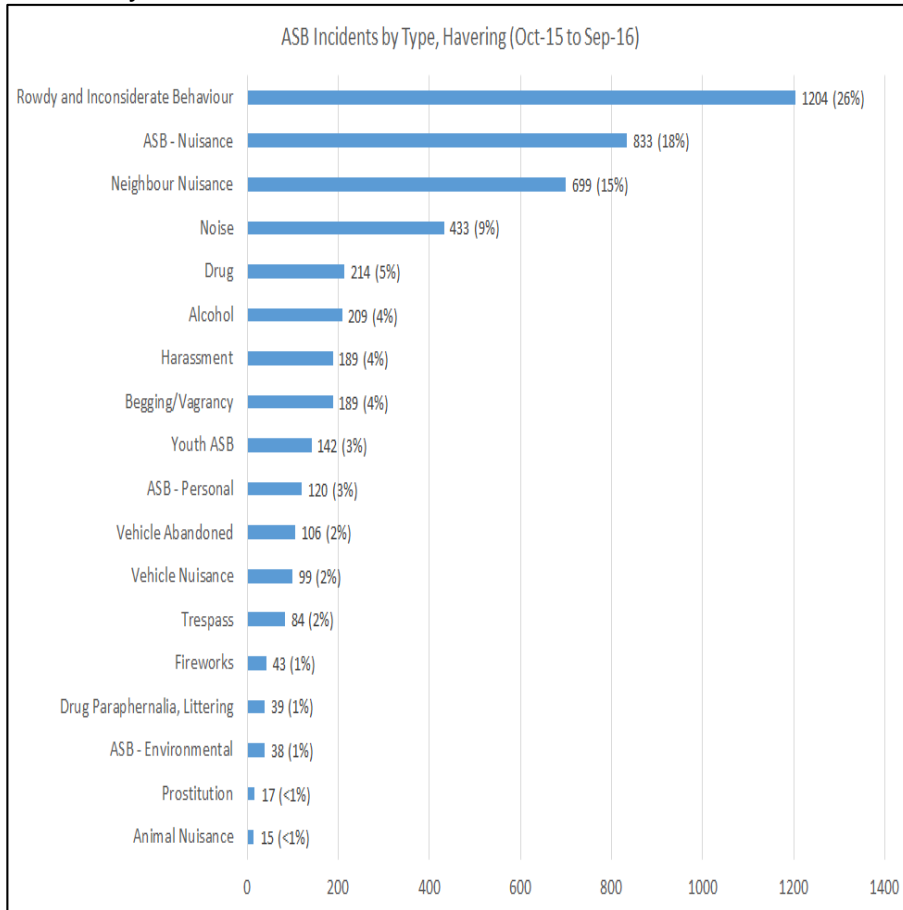


Figure 1

ASB and Crime

Table 2 below for 2014-15 data, provides the total number of records for noise complaints, police calls for service, police calls for domestic violence and total crime and crime related incident records, where the venue was a HMO. The total number of confirmed HMOs identified in Havering accounts for less than 0.3% of all properties (233 of approximately 100,000). Proportionately, these properties were over-represented in all areas observed (most notably calls regarding domestic violence and noise),.

Table 2

Category	No. Addresses	Total Number of Noise Complaints	Total Number of Police Calls (exc. Domestic Violence)	Total Number of Police Calls regarding Domestic Violence	Total Number of Crimes Recorded
HMO Public	31	2	11	10	13

Register					
Benefits List	35		17	25	14
Council Tax List	66		14	5	9
HM1 HMO Bedsits	52		22	23	21
HM2 HMO Section 257	7		1	7	10
HM3 HMO Shared House	27	1	2	4	23
Liberty Housing	15		5	2	9
Total HMOs	233	3	72	76	99

There is a strong correlation between the location of HMOs and significant areas where burglary is disproportionately high in Havering. There are 25 geographical areas of the borough which were identified as containing 40% of all household burglary in the previous 12-months. These 25 areas take up just 7% of the borough physical geographical area and contain 20% of the boroughs housing stock. Within these locations are 198 of our known HMO premises (84%).

It is worth noting that numerous burglary studies have found rates of burglary are higher in areas of private renting and areas with multiple HMOs due to the transient nature of the population in these locations (with many residents being short term), which can enable offenders to operate with more anonymity than they might in more established communities (social organisation and informal social control are more vulnerable in transient areas). Significant concentrations of HMOs in small geographical areas may lead to elevated levels of crimes such as household burglary and vehicle crime.

Age: Consider the full range of age groups		
<i>Please tick (✓) the relevant box:</i>	Overall impact: Houses in Multiple Occupation are more likely to be occupied by young people under the age of 35 as shared accommodation is often the only type of affordable accommodation available to benefit reliant tenants as a result of housing benefit caps for young people. Many of these individuals are forced to accept accommodation within the private rented sector as they usually have no access to social housing. Additional licensing proposals could impact on this group negatively in the short term due to the possibility that some landlords may seek to return converted houses currently used as bedsit type accommodation back into single family homes in order to avoid licensing requirements. This may result in consequential short term shortages of HMO accommodation and increased potential for evictions. This is however only expected to be the case for poorly managed properties in the worst condition and may have the beneficial effect of driving bad landlords out of the market which, in the longer term, should result in increased availability of better	
Positive (long term benefits)		✓
Neutral		
Negative (in the short term)		✓

		<p>quality and well managed bedsit type accommodation. Residents that are displaced as a result of this process will have access to housing advice albeit it may not be possible for the council to make a direct offer of alternative accommodation in all cases.</p> <p>Housing and the quality of housing has a major impact on health and wellbeing of all age groups. Investment in improving poor, overcrowded or inappropriate housing will improve the quality of life of residents and have a preventative effect on future health and social care need. By driving up standards, licencing in the long term can deliver better individual health outcomes</p>
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Evidence:

Table 3

	2014	Number	Percentage of population (%)
All persons		245,974	100.0
0-4 years		15,563	6.3
5-9 years		14,812	6.0
10-14 years		13,735	5.6
15-19 years		15,045	6.1
20-64 years		141,237	57.4
65+ years		45,582	18.6

Sources used: Mid-year population estimates 2014; Office for National Statistics (ONS); Produced by Public Health Intelligence.

Disability: Consider the full range of disabilities; including physical mental, sensory and progressive conditions

Please tick (✓) the relevant box:

Positive

Neutral

Negative

Overall impact: There are a significant number of tenants with mental health disabilities living in HMO accommodation. The potential risk to the number of available HMO units as a direct result of additional licencing could impact negatively on this group. However, the envisaged benefits of better quality housing accommodation that is well managed and complies with all relevant standards outweighs the possible negative impact that may result from implementing the proposed licencing scheme.

The council's Housing service has a duty to assist vulnerable adults to find alternative accommodation in cases where they have become unintentionally homeless, therefore it is expected that the majority of adversely affected individuals would be assisted to secure either temporary or permanent alternative accommodation.

Evidence:

- (1) Previous research has highlighted the relationship between mental health problems and HMOs. Shaw *et al.*,(1998) note that HMO residents are eight times more likely than the general population to suffer from mental health problems as well as having other

problems:

'These groups [living in HMOs] are more likely to be drug or alcohol-dependent, many have spent their early lives in care, or are ex-prisoners, and have nowhere else to go' (Shaw et al., 1998: 67

'Within HMOs some of the greatest threats to the mental health of tenants come from the actions of other tenants. Landlords currently have a duty to ensure that the behaviour of tenants in the property does not impinge on the surrounding community but it is not specified that tenants should be protected from the behaviour of other tenants'. (2)

'In terms of mental health, preventing ASB in the property will make tenants feel safer and more secure', (2)

'current legislation has the potential to contribute significantly to the safety and quality of housing and this is likely to positively affect the mental health of tenants, through creating a sense of safety and security' (2)

Sources used:

(1) Shaw M, Danny D and Brimblecombe N (1998)

Health problems in houses in multiple occupation.

Environmental Health Journal 106(10) 280-281.

(2) Professional Evaluation: Beyond safety to wellbeing: How local authorities can mitigate the mental health risks of living in houses in multiple occupation-

Dr Caroline Barratt, Christopher Kitcher and Dr Jill Stewart

Sex/gender: Consider both men and women	
<p><i>Please tick (✓) the relevant box:</i></p>	
Positive	<p>Overall impact:</p> <p>No differential impact has been identified on the grounds of this protected characteristic in respect of landlords who may be affected by the licensing proposals as it applies equally to all landlords operating in Havering irrespective of sex / gender.</p> <p>Evidence suggests that Houses in Multiple Occupation are twice as likely to be occupied by males, predominantly under the age of 30, as shared accommodation is often the only type of affordable accommodation available to them and they usually have no access to social housing accommodation.</p> <p>Additional licensing proposals could impact on this group negatively in the short term due to the possibility that some landlords may seek to return converted houses currently used as bedsit type accommodation back into single family homes in order to avoid licensing requirements which may result in consequential shortages of HMO accommodation and evictions.</p> <p>This is however only expected to be the case for poorly managed properties in the worst condition and may have the beneficial effect of driving bad landlords out of the market which, in the longer term, should result in increased availability of better quality and well managed bedsit type accommodation. Residents that are displaced as a result of this process will have access to housing advice albeit it may not be possible for the council to make a direct offer of alternative accommodation in all cases.</p>
Neutral	
Negative (short term only)	
	<p>✓</p>
<p>Evidence:</p> <p>Community Safety report using data collected from Havering databases and Metropolitan Police records stated that of all known HMOs in the Borough, 67% were occupied by males.</p>	
<p>Sources used:</p> <p>Data on noise nuisance collated by London Borough of Havering and Metropolitan Police records of reported crime and anti-social behaviour (for period April 2015-March 2016)</p>	

Ethnicity/race: Consider the impact on different ethnic groups and nationalities

Please tick (✓) the relevant box:

Positive

Neutral

Negative (short term)

Overall impact:

There is a significant concentration of migrant households in HMOs and low quality homes where this is the only affordable form of accommodation for a working household on low wages.

Vulnerable tenants, such as new arrivals in the country may be more likely to be affected by poor housing conditions. Overcrowding disproportionately affects migrants. PRS Tenants within ethnic minority groups are therefore likely to be adversely affected by licensing in the short term due to the potential of a shortage of HMO accommodation resultant from licensing requirements. However, they should be positively affected in the longer term by way of better quality accommodation and landlord management practices and more protection from eviction to be implemented through licence conditions. Housing advice will be available to any tenant that has been displaced as a consequence of licensing.

The PRS Landlord Licensing proposal applies equally to all landlords operating within the London Borough of Havering irrespective of ethnicity / race therefore this group will not be negatively affected. A range of measures will be implemented in order to support landlords to respond to reports of antisocial behaviour and unsocial tenants.

Evidence:

No local data is yet specifically available on the profile of protected characteristics associated with privately managed HMOs. This is because HMOs generally have highly transient occupants and /or data is not available to the council because currently licensing provisions under the Housing Act do not apply to the premises in question. Some equality profile data specific to the management of HMOs by the council itself is available and is detailed below, however that profile data will not necessarily be consistent with that of the private rented sector and it will not necessarily show the whole picture due to the complexity of data collection. It is included because it serves as a useful indicative benchmark about several of the protected characteristics

Equality Profile data for HMOs managed on behalf of LB Havering This data was collected about the profile of tenants who occupy HMOs managed by Liberty Housing in Havering. In respect of the proposed licensing designations subject of this Equality Assessment the data below does not specifically represent the picture for existing private sector HMOs and is referenced solely for guideline purposes.

Ethnicity- Summary Total tenants in sample: 91-		
Black African	8	8.8%
Black Caribbean	8	8.8%
Black other	4	4.4%
Not Known/ no response	6	6.6%
White and Asian	3	3.3%
White and Black African	2	2.2%

Sources used:

This snapshot data represents all tenants responding to survey who were occupying HMOs managed by Havering as at 9 June 2015 sourced from the housing database.

Religion/faith: Consider people from different religions or beliefs including those with no religion or belief

Please tick (✓) the relevant box:

Positive

Neutral

Negative

Overall impact:

No differential impact has been identified on the grounds of this protected characteristic. The Private Sector Landlord Licensing proposal applies equally to all tenants and Landlords operating within Havering irrespective of religion / faith. However housing advice will be available to any tenant that has been displaced as a consequence of licensing.

Evidence: N/A

Sources used: N/A

Sexual orientation: Consider people who are heterosexual, lesbian, gay or bisexual

Please tick (✓) the relevant box:

Positive

Neutral

Negative

Overall impact:

There is no information relating to sexual orientation of landlords.

Additional licensing aims to reduce anti-social behaviour which is likely to benefit people who suffer from homophobic crime and incidents. A range of measures will be implemented in order to support landlords to respond to reports of anti-social behaviour and unsocial tenants.

Evidence:

There is insufficient data available to measure accurately the potential effect of these proposals in relation to sexual orientation of tenants.

Sources used:

N/A

Gender reassignment: Consider people who are seeking, undergoing or have received gender reassignment surgery, as well as people whose gender identity is different from their gender at birth

<i>Please tick (✓) the relevant box:</i>		Overall impact: No differential impact has been identified on the grounds of this protected characteristic. The Private Sector Landlord Licensing proposal applies equally to all tenants and landlords operating in Havering irrespective of gender reassignment. Housing advice will be available to any tenant that has been displaced as a consequence of licensing.
Positive		
Neutral	✓	
Negative		
Evidence: N/A		
Sources used: N/A		

Marriage/civil partnership: Consider people in a marriage or civil partnership		
<i>Please tick (✓) the relevant box:</i>		Overall impact: No differential impact has been identified on the grounds of this protected characteristic. The Private Sector Landlord Licensing proposal applies equally to all tenants and landlords operating in Havering irrespective of marriage / civil partnership.
Positive		
Neutral	✓	
Negative		
Evidence: N/A		
Sources used: N/A		

Pregnancy, maternity and paternity: Consider those who are pregnant and those who are undertaking maternity or paternity leave		
<i>Please tick (✓) the relevant box:</i>		Overall impact: Proposed restrictions on numbers of occupants in HMO bedsit rooms may impact upon pregnant tenants as the addition of a baby may result in a breach of licence conditions where the total number of occupants in a room will exceed two persons. Landlords will be responsible for ensuring premises do not become overcrowded and therefore may be forced to take action to evict certain tenants that fall within this protected characteristic and thus increase risk of homelessness. Housing advice will be available to any tenant that has been displaced as a consequence of licensing and in many cases tenants
Positive		
Neutral		
Negative	✓	

	falling within this protected characteristic will be owed a homeless duty by the council's housing service.
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Evidence:

There is no available evidence to directly link homeless approaches from pregnant women to bedsit type accommodation but data recorded on homeless approaches by pregnant women and/ or applicants with dependent children is shown below.

Section E2: Applicant households found to be eligible for assistance, unintentionally homeless and in priority need during the quarter, by priority need category

Table 5

Total households with dependent children	Household includes, a pregnant woman and there are no other dependent children	6. Total applicants
86	11	122

*

Sources used:

Quarterly P1d Housing Statistical return (1/7/16 to 30/9/16) -from LBH Housing database-homeless approaches

Socio-economic status: Consider those who are from low income or financially excluded backgrounds

<i>Please tick (✓) the relevant box:</i>		<p>Overall impact: Vulnerable residents and those on low incomes have found that access to housing appropriate to their needs has been restricted by a lack of affordability and large numbers find themselves living in the worst PRS properties or shared accommodation. Changes to the national welfare system has had a negative impact on the provision of quality housing options due to displacement of benefit dependent households into cheaper shared accommodation as a result of the Local Housing Allowance rent caps. Some landlords may decide to increase rents or leave the private rented HMO market altogether as a result of introducing Additional HMO licensing in Havering and this could negatively impact tenants due to a reduction in the supply of HMO's and subsequent increase in evictions and homelessness.</p> <p>On the positive side, a significant protection that would be provided for assured shorthold tenants is that a s.21 Notice to evict tenants cannot be used by the landlord where a property has not been licensed when it is required to be and the Courts will therefore refuse to issue Possession Orders</p>
Positive in the long term	✓	
Neutral		
Negative in the short term	✓	

on that basis. The life chances of residents are closely linked to the quality of their neighbourhoods and their housing accommodation. Licensing seeks to address some of these issues by driving up the quality of the PRS and will improve housing conditions and security of tenure, particularly for the poorest tenants, over the longer term.

Evidence:

The council does not have data to demonstrate this expectation, however on the basis of experience of other Councils who have introduced additional licensing, the effects of licensing on tenants sharing this protected characteristic have not been reported to be significantly negative.

The proportion of households on low income benefits within the key areas affected by this scheme are shown in table 6 below:

Table 6

	Heaton Ward	Gooshays Ward	Haverling Average
Income support claimants (% of working age population)	3.47	3.68	1.74
Income Support claimants, Carers and others (% of Income Support claimants)	17.86	19.44	18.54
Income Support claimants, Incapacity Benefit reasons (% of Income Support claimants)	14.29	8.33	11.61
Income Support claimants, Lone Parent (% of Income Support claimants)	67.86	72.22	69.85

Sources used:

Haverling Data Intelligence Hub

Conclusion

Overall it is anticipated that the introduction of Additional Licensing is likely to bring about significant benefits to groups with protected characteristics, particularly those who are disadvantaged and who have no alternative to renting a room in a shared house in the private sector.

The main purpose of the scheme is to reduce anti-social behaviour and improve housing conditions which will benefit all residents and particularly those who have protected characteristics. Making our Borough a safe place to live is a top priority for Haverling Council and the implementation of landlord licensing schemes will support this vision.

Vulnerable groups will also benefit from overall improvements in management standards due to the ability of the council to better identify HMOs and the improved ability to enforce standards,, especially in the locations where the greatest problems currently exist.

The Equality Assessment has identified some potential for adverse impacts, particularly to the lower income groups, if landlords decide to increase rents or withdraw from the HMO rental market altogether as this could put tenants at an increased risk of homelessness. Although any

adverse impacts are only expected to be short term, the council proposes to mitigate this risk by proposing to offer a reduced licence fee to landlords who submit early licence applications. It is also proposed to launch a major publicity campaign when the Licensing scheme is introduced to make tenants and landlords aware of their rights and obligations and what tenants can do if threatened with eviction. Specific actions are set out in more detail in the action plan below.

Overall it is considered that the benefits of this initiative far outweigh any negative impacts to groups with protected characteristics.

If the proposed Licensing Scheme is introduced, it is intended to closely monitor the situation on an ongoing basis and to carry out a major review after the scheme has been in place for 12 months.

Action Plan

In this section you should list the specific actions that set out how you will address any negative equality impacts you have identified in this assessment.

Protected characteristic	Identified negative impact	Action to be taken to mitigate impact*	Intended outcomes and monitoring**	Timescale of actions	Lead officer
Sex/Gender	Males, particularly those under the age of 35 may be negatively impacted by the implementation of Additional HMO licensing as bedsit unit numbers may reduce as a direct result of licensing and enforcement of standards leading to a consequential rise in the number of evictions	Wherever possible, displaced private tenants to be supported by rehousing within existing stock of privately leased shared accommodation managed by the Housing Department. All other tenants who are at risk of eviction will be advised of their housing options.	Numbers of homeless declarations from young males resulting from closure of HMOs due to licensing requirement to be monitored.	From designation of the additional licensing scheme and ongoing	PRS Licensing Lead
Ethnicity/Race	Migrant households with no entitlement to public funds or social housing may be displaced due to their inability to afford potential increases in rent or reduction in availability of shared accommodation	Licensing will prevent lawful eviction of tenants from premises which are required to be, but not licensed, so should provide additional protection from eviction in some cases. Early bird discounts to reduce license feeshave been incorporated into fee structure in order to minimise the risk of rent increases for tenants.	Numbers of households presenting as homeless to be monitored by housing department	From designation of the additional licensing scheme and ongoing	PRS Licensing Lead

Pregnancy Maternity & Paternity	Pregnant women and new mothers may face eviction from HMO accommodation as a result of licensing and enforcement of licence conditions limiting occupancy	Housing authority to exercise homelessness duties to eligible tenants by assisting tenants to secure alternative suitable accommodation either in private rented or social housing sector	Housing Department to exercise homeless duties to vulnerable residents	From designation of the additional licensing scheme and ongoing	PRS Licensing Lead
Socio-economic status	Low income/benefit dependant households	<p>Licensing will be beneficial in the longer term as housing standards should improve and greater security of tenure will discourage landlords from exploitation of vulnerable tenants.</p> <p>Licence fees have been set at a level designed to cover costs in order to minimise the burden on landlords and to minimise the likelihood that the charges will be passed onto tenants through increased rents. An early bird discount is also being offered so that landlords can benefit from a reduced fee if they submit their application before the scheme is formally implemented.</p>	Private tenants to be supported if there are negative consequences arising from the council's enforcement approach	From designation of the additional licensing scheme and ongoing	PRS Licensing Lead

Review

. A review of this EIA will be carried out after 12 months of the scheme's implementation then annually thereafter in order to ascertain if there has been any significant negative impact upon groups with protected characteristics.