

## Equality & Health Impact Assessment (EqHIA)

### Document control

<b>Title of activity:</b>	<b>Housing Enforcement Policy - Update to incorporate Renters Rights Act 2025</b>
<b>Lead officer:</b>	Helen Oakerbee, Director of Planning and Public Protection
<b>Approved by:</b>	Helen Oakerbee, Director of Planning and Public Protection Patrick Odling-Smee, Director of Living Well. Councillor Barry Mugglestone
<b>Date completed:</b>	April 2026
<b>Scheduled date for review:</b>	April 2029

<b>Did you seek advice from the Corporate Policy &amp; Diversity team?</b>	Yes
<b>Did you seek advice from the Public Health team?</b>	Yes
<b>Does the EqHIA contain any confidential or exempt information that would prevent it from being published it on the Council's website?</b>	No

# 1. About the activity

1	<b>Title of activity</b>	Housing Enforcement Policy - Update to incorporate Renters Rights Act 2025		
2	<b>Type of activity</b>	The main provisions of the Renters Rights Act 2025 come into force on 1st May 2026. This replaces the existing Housing Enforcement Policy to be in full compliance with the new legislation.		
3	<b>Scope of activity</b>	This activity applies to all residents, regardless of any protected characteristics that may apply.		
4a	<b>Are you changing, introducing a new, or removing a service, policy, strategy or function?</b>	No		
4b	<b>Does this activity have the potential to impact (either positively or negatively) upon people (9 protected characteristics)?</b>	Yes		
4c	<b>Does the activity have the potential to impact (either positively or negatively) upon any factors which determine people's health and wellbeing?</b>	Yes		

<b>Completed by:</b>	James Delaney, Senior strategy & policy officer (LBH)
<b>Date:</b>	April, 2026

## 2. Background/Context

The Council is updating its Private Sector Housing Enforcement Policy and Civil Penalty Policy to ensure compliance with the Renters' Rights Act 2025, with the main provisions coming into force on 1 May 2026.

The revised framework reflects the Act's expanded civil penalty regime, updated offences and amended thresholds, and the statutory duty on local housing authorities to enforce defined "landlord legislation" (including the shift away from relying on informal resolution as the default approach where the statutory duty applies).

The new policy provides a clear and consistent decision-making framework for enforcement activity, supports legal robustness and reduces risk of challenge by aligning local practice with the nationally recognised model policy approach developed by the Association of Chief Environmental Health Officers (ACEHO). Transitional arrangements will allow the existing and

new policies to operate in tandem for a limited period to conclude legacy cases, with the applicable policy determined by the date the offence was committed.

The updated policy is expected to have an overall positive impact on equality and health outcomes by strengthening the Council's ability to address serious hazards and unlawful landlord practices in the PRS, applying enforcement consistently and proportionately, and supporting the Council's Public Sector Equality Duty.

### Who will be affected by the activity?

#### Primary groups affected

- **Private rented sector (PRS) tenants and household members** living in privately rented homes in Havering, including those with vulnerabilities and those at higher risk from poor housing conditions.
- **Landlords and managing agents** operating PRS accommodation in Havering, including those subject to civil penalties and associated enforcement action.

#### Secondary groups affected

- **Wider residents and communities**, where improved housing conditions and stronger compliance contribute to safer homes and improved wellbeing.

### Protected Characteristic - AGE

		<b>Overall impact:</b>
<b>Positive</b>	x	The updated Housing Enforcement framework is expected to have a positive impact across age groups by strengthening tenant protections and ensuring a more consistent, transparent approach to enforcement and civil penalties.
<b>Neutral</b>		
<b>Negative</b>		<p>In addition to addressing serious risks in homes, the Renters' Rights Act 2025 introduces specific enforceable offences relating to discrimination against families with children in the lettings process, which the updated policy framework supports the Council to apply consistently through civil penalties.</p> <p>The new policy strengthens the Council's capacity to take proportionate enforcement action to secure remedy of serious hazards in PRS accommodation. This is expected to benefit households across all ages, including children and older people where poor conditions (e.g. hazards impacting safety and wellbeing) may be most harmful.</p> <p>There is also a wider positive impact through tackling unfair market practices, including rental bidding offences (e.g. failure to state rent in adverts and inviting/accepting offers above the stated rent), which can disproportionately affect households competing for PRS accommodation.</p>

## Protected Characteristic - DISABILITY

		<b>Overall impact:</b>
<b>Positive</b>	x	<p>Disabled residents are a significant part of Havering's population. Census 2021 analysis for Havering reports a proportion of 15% of residents identifying as disabled (38,449 residents), and 30,000 households with at least one disabled person. There is significant variation across neighbourhoods, with nearly 2.5x more households with a disabled person in Harold Hill East (1,605) compared with Emerson Park (596). Disability impacts are relevant across the borough and may be more pronounced in neighbourhoods with greater reliance on the private rental sector.</p> <p>The updated Housing Enforcement Policy and related Civil Penalty Policy are expected to have a positive impact for disabled residents by strengthening and standardising protections for private renters, including clearer routes for reporting and enforcement action where landlord practices are unlawful or harmful.</p> <p>The Key Decision Report identifies a specific equalities risk of differential access to reporting and enforcement outcomes for residents with disabilities and sets out mitigation through accessible communications and reporting routes and reasonable adjustments where required, with monitoring of outcomes and complaint themes to identify disproportionate impacts.</p> <p>In practice, this means the Council will apply an evidence-led, risk-based approach and ensure that disabled residents are not disadvantaged by barriers such as communication needs, mobility constraints, sensory impairment, learning disability, or mental health related needs. Where vulnerabilities are identified, officers will use sensitive communication, offer reasonable adjustments, and signpost or use partner routes where appropriate, particularly where enforcement activity may affect housing stability.</p> <p>Outcomes and complaint themes will be monitored to ensure equitable access and to address any emerging disproportionate impacts.</p>
<b>Neutral</b>		
<b>Negative</b>		

## Protected Characteristic – SEX/GENDER

		<b>Overall impact:</b>
<b>Positive</b>	x	<p>Census 2021 figures indicate that females make up 51.8% of the population and males 48.2% in Havering.</p> <p>The updated Housing Enforcement Policy and associated civil penalty framework is expected to have a positive impact for residents of all genders by strengthening housing security, fairness and protections in the private rented sector, and by supporting consistent enforcement against unlawful landlord/agent behaviours.</p>
<b>Neutral</b>		
<b>Negative</b>		

	<p>Increased housing security and stability benefits all genders as the Act strengthens rental security by ending “no-fault” evictions and moving PRS tenancies to assured periodic “rolling” tenancies, giving tenants more confidence to remain in their home unless a landlord uses a valid legal route.</p> <p>This strengthens practical stability for households that may be more exposed to insecurity and instability, and it supports wider wellbeing by reducing sudden tenancy loss.</p> <p>Fairer rent practices and reduced “price pressure” behaviours will benefit all residents and helps counter market practices that can disadvantage households. Additionally limiting rent increases to once per year, requiring notice, and with protections if unfair, further strengthens affordability protections for renters.</p> <p>Stronger protections for families and equal access in the rental market makes it illegal for landlords or agents to refuse to let a property because a household has children or receives benefits and prohibits discriminatory terms in adverts or policies. These are now enforceable behaviours strengthening deterrence and consistency.</p> <p>Stronger tenancy security and clearer enforcement expectations can support all residents by improving confidence that unlawful landlord behaviours will be addressed and by supporting consistent signposting to support pathways where additional risk is identified.</p>
--	--

<b>Protected Characteristic – ETHNICITY/RACE</b>		
		<b>Overall impact:</b>
<b>Positive</b>	x	Havering’s population has become more ethnically diverse over time. Census 2021 data shows White British remains the largest ethnic group at 66.5% (174,232), down from 83.3% (197,615) in 2011.
<b>Neutral</b>		The next most common ethnic group is Asian, accounting for 10.7% (28,150), up from 4.9% (11,545) in 2011.
<b>Negative</b>		<p>The updated Housing Enforcement Policy is expected to have a positive impact for residents across all ethnic groups by strengthening PRS tenant protections and ensuring a more consistent, transparent approach to enforcement and civil penalties.</p> <p>The policy aims also include providing transparent and consistent regulation in the private rental sector and creating a level playing field by tackling non-compliant landlords, supporting fairer outcomes for tenants across all communities.</p>

		<p>Local data indicates that most residents in Havering (90%) report English as their main language, but a minority of residents speak other languages, which may create barriers to accessing information, advice and reporting routes if not addressed.</p> <p>The updated approach places emphasis on ensuring residents are not disadvantaged by communication barriers (including literacy, language needs or confidence in formal processes). Where barriers are identified, officers will use accessible communication, and where appropriate will signpost or use partner routes to support residents and reduce the risk of unequal access to enforcement outcomes.</p> <p>Outcomes and complaint themes will be monitored to ensure equitable access and to address any emerging disproportionate impacts.</p>
--	--	--

Protected Characteristic – RELIGION/FAITH		
		<b>Overall impact:</b>
<b>Positive</b>	x	Religion and faith is relevant to equality considerations in Havering because the borough has a mix of faiths and beliefs, and the profile has changed over time.
<b>Neutral</b>		
<b>Negative</b>		<p>Census 2021 data cites that the religion question is voluntary but had a high response rate (94.5% in 2021). The most reported religion in Havering is Christian (52.2%), down from 65.6% in 2011. No religion was the second most common response (30.6%), up from 22.6% in 2011, and other religions accounted for 11.7% of the population, up from 5.1% in 2011.</p> <p>The updated Housing Enforcement Policy is expected to have a positive impact for people of all religions and beliefs because it strengthens protections and fairness for private renters regardless of faith, supporting a more consistent and transparent local approach to enforcement.</p> <p>In practice, the benefits of the Renters' Rights reforms apply equally across faith groups and those with no religion for example: strengthened security and fairness in the PRS and clearer standards for landlord/agent conduct.</p> <p>The Council's approach to engagement and communications is also relevant for ensuring that residents from different faith communities can access information and support routes. Effective consultation and engagement help identify impacts on different faith groups, and support the intention to engage with all faith groups in community engagement activity.</p>

--	--	--

Protected Characteristic - Sexual orientation		
		<b>Overall impact:</b>
<b>Positive</b>	<b>x</b>	<p>No specific disproportionate impacts relating to sexual orientation have been identified. The updated policy is expected to have a positive impact by strengthening tenant protections and ensuring enforcement decisions are made consistently and proportionately, with equalities impacts considered and adverse impacts mitigated where possible.</p> <p>The Council will mitigate risks (e.g., stress/anxiety during investigations and potential housing stability impacts for vulnerable households) through a risk based approach, accessible communications and signposting/partner routes where appropriate, with monitoring of outcomes and complaint themes.</p>
<b>Neutral</b>		
<b>Negative</b>		

Protected Characteristic - Gender reassignment		
		<b>Overall impact:</b>
<b>Positive</b>		<p>No specific disproportionate impacts relating to gender reassignment are identified. The updated framework is expected to have a positive impact by strengthening PRS tenant protections and supporting fair, consistent application of enforcement powers, with equalities impacts considered and adverse impacts mitigated where possible.</p> <p>As with other characteristics, the Council will mitigate risks around access and potential adverse impacts through accessible communications, reporting routes, reasonable adjustments where required, and monitoring of outcomes/complaint themes.</p>
<b>Neutral</b>	<b>x</b>	
<b>Negative</b>		

Protected Characteristic - Marriage/Civil partnership		
		<b>Overall impact:</b>
<b>Positive</b>		<p>The updated Housing Enforcement Policy applies to all residents and private renters regardless of marital status or whether they are in a civil partnership.</p> <p>The policy strengthens tenant protections and sets clearer expectations of landlord/agent conduct across the PRS, including stronger security and fairness measures such as ending “no-fault” evictions and introducing rolling tenancies, tighter controls on rent increases, and a ban on rental bidding and large upfront payments.</p>
<b>Neutral</b>	<b>x</b>	
<b>Negative</b>		

		<p>These protections are available to all households, including married couples and civil partners, and therefore support fairer outcomes regardless of relationship status.</p> <p>Overall, no differential impacts are expected because the updated enforcement approach is applied consistently across households irrespective of relationship status.</p>
--	--	---

Protected Characteristic - Pregnancy, maternity and paternity		
		<b>Overall impact:</b>
<b>Positive</b>	<b>x</b>	<p>Pregnancy and maternity are relevant to equality and health considerations because housing conditions are an important determinant of health and wellbeing, and the updated enforcement framework supports timely remedy of serious issues in the PRS.</p>
<b>Neutral</b>		
<b>Negative</b>		<p>As housing conditions can negatively impact health an enforcement approach that supports timely remedy of serious hazards will have a positive impact on health protection. This is particularly relevant for households with pregnant people and babies/young children where safe, warm and secure housing is especially important.</p> <p>Havering’s general fertility rate (live births per 1,000 women aged 15–44 over 2016–2020) is higher in Havering (65.4) than England (59.2). The Havering Joint Strategic Needs Assessment 2025 provides additional Havering context for maternal health and births, including that 3,019 babies were born to Havering residents in 2023/24.</p> <p>These indicators reinforce why safe housing conditions alongside clear access to support and enforcement routes remain important for pregnant residents and new parents.</p> <p>The Renters’ Rights Act introduces improvements that can support pregnancy/maternity outcomes, including stronger security in the home, fairer rules on rent, and new timescales/standards for damp and mould linked to Awaab’s Law, alongside wider improvements to housing standards in the PRS.</p> <p>These changes are expected to contribute positively by reducing risks associated with poor conditions and instability during pregnancy and early parenthood.</p>

Protected Characteristic - Socio-economic status		
		<b>Overall impact:</b>
<b>Positive</b>	<b>x</b>	Socio-economic status is a key factor in housing vulnerability and is relevant to the updated Housing Enforcement Policy because low-income households are more likely to be exposed to affordability pressures, insecure housing, and poor conditions in the private rented sector.
<b>Neutral</b>		
<b>Negative</b>		<p>While Havering has an overall lower average deprivation score than London and England (16.8 in Havering vs 21.8 London and 21.7 England), there is substantial variation within the borough, with some areas being significantly more deprived.</p> <p>Local income indicators show that (as of 2019/20) net annual household income estimates before housing costs were £35,331 in Havering (compared with £37,864 London and £32,797 England), and that the proportion of adults who are income deprived was 10.8% (below the national average 12.9%).</p> <p>According to Census 2021 unemployment in Havering is 3.9% (vs 5.1% London and 3.7% England) and Havering residents have lower weekly earnings than London (workplace median weekly earnings £802.10 vs £905.50 London. It also notes a lower proportion of residents in managerial/professional occupations (49.4%) compared with London (63.1).</p> <p>The updated enforcement framework and Renters' Rights Act reforms are expected to have a positive socio-economic impact by strengthening market fairness and reducing affordability barriers in the PRS. Havering's tenant guidance sets out reforms that benefit households under financial pressure: limiting rent increases to once per year with notice and challenge routes; banning rental bidding; limiting rent in advance; and making it unlawful to refuse to let to households because they receive benefits or have children. These measures are directly relevant to low-income renters and households relying on welfare support.</p> <p>Local evidence indicates that damp and mould are particularly prevalent in private rental accommodation highlighting the importance of effective enforcement to improve housing standards for low-income households.</p> <p>The Council will monitor complaint themes and outcomes to identify whether impacts differ for financially vulnerable households and to ensure that enforcement and signposting routes support fair access.</p>

Protected Characteristic - Health & Wellbeing		
		<b>Overall impact:</b>
<b>Positive</b>	<b>x</b>	

<b>Neutral</b>	
<b>Negative</b>	<p>Housing conditions are a key determinant of health and wellbeing, and the updated Enforcement Policy supports improved outcomes by enabling proportionate action to address serious risks in private rented homes and by securing remedy of serious issues.</p> <p>Damp and mould can cause serious illness and can affect mental health; an enforcement approach that supports timely remedy of serious hazards supports the health and wellbeing of residents .</p> <p>The Renters’ Rights Act reforms strengthen protections that can support health and wellbeing, including increased security of tenure and clearer routes for challenge and redress, as well as the measures to improve housing standards in the PRS.</p> <p>Private landlords must meet the Decent Homes Standard (for the first time in the private sector) and that new timescales for dealing with damp and mould are linked to Awaab’s Law; these changes are relevant to health because they support earlier action to prevent prolonged exposure to hazardous home conditions.</p> <p>Housing enforcement that improves standards, reduces unlawful practices, and supports stable tenancies can contribute to wider system aims to prevent avoidable housing crisis and related health harms.</p>

## Review

This equality assessment will be reviewed when the policy is updated.

**Scheduled date of review:** April 2029