

Appendix 7

Equalities Impact Assessment

EQUALITY IMPACT ASSESSMENT

The Equality Act 2010 places a 'General Duty' on all public bodies to have 'due regard' to the need to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity for those with 'protected characteristics' and those without them
- Fostering good relations between those with 'protected characteristics' and those without them.

In addition the Council complies with the Marriage (same sex couples) Act 2013.

Stage 1 – Screening

Please complete the equalities screening form. If screening identifies that your proposal is likely to impact on protected characteristics, please proceed to stage 2 and complete a full Equality Impact Assessment (EqIA).

Stage 2 – Full Equality Impact Assessment

An EqIA provides evidence for meeting the Council's commitment to equality and the responsibilities under the Public Sector Equality Duty.

When an EqIA has been undertaken, it should be submitted as an attachment/appendix to the final decision making report. This is so the decision maker (e.g. Cabinet, Committee, senior leader) can use the EqIA to help inform their final decision. The EqIA once submitted will become a public document, published alongside the minutes and record of the decision.

Please read the Council's Equality Impact Assessment Guidance before beginning the EqIA process.

| 1. Responsibility for the Equality Impact Assessment | |
|---|---|
| Name of proposal | Property Licensing – Borough wide Additional HMO Licensing Scheme |
| Service area | Community Safety & Enforcement |
| Officer completing assessment | Lynn Sellar |
| Equalities/ HR Advisor | |
| Cabinet meeting date (if applicable) | 12 th February 2019 |
| Director/Assistant Director | David Murray – Assistant Director, Environment and Neighbourhoods |

2. Summary of the proposal

Please outline in no more than 3 paragraphs

- *The proposal which is being assessed*
- *The key stakeholders who may be affected by the policy or proposal*
- *The decision-making route being taken*

The Council is proposing to extend the current Additional Licensing scheme for HMOs not governed by Mandatory Licensing. All licensing schemes are intended to address the impact of poor quality housing, rogue landlords and anti-social tenants. In an area subject to licensing, all private landlords must obtain a licence and if they fail to do so, or fail to achieve acceptable management standards, the authority can take enforcement action. Schemes run for a maximum period of five years and a fee is payable for each licence.

Licensing offers the following benefits:

- Provide an improved strategic approach to managing the sector
- Help to identify all properties that are rented out privately
- Establish a register of landlords operating in Haringey
- Give us the opportunity to inspect the properties to assess living conditions and to offer advice to landlords, managing agents and tenants about their obligations.
- Redefine how the service operates by shifting the emphasis from a customer complaints led, reactive service.
- Ensure that a proper standard of management of privately rented property is maintained and that properties do not become, dangerous and/or severely overcrowded
- Reduce the levels of anti-social behaviour in the borough and take action against those whose properties or tenants cause persistent ASB
- Reduce enviro-crime locally including improvement in the management of waste

Stakeholders directly affected by the proposal:

Private sector landlords, managing agents and their tenants within the areas in scope will be directly affected by the proposals.

We anticipate that the majority of residents will be positively affected by the proposal.

Council employees may be affected (change in the operating model) Further work is required to understand the full implication of the impact on staff. Any changes will be addressed in line with the Council's HR policies and a separate EqIA completed if necessary.

Timeline:

A report was presented at the Cabinet meeting of 14th November 2017 and Members agreed to a borough wide public consultation on the proposal. The consultation ran for 12 weeks between 12th December 2017 and 5th March 2018.

Following the statutory consultation period, a report will be presented to Members of the Cabinet in February 2019 for the introduction of a borough wide additional HMO Licensing scheme.

A comprehensive publicity campaign will take place February 2019-May 2019

The licensing scheme will be launched in May 2019

3. What data will you use to inform your assessment of the impact of the proposal on protected groups of service users and/or staff?

Identify the main sources of evidence, both quantitative and qualitative, that supports your analysis. Please include any gaps and how you will address these

This could include, for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national. For restructures, please complete the restructure EqIA which is available on the HR pages.

| Protected group | Service users | Staff |
|---------------------|--|-------|
| Sex | <p><i>Equalities Profile of Haringey – 2013 Mid Year estimates:</i> http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf</p> <p><i>Property Licensing Consultation</i></p> | |
| Gender Reassignment | <p>EHRC national data Property Licensing Consultation</p> | |
| Age | <p><i>Equalities Profile of Haringey – 2013 Mid Year estimates:</i> http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf</p> <p><i>Property Licensing Consultation</i></p> | |

| | | |
|-----------------------------------|---|--|
| | <i>MHCLG English Housing Survey, Private Rented Sector (2017)</i> | |
| Disability | <p><i>Equalities Profile of Haringey – 2013 Mid Year estimates:</i> http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf</p> <p><i>ONS Disability in England & Wales, 2011</i></p> <p><i>Property Licensing Consultation</i></p> <p><i>MHCLG English Housing Survey, Private Rented Sector (2017)</i></p> | |
| Race & Ethnicity | <p><i>Equalities Profile of Haringey – 2013 Mid Year estimates:</i> http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf</p> <p><i>Property Licensing Consultation</i></p> <p><i>MHCLG English Housing Survey, Private Rented Sector (2017)</i></p> | |
| Sexual Orientation | <p>ONS sub-national sexual identity data, 2013-15</p> <p><i>Property Licensing Consultation</i></p> | |
| Religion or Belief (or No Belief) | <p><i>Equalities Profile of Haringey – 2013 Mid Year estimates:</i> http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf</p> | |
| Pregnancy & Maternity | <p><i>Census, 2011</i></p> <p><i>Property Licensing Consultation</i></p> | |
| Marriage and Civil Partnership | <p><i>Equalities Profile of Haringey – 2013 Mid Year estimates:</i> http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf</p> <p><i>Property Licensing Consultation</i></p> | |

Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the impact on wider service users and/or the borough's demographic profile? Have any inequalities been identified?

Explain how you will overcome this within the proposal.

Further information on how to do data analysis can be found in the guidance.

Haringey is an exceptionally diverse and fast-changing borough.

Haringey has a population of 254,900 according to the 2011 National Census made up of 101,955 households. The number of households in Haringey has continued to increase since 2011.

The borough ranks as one of the most deprived in the country with pockets of severe deprivation in the east. Haringey is the 13th most deprived borough in England and the 4th most deprived in London.

Home ownership in Haringey remains lower than London at 38.9% with the level of private renting amongst the highest in London. The level of over occupancy in Haringey is significantly above that for London.

The 2011 census recorded a reduction in full time workers and an increase in part time and self-employed workers. The 2011 census recorded that more people in Haringey identified as never having worked or in long-term unemployment than in London. Over a quarter of households (28%) living in Haringey have no adult in employment. This figure is similar to that of London as a whole.

Our key finding of our analysis in relation to key equalities characteristics are as follows:-

Age

Haringey has a relatively young population with a quarter of the population under the age of 20, and 91% of the population aged under 65 (89% London and 83% England). 38% of the borough's population is aged 25-39 higher than the London. The Borough has a higher proportion of young adults and a smaller proportion of older people than in the rest of London. There are more children living in the East of our borough than in the west.

The private rented sector (PRS) is increasingly being used as an alternative to home ownership for young people who cannot afford to get onto the property ladder. We know that private renting is being used increasingly by families with young children. Haringey has a higher than average population of young adults and so it is likely that young adults are over-represented in the private rented sector.

Young children are over-represented in the private rented sector and notably in properties which are in poorer condition. Moreover, private renters are, on average, younger than social renters and owner occupiers, with a mean age of 40 years (compared with 52 years for social renters and 57 years for owner occupiers).

Disability

14% of residents have a long-term health problem that limits their day to day activity, lower than England but in line with London. 5.7% of residents report being in bad health, slightly higher than England and London.

In 2016-17, 23% of privately rented households in the UK reported a household member with a long-term illness or disability. It is therefore likely that a higher proportion of residents in the private rented sector have a long-term illness or disability than is generally the case in Haringey.

The English House Condition Survey 2015-16 identified that 23% of households in the private rented sector included at least one member who had a long-term illness or disability, lower than the proportion of such households in the social rented sector; where 49% of households included someone with a long-term illness or disability. Among owner-occupiers, 29% of households had at least one member with a disability or long-term illness. Although this is higher than in the private rented sector, this might be due to the fact that owners are in general older than renters and are therefore more likely to have age-related illness or disability.

Gender reassignment

The council does not have local data regarding this protected characteristic. There is no reason to believe that there will be specific impacts for this protected group and we will try to ensure that discrimination, harassment and victimisation is tackled based upon this and any other protected group.

Pregnancy and maternity

The number of children born to Haringey residents has been increasing year on year since 2002 in line with the London and England trend. The birth rate (births per 1000 of the population) in Haringey has been consistently higher than London in this period until 2008 and is now level with London. In 2012 there were 4,209 births in Haringey.

Lone parents, of whom the vast majority are women, are over-represented in the private rented sector and notably in properties which are in poorer condition.

Race and Ethnicity

Almost two-thirds of the borough's population, and over 70% of its young people, are from ethnic minority backgrounds. Haringey's population is the fifth most ethnically diverse in the country with over 100 languages spoken. Over 65% of residents come from non-White British communities, compared to 20% in England and 55% for London. 190 different languages are spoken in our schools. The proportion of non-White British communities varies from 35.2% in Muswell Hill in the west of the borough to 83.4% in Northumberland Park in the east of the borough.

BAME individuals are over-represented in the private rented sector and notably in properties which are in poorer condition. It is notable that migrants are more likely than UK nationals to live in private-rented accommodation.

Religion and belief

Haringey is one of the most religiously diverse places in the UK. The most common religion was Christianity, accounting for 45% of residents, less than London (48.4%) and less than England (59.4%). The next most common religions were Muslim (14.3%) – higher than London (12.3%) – and Jewish (3%). Haringey had a lower percentage of residents who were Hindu (1.8%) and Sikh (0.3%) than London (5.0% and 1.5%),

respectively). A quarter of Haringey residents stated that they did not have a religion, higher than London (20.7%).

We do not have local data regarding the representation of this protected group in the private rented sector. However, we know that recent and second-generation migrants in the UK are likely to live in the private rented sector rather than social or privately owned housing. It is likely that a significant proportion of these individuals will be members of minority faith groups and are therefore represented among private rented sector tenants.

There is no reason to believe that there will be specific impacts for this protected group and we will try to ensure that discrimination, harassment and victimisation is tackled based upon this and any other protected group.

Sex

There is a relatively equal gender split in Haringey, just over half of the population is female (50.5%), in line with England and London.

The English House condition Survey 2015-16 identified that 61% of households in the PRS had a male HRP. Lone parents, of whom the vast majority are women, are over-represented in the private rented sector and notably in properties which are in poorer condition.

Sexual orientation

3.2% of London residents aged 16 or over identified themselves as lesbian, gay or bisexual in 2013 (ONS Integrated Household Survey). In Haringey this equates to 6,491 residents.

We do not have local data regarding the representation of this protected group in the private rented sector. There is no reason to believe that there will be specific impacts for this protected group and we will try to ensure that discrimination, harassment and victimisation is tackled based upon this and any other protected group.

Marriage and Civil partnership.

A third of the population of Haringey is made up of single households.

Lone parent households account for 10% of the borough's household make up.

Haringey has a higher proportion of couples in a registered same sex civil partnership than England and London. 0.6% (or 1,191 residents), compared to 0.2% for England and 0.4% for London.

We do not have local data regarding the representation of this protected group in the private rented sector. There is no reason to believe that there will be specific impacts for this protected group and we will try to ensure that discrimination, harassment and victimisation is tackled based upon this and any other protected group.

All groups who own, manage or live in privately rented accommodation are likely to be affected by the introduction of a property licensing scheme. People of ethnic minority origin, single parents and young children and certain vulnerable people are key tenant

groups and are therefore likely to be affected as they are over-represented in the private rented sector and notably in properties which are in poorer condition.

Generally, the effect of property licensing is to formalise the lightly regulated private rented housing market by imposing an increased regulatory framework to force obligations on landlords / licence holders. It should lead to better quality accommodation and greater community stability for groups who are unable to access social housing or homeownership. Therefore it can assist with community cohesion and tackle exclusion. Better managed private sector dwellings also improve the quality of life of many other Haringey residents, as they are often indirectly affected by low level neighbourhood anti-social behaviour such as fly tipping and noise.

The introduction of a borough wide Additional Licensing scheme will enable us to collect data on demographics/equalities of people living in, managing and owning private sector dwellings in Haringey.

4. a) How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff?

Please outline which groups you may target and how you will have targeted them

Further information on consultation is contained within accompanying EqIA guidance

During the consultation period (12 weeks) we used a wide range of consultation techniques to ensure that all sections of the community had an opportunity to take part. This included:

- Email to 600 landlords/Letting Agents operating in Haringey Council.
- Hand delivered letter to every household within the proposed 29 Selective Licensing areas (approximately 30,000).
- Approximately 36,000 letters hand delivered to identified private sector properties in the borough.
- Leaflets, Posters and paper questionnaires distributed to Libraries.
- Information available on the Council's, web site.
- Officers attending the Borough Wide Neighbourhood Watch Meeting and local Neighbourhood Watch meetings.

- Details of the consultation emailed to all London Boroughs to share with their landlord' forums/letting agents.
- Press release and consultation picked up by:
 - Local: Ham and High, Parikiaki, Tottenham Independent
 - National: BBC Newsround
 - Trade Press: Residential Landlord Association, Landlord Today, Housing 24.
- Bridge Renewal Trust promoted the consultation through weekly e-bulletin and social media.
- Details of the consultation sent to HFH Resident' Associations and all Neighbourhood Watch representatives.
- Article in Haringey People Magazine – distributed to all households in the borough.
- Regular reminders with links to the consultation were posted out via Social Media.
- 2 appearances in Haringey People extra – emailed to 40,000 subscribers.

Our approach was independently evaluated by a third party to ensure compliance. All consultation material was translated on request, and hard copies of the questionnaire made available at various locations across the borough.

4. b) Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics

Explain how will the consultation's findings will shape and inform your proposal and the decision making process, and any modifications made?

A public consultation exercise ran from 12th December 2017 to 5th March 2018. Consultation activities included an online questionnaire, four public meetings, nine drop in sessions at various locations across the borough and a dedicated phone line. In addition, the Bridge Renewal Trust were asked to independently hold a number of focus groups with private sector tenants and partner agencies, specifically they were asked to target tenants with protected characteristics.

We estimate that the consultation resulted in just over 900 people either taking part and offering feedback on the proposals or/and making contact to discuss the proposals in more detail. The results are broken down as follows:

| | |
|--|----------------|
| Completed the online-questionnaire | 607 |
| Attended a Public meeting | 99 |
| Telephone/Face to face contact | 150.(estimate) |
| Attended a Bridge Renewal Focus Group/Telephone interview. | 57 |

M.E.L. Research on line questionnaire

Break down of respondents

As part of the on-line consultation, equality monitoring information was collected. A breakdown of respondents by protected groups is set out below.

AGE

How old are you? (585 respondents completed this question)

| | |
|-------------------|-----|
| Under 20 | 0% |
| 21-24 | 1% |
| 25-29 | 4% |
| 30-44 | 33% |
| 45-59 | 34% |
| 60-64 | 9% |
| 65-74 | 10% |
| 75-84 | 2% |
| 85-89 | 0% |
| 90 and over | 0% |
| Prefer not to say | 7% |

Haringey has a relatively young population with a quarter of the population under the age of 20, and 91% of the population under 65. Of the 585 respondents completing this question 81% were below 65. A nil response was recorded for under the age of 20. This age group is less likely to be either a landlord, home owner or tenant and therefore licensing is unlikely to affect them.

SEX

Q26. Gender (543 respondents completed this question)

| | |
|--------|-----|
| Male | 49% |
| Female | 51% |

The gender split is in line with the borough profile.

GENDER REASSIGNMENT

Q27. Does your gender differ from your birth sex? (548 respondents completed this question)

| | |
|-------------------|-----|
| Yes | 1% |
| No | 90% |
| Prefer not to say | 9% |

1% of respondents confirmed that their gender differs from their birth sex. No data is available for the profile of Haringey.

PREGNANCY AND MATERNITY

Are you pregnant? (259 respondents completed this question)

| | |
|-----|-----|
| Yes | 2% |
| No | 98% |

| | | |
|---|-----|-----|
| Q29. Have you had a baby in the last 12 months? (257 respondents completed this question) | Yes | 2% |
| | No | 98% |

2% of the 259 respondents confirmed that they were pregnant at the time of completing the questionnaire and 2% of the 257 respondents confirmed that they had given birth within the last 12 months. These figures are lower than the overall conception rate among women in England and Wales.

MARRAGE AND CIVIL PARTNERSHIP

Q30. What is your marital status? (559 respondents completed this question)

| | |
|---------------------------------|-----|
| Single | 23% |
| Married | 39% |
| Co-habiting | 16% |
| Separated | 2% |
| In a same sex civil partnership | 1% |
| Divorced | 3% |
| Widowed | 1% |
| Prefer not to say | 14% |

The above responses are broadly in line with the Borough profile, except for the number of respondents confirming as single is lower than the borough profile of 50%

SEXUAL ORIENTATION

Q33. Which of the following best describes your sexual orientation? (548 respondents completed this question)

| | |
|-----------------------|-----|
| Bisexual | 1% |
| Gay/Lesbian | 5% |
| Heterosexual/Straight | 65% |
| Prefer not to say | 29% |

3.2% of London residents aged 16 or over identified themselves as lesbian, gay or bisexual in 2013 (ONS integrated Household Survey) This compares with 6% of the 548 respondents to the consultation questionnaire.

Race and Ethnicity

Q31. Are you...? A refugee 0%

| | |
|----------------------|------|
| An asylum seeker | 0% |
| Neither of the above | 100% |

(547 respondents completed this question) Nil response was received from respondents identifying as either a refugee or asylum seeker.

Q34. What is your ethnic background?

(554 respondents completed this question)

| | |
|--|-----|
| White: British | 55% |
| White: Irish | 4% |
| White Other: Gypsy/Roma | 0% |
| White Other: Greek/Greek Cypriot | 3% |
| White Other: Turkish | 0% |
| White Other: Kurdish | 0% |
| White Other: Irish Traveller | 0% |
| White Other: (please specify) | 10% |
| Mixed: White and Black Caribbean | 0% |
| Mixed: White and Black African | 0% |
| Mixed: White and Asian | 1% |
| Mixed Other (please specify) | 1% |
| Asian: Indian | 2% |
| Asian: Pakistani | 0% |
| Asian: Bangladeshi | 1% |
| Asian: East African Asian | 0% |
| Asian Other (please specify) | 1% |
| Black: African | 1% |
| Black: Caribbean | 2% |
| Black Other (please specify) | 0% |
| Chinese or other ethnic group: Chinese | 0% |
| Any other ethnic background (please specify) | 1% |
| Prefer not to say | 18% |

Ethnic group (452 respondents completed this question)

| | |
|------------------|-----|
| White British | 68% |
| White Other | 20% |
| Mixed | 2% |
| Asian | 4% |
| Black | 4% |
| Chinese or Other | 2% |

The majority of respondents confirming their ethnic background or group, identified as white British/white other. In contrast, the borough profile confirms that 65% of residents identify as non-white British.

DISABILITY

Q36. Do you consider yourself to be a disabled person? (541 respondents completed this question)

| | |
|-----|-----|
| Yes | 6% |
| No | 94% |

14% of residents have a long term health problem or disability in Haringey, compared to 6% of the 541 respondents.

Results of the on-line Consultation

Overall, support for a borough-wide Additional Licensing scheme is strong (70% in support). Opposition to the scheme is highest amongst landlords (39%), whilst residents are most in favour (80%). Around half of all respondents (53%) feel it will have a positive impact on them, with residents again most positive (65% positive), whilst landlords are most negative (34% negative).

Support for a Selective Licensing scheme in parts of Haringey is fairly well supported (57% overall), but less so than an Additional Licensing scheme. PRS tenants are most in favour of the scheme (70%), whilst two thirds of landlords are opposed to it (66%). Six out of ten landlords (61%) feel it will have a negative impact on them, whilst over half of PRS tenants and residents feel it will be positive (54% and 53% respectively).

When respondents were asked to say why they supported licensing, 351 respondents offered comments for Additional Licensing and 282 offered a comment in respect of Selective Licensing. The top three reasons cited below were offered for both schemes:

- Better living conditions/maintained properties
- Reduce the knock on effects like fly tipping, ASB, overcrowding in HMOs etc.
- Offers protection to tenants and holds landlords accountable.

Bridge Renewal Trust – Engagement Event

There was overwhelming support for a licencing scheme by all participants. The top 3 issues identified by all groups as a priority for licensing to address have been categorised and are summarised below

- Improvement in property maintenance and conditions, including overcrowding and safety concerns.
- Lack of available property and high rents.
- Support for tenants to better understand their rights and deal with illegal evictions and complaints against landlords.

| |
|--|
| |
| |

5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?

Please explain the likely differential impact on each of the 9 equality strands, whether positive or negative. Where it is anticipated there will be no impact from the proposal, please outline the evidence that supports this conclusion.

Further information on assessing impact on different groups is contained within accompanying EqlA guidance

1. Sex -

The outcome of licensing is to improve standards within the PRS, and so tenants of any sex are likely to be positively impacted. We can reasonably anticipate benefits for women, as the vast majority of lone parent households in Haringey are headed by women and these households are overrepresented in the private rented sector.

We have no data as to the gender of landlords in Haringey but the proposal will affect any landlord or letting agent equally regardless of their gender and we do not anticipate a disproportionate impact based on this protected characteristic.

| | | | | | | | |
|----------|---|----------|--|----------------|--|----------------|--|
| Positive | X | Negative | | Neutral impact | | Unknown Impact | |
|----------|---|----------|--|----------------|--|----------------|--|

2. Gender reassignment -

We do not have local data regarding the representation of individuals who identify as a gender different to the one they were assigned at birth in the private rented sector. Our consultation findings lead us to believe that there will not be specific impacts for this protected group, but we will ensure that this group will not be subjected to discrimination, harassment and victimisation due to their protected characteristic. If any inequity in treatment is identified we will take steps to rectify this.

| | | | | | | | |
|----------|--|----------|--|----------------|---|----------------|--|
| Positive | | Negative | | Neutral impact | X | Unknown Impact | |
|----------|--|----------|--|----------------|---|----------------|--|

3. Age -

The private rented sector (PRS) is increasingly being used as an alternative to home ownership for young people who cannot afford to get onto the property ladder. We also know that private renting is being used increasingly by families with young children. Additional licensing is targeted at houses in multiple occupation, including properties, which are likely to be shared houses as well as bedsit and studio accommodation, which tend to be a cheaper forms of renting and therefore more accessible to young adults who are more likely to be on low incomes. The impact of this proposal for young people in the private rented sector is going to be positive as it will help ensure that the quality of accommodation they are accessing is good and that the landlord they are renting from is fit and proper..

We have no data as to the age of landlords in Haringey but the proposal will affect any landlord or letting agent equally regardless of their age and we do not anticipate a disproportionate impact based on this protected characteristic

| | | | | | | | |
|----------|---|----------|--|----------------|--|----------------|--|
| Positive | x | Negative | | Neutral impact | | Unknown Impact | |
|----------|---|----------|--|----------------|--|----------------|--|

4. Disability - 14% of Haringey residents have long term health problems that limits their day to day activity, which is lower than England but in line with London. 23% of households in the private rented sector included at least one member who had a long-term illness or disability. It is therefore likely that individuals with disabilities are over-represented among private-rented sector tenants and therefore those impacted by the proposal..

HMO licensing would not be able to take into consideration an individual tenant's disability or needs associated with their disability when applying standards. The effect of licensing overall however would be positive for these households in improving overall housing conditions.

We have no data as to how many landlords in Haringey have disabilities but the proposal will affect any landlord or letting agent equally and we do not anticipate a disproportionate impact based on this protected characteristic.

| | | | | | | | |
|----------|---|----------|--|----------------|--|----------------|--|
| Positive | x | Negative | | Neutral impact | | Unknown Impact | |
|----------|---|----------|--|----------------|--|----------------|--|

5. Race and ethnicity -

We know from the 2011 census that Haringey is the 5th most diverse borough in the country. 65% of residents come from non-white British communities. In summary 45% of the population was born outside of Britain. The main nationalities being Polish, Turkish, Jamaican, Irish, Ghanaian and Somalian.

Individuals and groups from ethnic minority backgrounds are over-represented among private-rented sector tenants. The impact of this proposal, in improving conditions in the private-rented sector, will therefore be positive overall for this protected characteristic.

We have no data as to the ethnicity of landlords in Haringey but the proposal will affect any landlord or letting agent equally regardless of their ethnicity and we do not anticipate a disproportionate impact based on this protected characteristic

| | | | | | | | |
|----------|---|----------|--|----------------|--|----------------|--|
| Positive | X | Negative | | Neutral impact | | Unknown Impact | |
|----------|---|----------|--|----------------|--|----------------|--|

6. Sexual Orientation -.

We do not have local data on the representation of LGBT individuals in private rented sector accommodation. Our consultation findings lead us to believe that there will not be specific impacts for this protected group, but we will ensure that this group will not be subjected to discrimination, harassment and victimisation due to their protected characteristic. If any inequity in treatment is identified we will take steps to rectify this.

| | | | | | | | |
|----------|--|----------|--|----------------|---|----------------|--|
| Positive | | Negative | | Neutral impact | X | Unknown Impact | |
|----------|--|----------|--|----------------|---|----------------|--|

7. Religion or belief (or no belief) -

Haringey is one of the most religiously diverse places in the UK. At the time of the census the most common religion in Haringey was Christianity, accounting for 45% of residents, this is less than London. The next most common faith is Muslim (14.3%) and Jewish (3%). Hindu and Sikh faiths are under-represented in Haringey compared to London. As we know the PRS is the most likely tenure for new communities and will therefore provide housing for a large diverse population it is without question that different faith groups will be represented. Licensing will improve the condition of private rented housing and will therefore have a positive impact for households from religious minorities.

We have no data as to the faith of landlords in Haringey but the proposal will affect any landlord or letting agent equally regardless of their faith and we do not anticipate a disproportionate impact based on this protected characteristic

| | | | | | | | |
|----------|---|----------|--|----------------|--|----------------|--|
| Positive | X | Negative | | Neutral impact | | Unknown Impact | |
|----------|---|----------|--|----------------|--|----------------|--|

8. Pregnancy and maternity -

It is highly likely that due to the age demographics of those living in the PRS and the over-representation of lone parents that pregnancy and maternity is a characteristic that will be impacted on by licensing. The link between poor living accommodation and health is well evidenced, as is the impact of poor standards of accommodation on children's health and development. Licensing will affect positively on both maternity and pregnancy through improving these standards for residents.

| | | | | | | | |
|----------|---|----------|--|----------------|--|----------------|--|
| Positive | X | Negative | | Neutral impact | | Unknown Impact | |
|----------|---|----------|--|----------------|--|----------------|--|

9. Marriage and Civil Partnership -

People who are in a civil partnership will be treated the same as people who are married.

| | | | | | | | |
|----------|--|----------|--|----------------|---|----------------|--|
| Positive | | Negative | | Neutral impact | x | Unknown Impact | |
|----------|--|----------|--|----------------|---|----------------|--|

10. Groups that cross two or more equality strands e.g. young black women -

Groups that are likely to be over-represented among those affected by the proposal include:

- Young women
- Young people from BAME communities
- Young people with disabilities

- Ethnic minority individuals with disabilities
- Ethnic minority individuals from minority faith communities

These groups are all likely to be over-represented in the private rented sector and are therefore all likely to be positively impacted by the proposal's aim to improve conditions in the private rented sector.

Outline the overall impact of the policy for the Public Sector Equality Duty:

- Could the proposal result in any direct/indirect discrimination for any group that shares the protected characteristics?
- Will the proposal help to advance equality of opportunity between groups who share a protected characteristic and those who do not?

This includes:

- a) Remove or minimise disadvantage suffered by persons protected under the Equality Act
 - b) Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups
 - c) Encourage persons protected under the Equality Act to participate in public life or in any other activity in which participation by such persons is disproportionately low
- Will the proposal help to foster good relations between groups who share a protected characteristic and those who do not?

This analysis has concluded that, overall, the extension of HMO licensing is likely to have a positive impact on all tenants and those with protected characteristics in particular. Licensing will have the greatest impact on those who are disadvantaged and who have little or no choice but having to rent in the private sector, including specific groups of tenants who share protected characteristics. .

A key purpose of the scheme is to improve housing conditions and reduce property related antisocial behaviour which will benefit residents across all protected characteristics and particularly more vulnerable groups. In particular, BAME groups, new migrants, families with young children, disabled residents and vulnerable adults will benefit from better enforcement of licence conditions and of the Housing Health and Safety Rating System standards. The proposal will therefore advance equality of opportunity to high quality housing for individuals and groups who share protected characteristics.

We do not anticipate any direct discrimination for any group that shares protected characteristics. The results of the consultation and the Equality Analysis has identified some potential adverse indirect impacts for lower income groups, particularly young people, migrants, single parents, if landlords decide to increase rents as a direct result of licensing. However, based on our existing licensing schemes in Haringey and that of other Councils who have introduced licensing, we believe that this is very unlikely to materialise and so the likelihood of this impact is very low.

There is a risk of homelessness for some residents should landlords decide to withdraw from the private rented sector. Although we think this is unlikely, to mitigate against this

we have minimised the cost of a license, including offering a 50% early bird discount. In addition we will ensure that any monitoring or reporting requirements for landlords are kept to a minimum. Feedback from other councils and experience of our existing licensing schemes suggests that this is unlikely to happen and is therefore a low risk.

The proposal will help to foster good relations between individuals and groups who share protected characteristics and those who do not by driving up standards of accommodation that is likely to be shared by diverse small groups and by reducing property-associated anti-social behaviour that may otherwise worsen relations.

6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?

Further information on responding to identified impacts is contained within accompanying EqlA guidance

| Outcome | Y/N |
|--|-----|
| No major change to the proposal: the EqlA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. <u>If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them.</u> | Y |
| Adjust the proposal: The EqlA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly <u>set out below</u> the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below | N |
| Stop and remove the proposal: the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision. | N |

6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty

| Impact and which protected characteristics are impacted? | Action | Lead officer | Timescale |
|--|---|--------------|---------------------------------------|
| Lack of data held on some protected characteristics. | The Licensing scheme will enable us to collect much needed data on demographics/equalities of people living in, managing and owning private sector dwellings in Haringey. | Lynn Sellar | 5 year timescale from implementation. |
| Increase in rents due to Licensing. (<i>all protected characteristics</i>) | We will minimise the cost to landlords for licensing, including offering an early bird discount of 50%. We will monitor this closely to see if there is any evidence to suggest that rent increases are driven by licensing, rather than market conditions. | Lynn Sellar | 5 year timescale from implementation |
| Increase in the risk of homelessness. (<i>all protected characteristics</i>) | We will endeavour to work with landlord and tenants who may be affected by action in relation to Licensing to try and maintain tenancies and work through any problems identified by using internal and external support services when applicable. | Lynn Sellar | 5 year timescale from implementation |
| Lack of understanding about the scheme/certain terminology. (<i>all protected characteristics</i>) | It is proposed that a comprehensive publicity campaign is launched when the two licensing schemes are introduced. Extra care will be taken to ensure that the information is presented in an easy to understand format. | Lynn Sellar | |

Please outline any areas you have identified where negative impacts will happen as a result of the proposal but it is not possible to mitigate them. Please provide a complete and honest justification on why it is not possible to mitigate them.

None identified.

6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:

As part of the licensing project we are working closely with connected communities officers funded through Migration Impact funding. Part of this project is to look at the impact of private renting on community groups to try and ensure that we shape or mainstream frontline functions to assist dis- advantaged groups.

Licensing also offers the opportunity for officers to visit tenants as part of the licensing inspection programme. For many residents this is the first contact they may have had with council officials. This is an opportunity for officers to identify further needs of tenants/ residents and ensure that they are accessing services and support if required.

7. Authorisation

EqlA approved by David Murray
(Assistant Director)

Date 28th January 2019

8. Publication

Please ensure the completed EqlA is published in accordance with the Council's policy.

Please contact the Policy & Strategy Team for any feedback on the EqlA process.