

London Borough Haringey. Selective Property Licensing

Appendix 7

Equalities Impact Assessment

Equality Impact Assessment (EQIA)

The Equality Impact Assessment (EQIA) form is a template for analysing a policy or proposed decision for its potential effects on residents with protected characteristics covered by the Equality Act 2010.

The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share protected characteristics and people who do not
- Foster good relations between people who share those characteristics and people who do not

The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

Although it is not enforced in legislation as a protected characteristic, Haringey Council recognises the profound and far-reaching impacts of socioeconomic disadvantage treats socioeconomic status as a local protected characteristic.

1. Responsibility for the Equality Impact Assessment

Name of proposal:	Proposal to introduce
Service Area:	Selective Property Licensing
Officer Completing Assessment:	Environment & Neighbourhoods
Equalities/HR Advisor:	Lynn Sellar
Cabinet meeting date (if applicable):	Edward Ashcroft
Director/Assistant Director	22 Feb 2021
	Stephen McDonnell

2. Executive summary

Background

In addition to our normal enforcement powers, Part 3 of the Housing Act 2004 gives Local Authorities the power to designate an area or areas within its district as being subject to selective licensing to target specific issues that are affecting the local authority and its community. Selective licensing is a discretionary licensing tool which can assist a Local Authority in regulating the private letting of houses where there are concerns of at least one of the following issues: anti-social behaviour, low housing demand, poor property conditions, high crime, high levels of deprivation or high migration.

In Haringey, we have seen a significant increase in the size of our Private Rented Sector (PRS) with recent data modelling estimating that the borough has just under 44,000 privately rented dwellings. Alongside this growth, we have found evidence of an increase in the prevalence of poor property conditions and deprivation in areas containing high concentrations of privately rented properties as detailed in Appendix 1.

Proposal

The Council is seeking approval to introduce a selective property licensing scheme for property that is rented to single family households or two unrelated sharers. The scheme designation will include all 12 wards within the East of the borough: Bounds Green, Bruce Grove, Harringay, Noel Park, Northumberland Park, Tottenham Hale, Tottenham Green, Seven Sisters, St Ann's, West Green, White Hart Lane and Woodside. The designation area has been chosen following a comprehensive analysis of the PRS in Haringey with specialist consultant support.

The Scheme seeks to:

- improve housing conditions;
- reduce deprivation and inequalities; and
- contribute to an improvement in the health outcomes of residents in the most deprived areas by improving property conditions and tackling fuel poverty.

Scheme

If the scheme comes into force, landlords within the designation would be legally required to apply to the Council for a license to rent the property. The property would have to meet minimum legal requirements and the licence holder would need to adhere to an agreed set of conditions for the lifetime of the licence scheme. This scheme would last for 5 years.

The proposed licence fee is £600 per property. In accordance with the Housing Act 2004, this fee must be paid by the applicant and be reasonable and proportionate to the cost of the licensing scheme – and shall not exceed the cost of the licensing scheme.

Equalities impact

Primarily, this proposal has the potential to impact residents who are living in the PRS and within the designation area identified - and landlords and letting agents whose properties will be subject to this scheme

It is estimated that 11,771 (26.9%) of properties in the PRS in Haringey are in poor property condition – which is double the national average (13%). As such, it is anticipated that there will be an overall positive equalities impact due to improvements in the standards of housing locally.

It is anticipated that there will be particular positive impacts on the following groups:

- Young people who are disproportionately more likely to experience significant problems whilst renting in the PRS – and who are overrepresented in the designated area;
- Trans and disabled people who are disproportionately likely to face discrimination in the PRS;
- Black, Asian, or Minority Ethnic residents who are disproportionately more likely to experience significant problems whilst renting in the PRS– and who are overrepresented in the designated area;
- Women and households with children who are disproportionately more likely to experience significant problems whilst renting in the PRS.

Consultation summary

The Council ran a 16-week statutory consultation. Overall, most respondents to the consultation were in favour of the proposal. A majority of residents and tenants supported the proposal – with a majority of landlords and letting agents opposing the proposal.

Some concerns were raised about the impact of the proposed licenced fees on landlords and the possibility of costs being passed on to tenants. As the licence fee costs for landlords are nominal when broken down on a weekly basis in comparison to the average market rate for rent, it is unlikely that this will financially impact landlords. Furthermore, scheme discounts will be widely publicised through direct marketing, and partnerships with local community groups, to incentivise greater compliance and reduce the costs incurred by landlords.

A recent report into the effectiveness of selective licensing found no evidence of licence fees being passed onto tenants. Therefore, there is no material risk of the scheme having an adverse financial impact on the Borough's most deprived and vulnerable tenants.

In addition, some concerns were raised by participants about the proposed scheme designation potentially widening inequalities across the borough. The targeted scheme is intended to have the opposite effect by improving living standards in the areas of the borough in most need.

The Council's preference would be to introduce a borough-wide selective licensing scheme to ensure that housing standards across all PRS properties are raised and that all residents are protected. However, Government regulations and guidance for the introduction of selective licensing mandates that local authorities must meet strict criteria before an area can be lawfully introduced. At present, the wards excluded from the scheme do not meet these criteria.

However, these wards will be kept under review and, should future evidence suggest that any of them would qualify for a scheme, we will consider applying for an additional designation. We will also continue to use our existing powers and enforcement policy to deal with reported problems in the wards excluded from the scheme.

Approval

This proposal requires full cabinet approval. As the scheme covers more than 20% of the borough, it requires further authorisation from the Department of Levelling Up, Housing and Communities before it can come into force. As part of the legislation and guidance associated with the scheme, regular monitoring of the scheme is required, alongside evidence that the Council is meeting the scheme objectives.

3. Consultation and engagement

Consultation

The Council ran a statutory consultation for 16 weeks from 17 May to 5 September 2021. This consultation was managed by an independent research company and used a variety of methods to seek feedback from stakeholders on the proposed scheme. These methods included an online survey, a postal survey, remote public workshops, stakeholder interviews, a freephone number for verbal feedback, and an email address for written feedback and queries. Adaptations were also made in light of the ongoing COVID-19 pandemic.

The key stakeholders were:

- tenants;
- landlords/letting agents;
- wider residents;
- internal services; and
- external partners.

The consultation sought to gather local views on the proposals including respondents' experiences of issues in the borough around property conditions, deprivation, and anti-social behaviour. Questions were also asked on the licensing conditions and proposed fee.

The Council promoted the consultation extensively through various communication channels, both within Haringey and beyond, to encourage landlords, tenants, agents, residents, businesses, and other interested parties to get involved.

The consultation was extended by 4 weeks from the original end date of 8 August 2021 to:

- compensate for the impact of COVID-19;
- mitigate for a delay with some of the communications sent to stakeholders; and
- allow for further advertising towards the end of the consultation to encourage greater take up.

In total, the consultation generated 956 survey responses (950 online and 6 postal). 27 people attended three public workshops. Seven stakeholders were interviewed, and 36 individuals or organisations responded with formal written submissions to the consultation.

Survey respondents were asked anonymised questions about their personal characteristics. The majority of respondents were aged between 30-44 years old

(32%). Over a quarter of respondents were aged between 45-59 years old (26%). 14% of respondents were aged 60 or above and 11% were aged 29 or below.

Nearly half of respondents identified as female (43%). Whilst 37% identified as male and 3% stated that they would describe themselves in another way.

Non-disabled people accounted for 70% of respondents and 11% of respondents reported that they lived with disabilities.

Respondents who identified as White British were the largest ethnic group (43%), followed by those who identified as White Other (22%), Black (6%), Mixed (4%) and Asian (3%). 20% of respondents preferred not to state their ethnicity.

A full breakdown of the demographic profile of respondents can be found in the [consultation report, pages 65-67](#).

Findings

Overall response

In summary, the selective licensing scheme proposal was supported by over half of the respondents who took part in the survey (56%). Around a third disagreed with the proposal (34%). Notably:

- around two thirds of residents and private tenants were supportive of the proposal (67% each)
- the majority of landlords and agents disagreed with the proposal (79%).
- 69% of all other respondents were also supportive of the proposal.

Impact on the local area

58% of respondents felt that the scheme would have a positive impact on the proposed area. Around half of all respondents (46%) felt the proposed scheme would have a positive impact on other nearby areas, and 43% felt the proposed scheme would have a positive impact on themselves and/or their business or organisation (43%).

Residents, private tenants and all other respondents were generally positive across the board, whilst landlords and agents were negative across the board, feeling that it would have either a negative impact or no impact.

Wider impact of the scheme

When asked about whether the proposed licensing conditions would help improve the quality of the neighbourhood, property safety and standards, and management standards, support was positive overall (with between 62% and 67% agreeing), although around a quarter (24-27%) disagreed. Support was stronger amongst other respondents (between 81% - 86% agreed, as well as residents and private tenants (at least seven in ten agreed). Most landlords and agents disagreed (59%-64%).

Level of license fee

Over half of respondents (51%) supported the level of licence fee, whilst four in ten disagreed (40%). Similarly, over half (51%) agreed that the proposed discounts on the licence fee were reasonable, with a lower proportion responding that they were unreasonable (24%). Again, support was stronger amongst residents, private tenants and other respondents, regarding the fee and proposed discounts, and weaker amongst landlords and agents.

Some tenants were concerned that licence fee costs may be passed on to them via their rent. However, there is no evidence of this from other local authorities who have administered similar schemes. Enfield, Hackney and Waltham Forest all have licensing schemes, and the Council has a similar scheme in place for property rented to multiple tenants.

Over a five-year period, the cost of the proposed licence fee works out to £2.31 per week. The median monthly private rent in Haringey is £1,500¹. This was previously £70 less than the London average but is now £65 above it. The mean private rent is now £1,644 a week. This has increased by 17.4% in the last 4 years, a higher rate than local authority rents (5.5%) and London private rent (10.3%) It is therefore anticipated that the set fee will be affordable for most landlords.

4. Data and Impact Analysis

Please consider how the proposed change will affect people with protected characteristics

4a. Age

Data

Borough Profile 2

56,718: 0-17 (21%)
72,807: 18-34 (27%)
68,257: 35-49 (25%)
44,807: 50-64 (17%)
28,632: 65+ (11%)

Target Population Profile

We do not hold any local data on the representation of those with protected characteristics living in or letting properties in the PRS in Haringey.

However, we know from the ONS Mid-Year Population Estimates 2018 that those aged 20-44 are overrepresented in the following wards included in our designation area in comparison to the Haringey average of 42.5%: Harringay (54.3%), St Ann's (49.9%), Woodside (47.8%), Noel Park (47.3%) and Tottenham Green (44.8%).

Those aged 65+ are under-represented in most of our designation area wards (covering the East side of the borough) compared to the rest of Haringey.

¹ 12 month rolling period to Q2 2020-21

² Source: State of the Borough

Data sources

- i. [Ward profiles](#)
- ii. [English Private Landlord Survey 2018, Ministry of Housing, Communities and Local Government \(Figure 1.3: Landlords by age\)](#)
- iii. [Internet access – households and individuals, Great Britain: 2020, Office for National Statistics](#)
- iv. [UK private rented sector: 2018, Office for National Statistics](#)
- v. [A time for change: making renting fairer for private renters, Shelter \(November 2020\)](#)

Findings

The Annual Population Survey 2017 found that younger households are more likely to rent privately than older households; with those in the 25 to 34 years age group representing the largest group (35%). A recent report by the housing charity, Shelter, found that young renters are disproportionately more likely to experience significant problems whilst renting in the PRS.

Given that those aged 20-44 are overrepresented in nearly half of the wards included in our designation area compared to the wider demographic profile of the borough, the proposed selective licensing scheme is likely to disproportionately affect younger households. Furthermore, there is a higher likelihood that many of these young renters will be experiencing problems with their housing.

The English Private Landlord Survey 2018 found that landlords are, on average older than the general population, 57 years old. This is 18 years older than the median age for the population of England and Wales as per the 2011 Census. Over half (59%) of landlords are aged 55 or older, representing 62% of tenancies in England and Wales.

We know from the latest Office of National Statistics data release on internet access in Great Britain that households with one adult aged 65 years and above have the lowest proportion of internet connections. Assuming that the aforementioned patterns are replicated in Haringey, there may be some older landlords operating in the borough without internet access or limited computer literacy.

Impacts

It is estimated that 11,771 (26.9%) of properties in the PRS in Haringey are in poor property condition, this is double the national average (13%). Problems often go unreported as tenants fear the possibility of a retaliatory 'no fault' eviction. Under selective licensing, renters will have greater protections as landlords will have to oblige with the scheme's set licence conditions or risk enforcement action. Furthermore, the Council will no longer be required to give landlords 24 hours' notice prior to an inspection. This will reduce the likelihood of tenants facing retribution for reporting their concerns. Therefore, the overall impact of the proposed scheme will be positive for all age groups renting privately in the borough, with young renters set to benefit the most as they make up the highest proportion of private renters.

In terms of accessibility, alternative means of applying for a licence will be offered for older landlords operating in the borough without internet access or limited computer literacy. Therefore, there will be no negative impact on this group.

4b. Disability

Data

Borough Profile 3

4,500 people have a serious physical disability in Haringey.

19,500 aged 16-64 have a physical disability this equates to approximately 10% of the population aged 16-64.

1,090 people living with a learning disability in Haringey.

4,400 people have been diagnosed with severe mental illness in Haringey.

Target Population Profile

We do not hold any local data on the representation of those with protected characteristics living in or letting properties in the PRS in Haringey and we are unable to locate a comparable breakdown of the disability profile of the general population in our proposed designation area.

Data sources

- i. [State of the Borough](#)
- ii. [Disability and housing, UK: 2019: Office of National Statistics](#)

Findings

In the 2011 Census, 23% of households in the Borough had one identified person with a long-term health problem or disability. This is similar to the London average (22%).

We know from the 2019 Annual Population Survey that disabled people are only slightly less likely to live in private rented accommodation than their non-disabled counterparts. On this basis, it is unlikely that those with disabilities are overrepresented in our proposed designation area.

Impacts

Residents

Should the scheme go ahead, landlords will be required to obtain a licence to legally let their property in the proposed designation area. Licence holders will be obliged to comply with the set licence conditions, which in turn will help to raise property standards across the East side of the borough. Poor housing conditions have a negative impact on tenant's health and exacerbate existing health issues. An improvement in housing conditions will therefore have a positive impact on those with disabilities and more complex health needs.

3 Source: 2011 Census

Fit and proper persons tests will also be conducted prior to granting licences. Prospective applicants will be required to declare '*Details of any finding by a court or tribunal against the licence holder and/or the manager that they have practiced unlawful discrimination on the grounds of sex, colour, race, ethnic or national origin or disability*'. This will provide greater protection to those with disabilities by reducing the number of landlords operating in the Borough with a history of unlawful discrimination.

Landlords

An online form will be used as our principal method of applying for a licence. Where necessary, reasonable adjustments will be made for applicants with accessibility needs. Furthermore, we will ensure that all resources in relation to the scheme are fully accessible, including reporting. Therefore, we do not anticipate any negative impacts on landlords with disabilities.

4c. Gender Reassignment 4

Data

Borough Profile

There is no robust data at Borough level on our Trans population, however the central government estimates that there are approximately 200,000-500,000 Trans people in the UK. Assuming an average representation, this would mean between 800 and 2000 Haringey residents are Trans.⁵

Target Population Profile

We do not hold any local data on the representation of those with protected characteristics living in or letting properties in the PRS in Haringey and we do not hold any data on the Trans population in our proposed designation area.

Data sources

- i. [LGBT in Britain – Trans Report 2018: Stonewall](#)

Findings

Due to the absence of local and national data, we are unable to confirm whether Trans people are overrepresented in our proposed designation area. It is not anticipated that they are disproportionately represented in this area.

Impacts

⁴ Under the legal definition, a transgender person has the protected characteristic of gender reassignment if they are undergoing, have undergone, or are proposing to undergo gender reassignment. To be protected from gender reassignment discrimination, an individual does not need to have undergone any specific treatment or surgery to change from one's birth sex to one's preferred gender. This is because changing one's physiological or other gender attributes is a personal process rather than a medical one.

⁵ Trans is an umbrella term to describe people whose gender is not the same as, or does not sit comfortably with, the sex they were assigned at birth.

A recent study by Stonewall Housing investigating the specific experiences of Trans people in Britain found that one in four trans people (25%) were discriminated against when looking for a house or flat to rent or buy in the last year. In addition, the report found that one in five non-binary people (20%) had also experienced discrimination whilst looking for a new home.

Fit and proper persons tests will be conducted prior to granting licences. Prospective applicants will be required to declare '*Details of any finding by a court or tribunal against the licence holder and/or the manager that they have practiced unlawful discrimination on the grounds of sex, colour, race, ethnic or national origin or disability*'. This will provide greater protection to trans tenants by reducing the number of landlords operating in the Borough with a history of unlawful discrimination.

4d. Marriage and Civil Partnership

Data

Borough Profile 6

Divorced or formerly in a same-sex civil partnership which is now legally dissolved: (8.2%)

In a registered same-sex civil partnership: (0.6%)

Married: (33.3%)

Separated (but still legally married or still legally in a same-sex civil partnership): (4.0%)

Single (never married or never registered a same-sex civil partnership): (50.0%)

Widowed or surviving partner from a same-sex civil partnership: (3.9%)

Target Population Profile

We do not hold any local data on the representation of those with protected characteristics living in or letting properties in the PRS in Haringey and we are unable to locate a comparable breakdown of the marriage and civil partnership status of the general population in our proposed designation area.

Data sources

- i. [LGBT in Britain – Hate Crime and Discrimination Report 2017: Stonewall](#)

Findings

Due to the absence of local and national data, we are unable to confirm whether those in same sex civil partnerships are overrepresented in our proposed designation area. However, we do not anticipate that they are disproportionately represented in this area.

Impacts

6 Source: 2011 Census

A recent study by Stonewall Housing investigating the specific experiences of LGBT people in Britain found that one in ten LGBT people (10 per cent) who were looking for a house or flat to rent or buy in the last year were discriminated against because of their sexual orientation and/or gender identity.

Fit and proper persons tests will be conducted prior to granting licences. Prospective applicants will be required to declare '*Details of any finding by a court or tribunal against the licence holder and/or the manager that they have practiced unlawful discrimination on the grounds of sex, colour, race, ethnic or national origin or disability*'.

We intend to expand this clause to cover all the protected characteristics, including marriage and civil partnership. This will provide greater protection to queer tenants in same sex civil partnerships by reducing the number of landlords operating in the Borough with a history of unlawful discrimination.

4e. Pregnancy and Maternity

Data

Borough Profile 7

Live Births in Haringey 2019: 3646

Target Population Profile

We do not hold any local data on the representation of those with protected characteristics living in or letting properties in the PRS in Haringey and we are unable to locate a comparable breakdown of live births in our proposed designation area.

Data sources

- i. [A time for change: making renting fairer for private renters, Shelter \(November 2020\)](#)

Findings

In a recent report by the housing charity, Shelter, people with children in the household were identified as one of the UK's worst hit groups of renters that were disproportionately more likely to encounter the most/worst problems when privately renting.

Impacts

Given that people with children are disproportionately likely to face challenges when privately renting, this group stands to benefit from the proposed changes.

Furthermore, selective licensing will provide expectant and new mothers with greater protection from retaliatory 'no fault' evictions, as the Council will no longer be required to give landlords 24 hours' notice prior to an inspection. This should encourage more people to report any difficulties they are facing without fear of retribution.

7 Births by Borough (ONS)

4f. Race

Data

Borough Profile 8

Arab: **0.9%**

Any other ethnic group: 3.9%

Asian: **9.5%**

Bangladeshi: 1.7%

Chinese: 1.5%

Indian: 2.3%

Pakistani: 0.8%

Other Asian: 3.2%

Black: **18.7%**

African: 9.0%

Caribbean: 7.1%

Other Black: 2.6%

Mixed: **6.5%**

White and Asian: 1.5%

White and Black African: 1.0%

White and Black Caribbean: 1.9%

Other Mixed: 2.1%

White: **60.5% in total**

English/Welsh/Scottish/Norther Irish/British: 34.7%

Irish: 2.7%

Gypsy or Irish Traveller: 0.1%

Other White: 23%

Target Population Profile

We do not hold any local data on the representation of those with protected characteristics living in or letting properties in the PRS in Haringey.

However, we know from the 2011 Census that those of Black ethnicity are overrepresented in the following wards included in our proposed designation area in comparison to the Haringey average of 18.8%: Bruce Grove (31.9%), White Hart Lane (28.3%), Tottenham Hale (32.7%), Tottenham Green (28.8%) and Northumberland Park (40.3%).

Those of White Other ethnicity are overrepresented in the following wards included in our proposed designation area in comparison to the Haringey average of 25.9%:

8 Source: 2011 Census

Woodside (33.5%), St Ann's (31.2%), Seven Sisters (29.9%), Tottenham Green (27.9%) Noel Park (approx. 30%), Haringay (31.7%) and Bounds Green (30.5%).

Data sources

- i. [Ward profiles](#)
- ii. [English Private Landlord Survey 2018, Ministry of Housing, Communities and Local Government \(Figure 1.3: Landlords by age\)](#)
- iii. [A time for change: making renting fairer for private renters, Shelter \(November 2020\)](#)
- iv. [Selective licensing consultation report \(December 2021\)](#)

Findings

Black and White Other people are overrepresented in our proposed designation area.

In a recent report by the housing charity, Shelter, people from a Black, Asian and Minority Ethnic background were identified as one of the UK's worst hit groups of renters that were disproportionately more likely to encounter the most/worst problems when privately renting.

Shelter's research also found that some local authorities were using selective licensing as a tool for immigration enforcement by working with border authorities to carry out raids on tenants whose immigration status was unclear. Immigration raids are controversial, with many migrant welfare and human rights charities advocating against them. Concerns about the risks to migrant communities should licensing be used as a form of immigration enforcement, were echoed by some of our partner community organisations interviewed as part of our public consultation.

In addition, partners emphasised the need for a proactive enforcement approach to engage with minority ethnic groups, as the current reactive enforcement approach was struggling to reach these groups.

We do not hold any data on the ethnicity of landlords operating in Haringey. However, we know from the English Private Landlord Survey 2018 that the majority (89%) of landlords are White. This is less ethnically diverse than the general population. At the time of the 2011 Census, 86% of the population identified as White.

Impacts

Given that residents from Black, Asian and Minority Ethnic backgrounds are overrepresented in the designated area and are disproportionately likely to face significant challenges in the PRS, it is anticipated that there will be a positive equalities impact for this protected characteristic. Licensing will provide greater protections for these tenants by reducing the fear of retaliatory 'no fault' evictions and helping to remove landlords with a record of discriminatory practices. Furthermore, improved property conditions will help to close the gap on the existing health inequalities faced by ethnic minority groups.

In order to maximise the benefits of licensing for ethnic minority groups, we will need to retain their trust so that they feel safe to raise any problems they are experiencing with the Council. We will therefore seek to avoid joint visits with border authorities, with the exception of when we are legally required to do so. We have been very clear in our scheme objectives that the purpose of the proposed scheme is to help to tackle deprivation and drive-up property standards and we intend to honour this.

4g. Religion or belief

Data

Borough Profile ⁹

Christian: 45%

Buddhist: 1.1%

Hindu: 1.9%

Jewish: 3%

Muslim: 14.2%

No religion: 25.2%

Other religion: 0.5%

Religion not stated: 8.9%

Sikh: 0.3%

Target Population Profile

We do not hold any local data on the representation of those with protected characteristics living in or letting properties in the PRS in Haringey.

However, we know from the 2011 Census that Muslim residents are overrepresented in the following wards included in our proposed designation area in comparison to the Haringey average of 14.2%: Noel Park (19.1%), Northumberland Park (24.2%), Tottenham Hale (20.3%), St Ann's (17.1%), West Green (21.2%), White Hart Lane (23.9%) and Woodside (17%).

We also know that Jewish residents are overrepresented in Seven Sisters (18.1%) compared to Haringey more widely.

Data sources

- i. [Ward profiles](#)

Findings

Muslim and Jewish residents are overrepresented in our proposed designation area.

Impacts

⁹ Source: 2011 Census

Given that residents from some religious backgrounds are overrepresented in the proposed designated area, they may be disproportionately likely to benefit from the proposals set out here.

4h. Sex

Data

Borough profile 10

Females: (50.5%)

Males: (49.5%)

Target Population Profile

We do not hold any local data on the representation of those with protected characteristics living in or letting properties in the PRS in Haringey and we are unable to locate a comparable breakdown of the sex of the general population in our proposed designation area.

Data sources

- i. [A time for change: making renting fairer for private renters, Shelter \(November 2020\)](#)

Findings

Due to a lack of local data, we are unable to confirm whether women are overrepresented in our proposed designation area. However, as they are overrepresented on the housing register, we believe that there is an increased likelihood of a higher number of women renting privately than men.

In a recent report by the housing charity, Shelter, women were identified as one of the UK's worst hit groups of renters that were disproportionately more likely to encounter the most/worst problems when privately renting.

Impacts

Given that women are disproportionately likely to face challenges when privately renting, this group stands to benefit from the proposed changes. This includes but not limited to: better property conditions, reduced fear of retaliatory 'no fault' evictions and greater protection from landlords with a record of unlawful discrimination.

4i. Sexual Orientation

Data

Borough profile 11

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

Target Population Profile

10 Source: 2011 Census

11 Source: ONS Integrated Household Survey

We do not hold any local data on the representation of those with protected characteristics living in or letting properties in the PRS in Haringey and we are unable to locate a comparable breakdown of the sexual orientation of the general population in our proposed designation area.

Data sources

- i. [LGBT in Britain – Hate Crime and Discrimination Report 2017: Stonewall](#)

Findings

Due to the absence of local and national data, we are unable to confirm whether LGBT people are overrepresented in our proposed designation area. However, we do not anticipate that they are disproportionately represented in this area

Impacts

A recent study by Stonewall Housing investigating the specific experiences of LGBT people in Britain found that one in ten LGBT people (10 per cent) who were looking for a house or flat to rent or buy in the last year were discriminated against because of their sexual orientation and/or gender identity.

Fit and proper persons tests will be conducted prior to granting licences. Prospective applicants will be required to declare 'Details of any finding by a court or tribunal against the licence holder and/or the manager that they have practiced unlawful discrimination on the grounds of sex, colour, race, ethnic or national origin or disability'. We intend to expand this clause to cover all the protected characteristics, including sexual orientation. This will provide greater protection to queer tenants by reducing the number of landlords operating in the Borough with a history of unlawful discrimination.

4j. Socioeconomic Status (local)

Data

Borough profile

Income ¹²

Haringey is the 4th most deprived in London as measured by the IMD score 2019 (where 1 = most deprived). The most deprived LSOAs (Lower Super Output Areas or small neighbourhood areas) are more heavily concentrated in the east of the borough.

22.4% of the population in Haringey aged 16-65 receive Universal Credit as of March 2021.

29% of employee jobs in the borough are paid less than the London Living Wage.

The average wage of someone working in Haringey is £30,452 per year and the average resident wage (including people who travel out of the borough for work) is £35,769 per year.

¹² Source: Annual Survey of Hours and Earnings, ONS, 2019

Educational Attainment¹³

While Haringey's proportion of students attaining grade 5 or above in English and Mathematics GCSEs is higher than the national average, it performs worse than London.

5.5% of Haringey residents have no qualifications.

Target Population Profile

We do not hold any local data on the socio-economic status of those living in or letting properties in the PRS in Haringey.

However, we know from the DWP/MYE Claimant Count December 2019 that the number of residents who claim benefit principally for unemployment is substantially above the Haringey level (251.8 claimants per 10,000 residents) in half of the wards included in our designation area. This includes Northumberland Park which has the highest claimant count in the borough (442.6 claimants per 10,000 residents).

According to the GLA Household Income for Small Areas 2012/13, the median household income in eleven of the twelve wards included in our designation area is below both the Haringey and London averages (£37,696 a year and £39,264 a year respectively). This includes the four wards within the borough with the lowest median household incomes: Tottenham Green (£28,920 a year), Tottenham Hale (£27,340), White Hart Lane (£27,010) and Northumberland Park (£25,090).

As for educational attainment, DfE 2018/19 data on Key Stage 4 performance found that in three quarters of the wards included in our designation area the proportion of pupils attaining a grade 4 or above in English and Maths was below both the Haringey and London averages (65.1% and 68.8% respectively). This included the three poorest performing wards in the borough: West Green (51.6%), Bruce Grove (50.9%) and Tottenham Green (44.3%).

Data sources

- i. [Ward profiles](#)
- ii. [A time for change: making renting fairer for private renters, Shelter \(November 2020\)](#)
- iii. [Annual Fuel Poverty Statistics Report, 2021, Department for Business, Energy and Industrial Strategy \(Figure 3.14\)](#)
- iv. [An Independent Review of the Use and Effectiveness of Selective Licensing, MCHLG \(June 2019\)](#)

Findings

We have chosen deprivation as a criterion to introduce selective licensing due to the demonstrable poorer outcomes for those living in the East side of the borough. People living within our proposed designation area are more likely to have a lower household income, claim universal credit for unemployment or have poor educational outcomes.

¹³ Source: Annual Population Survey 2019 (via nomis)

In a recent report by the housing charity, Shelter, the following socio-economic groups were identified as some of the UK's worst hit renters that were disproportionately more likely to encounter the most/worst problems when privately renting:

- people on the lowest household incomes;
- people claiming Housing Benefit; and
- people who are not working, but not retired (students, unemployed and other working age people who are not employed, such as unpaid carers).

We also know from the 2021 Annual Fuel Poverty Statistics Report that the PRS has the highest level of fuel poverty with 26.8 per cent of these households being fuel poor.

Impacts

By raising property standards across the PRS in our proposed designation area, selective licensing will have an overall positive impact on tackling the socio-economic inequalities observed on the East side of the Borough. We know that housing and mental health are closely linked. Therefore, the anticipated improvements to property conditions are highly likely to have a positive impact on the mental wellbeing of the Borough's most deprived and vulnerable tenants.

Deprived and vulnerable tenants will also have greater protection from retaliatory 'no fault' evictions, as the Council will no longer be required to give landlords 24 hours' notice prior to an inspection. This should encourage more people to report any difficulties they are facing without fear of retribution.

As part of our wider strategy to improve property conditions, we will also be working in conjunction with the affordable energy team to encourage landlords to improve the energy efficiency ratings of their properties. Again, this will have a positive impact on the most deprived households within our proposed designation.

During our public consultation, some concerns were raised by participants about the proposed scheme designation potentially widening inequalities across the borough. As explained above, the targeted scheme is intended to have the opposite effect by improving living standards in the areas of the borough in most need.

The wards excluded from the scheme will be kept under review and, should future evidence suggest that any of them would qualify for a scheme, we will consider applying for an additional designation. We will also continue to use our existing powers and enforcement policy to deal with reported problems in the wards excluded from the scheme.

Concerns were also raised about the impact of the proposed licenced fees on landlords and the possibility of costs being passed on to tenants. As the licence fee costs for landlords are nominal when broken down on a weekly basis in comparison to the average market rate for rent, it is unlikely that this will financially impact landlords. Furthermore, scheme discounts will be widely publicised through direct marketing, and partnerships with local community groups, to incentivise greater compliance and reduce the costs incurred by landlords.

A recent report into the effectiveness of selective licensing found no evidence of licence fees being passed onto tenants. Therefore, there is no material risk of the scheme having an adverse financial impact on the Borough's most deprived and vulnerable tenants.

5. Key Impacts Summary

5a. Outline the key findings of your data analysis.

The analysis of different protected characteristics suggests that there will be a positive overall equalities impact, with a particular potential positive impact on the following groups:

- Young people who are disproportionately more likely to experience significant problems whilst renting in the PRS – and who are overrepresented in the designated area;
- Trans and disabled people who are disproportionately likely to face discrimination in the PRS;
- Black, Asian, or Minority Ethnic residents who are disproportionately more likely to experience significant problems whilst renting in the PRS – and who are overrepresented in the designated area; and
- Women and households with children who are disproportionately more likely to experience significant problems whilst renting in the PRS.

5b. Intersectionality

It is recognised that a number of residents in the PRS are likely to have more than one protected characteristic – for example, Black Women or people with disabilities who are LGBT.

It is anticipated that the overall impact of this proposal will be positive by driving up the local quality of housing and reducing discrimination. Therefore, it is anticipated that this proposal will have a positive impact on those who have multiple protected characteristics.

5c. Data Gaps

We undertook a borough-wide consultation which was open to anyone wishing to participate. Private sector landlords and tenants were specifically targeted, and we engaged with local community groups to help promote the consultation.

As we do not hold specific data on those living in or letting properties in the PRS, we have been unable to specifically target our consultation at any one protected group.

However, we do not believe this data gap compromises the effectiveness of our proposal, as it seeks to drive up standards for all privately rented properties within our proposed designation area.

6. Overall impact of the policy for the Public Sector Equality Duty **Summarise the key implications of the decision for people with protected characteristics.**

We do not believe that this proposal will result in any direct/indirect discrimination for any group with protected characteristics.

As previously stated, the aim of the proposal is to drive up standards for all privately rented properties within our proposed designation area and licensing will be a legal requirement for any landlord/letting agent letting property in the area.

By virtue of the scheme operating within all 12 wards on the East side of the Borough, which all suffer from high levels of deprivation, selective licensing will help to bridge inequalities faced across the borough. Furthermore, improved property management is likely to result in better community relations.

7. Amendments and mitigations

7a. What changes, if any, do you plan to make to your proposal because of the Equality Impact Assessment?

No major change to the proposal: the EQIA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken.

7b. What specific actions do you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty?

We have not found any evidence of any potential negative impacts on any of the protected groups as a result of our proposal.

8. Ongoing monitoring

Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented.

Date of EQIA monitoring review: Interim annual reporting from the go live date.

In accordance with Section 84 of the Housing Act, we will periodically review the operation of our designation to ensure it is achieving the desired effect and, if deemed appropriate to do so, we will consider revoking the designation. Reporting will be led by the Private Sector Housing Team Manager and conducted on an annual interim basis for the five-year duration of the proposed scheme to ensure appropriate accountability and track the scheme's progress. This will include progress against the set objectives, alongside the reporting of key metrics (number of licences issued, average time between application and granting of a licence, number of unlicensed properties identified etc.). Any adverse or unforeseen equalities impacts will also be considered at this time.

A robust evidence base for the effectiveness of the scheme will be imperative to the success of any further applications to the Department of Levelling Up, Housing and

Communities to renew the scheme. We will also be required to run another public consultation to seek the views of relevant groups and our local communities on any such proposal. The Secretary of State will only confirm a renewal if they are satisfied there is a continuing need for the scheme and the consultation and other requisite processes have been followed accordingly.

8. Authorisation

EQIA approved by (Assistant Director/ Director)

[Type answer here].

Date

[Type answer here].

9. Publication

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

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