

Proposed Additional HMO Licensing Consultation

Appendix 4

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 individuals 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 treats socioeconomic status as a local protected characteristic.

1. Responsibility for the Equality Impact Assessment

Name of proposal:	To undertake statutory consultation on proposal to introduce new additional HMO licensing scheme.
Service Area:	Stronger Safer Communities
Officer Completing Assessment:	Lynn Sellar
Equalities Advisor:	Elliott Sinnhuber
Cabinet meeting date (if applicable):	12th September 2023
Director/Assistant Director	Barry Francis, Director
	Environment & resident experience.

2. Executive summary

Please complete this section *after* completing the rest of the form and summarise:

- The policy proposal, its aims and objectives, the decision in consideration. Please focus on **the change** that will result from this decision.
- Results of the analysis: potential positive and negative equality impacts
- Mitigations that will be taken to minimise negative equality impacts (if relevant)
- Next steps (this may include: if/when the EQIA will be refreshed, planned consultation, future stages of the project).

Background

In addition to our normal enforcement powers, Part 2 of the Housing Act 2004 gives Local Authorities the power to designate an area or areas within its district as being subject to additional licensing for Houses in Multiple Occupation (HMO). Additional HMO licensing is a discretionary licensing tool which can assist a Local Authority in regulating the private letting of HMO accommodation which are not covered by the existing Mandatory HMO Licensing requirements.

In 2019 the Council approved an Additional HMO licensing scheme for the whole of Haringey borough. The existing additional HMO Licensing scheme will be due to expire on 26th May 2024. We are currently seeking approval to undertake statutory consultation for the designation of a new scheme following the expiry of the exiting scheme next year.

Our Proposal

The Council is seeking approval to consult on the proposal to introduce a new additional HMO licensing scheme for houses in multiple occupation. The scheme designation will include all 19 wards within the borough.

The scheme

Landlords within the designation would be legally required to apply to the Council for a license to rent the property as an HMO. 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. All licensed property is inspected to ensure it meets legal and property condition standards.

The proposed licence fee is £1210 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.

The reasons for the need to continue with a large-scale HMO licensing scheme in Haringey are.

- Evidence of non-compliance within this sector following outcomes from the existing HMO licensing scheme.
- Learning from the existing scheme about what landlord and tenants require support with and
- Further ambitions to provide greater improvements in the private rented sector.

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 complaint 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.

Equalities impact

Primarily, this proposal has the potential to impact on all residents who live in the borough, landlords and letting agents whose properties will be subject to this scheme.

There are currently 4830 licensed HMO in Haringey, and it is predicted that the borough has a greater number of unlicensed HMO within it. We know from the existing scheme that of those known HMO, 23% failed on basic fires safety at the point of application.

As such, it is anticipated that there will be an overall positive equalities impact on residents through this scheme 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.**
- BME and other white Ethnic residents are likely to benefit as a protected group that are likely to make up a large proportion of our private rented sector. We also know that this group are often disproportionately more likely to experience significant problems whilst renting in the PRS.**
- Women and households with children who are disproportionately more likely to experience significant problems whilst renting in the PRS.**

Next steps

If approved by cabinet public consultation will take place and a final proposal put to cabinet regarding the HMO Licensing scheme designation.

3. Consultation and engagement

3a. 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? Detail how your approach will facilitate the inclusion of protected groups likely to be impacted by the decision.

3b. 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. The proposed consultation will run for a minimum 10-week period.

The consultation will use a variety of consultation techniques to engage with Haringey residents, the wider community, local business, landlords letting agents and our borough partners.

The consultation will use a range of consultation tools to engage including.

- Online Resident Survey.**
Accessibility will be considered, and paper surveys will be made available for those who need them. There will also be a telephone helpline for stakeholder taking part or who need help completing the survey.
- Digital media.**
Facebook, twitter, CAN digital, Snap survey's, Web Pages.
- Publicity campaign.**

Advertising the consultation widely will be key to its success.

- Focus groups and workshops both in person and online.
Likely to be ran by a third party to ensure impartiality.

Translation services will be made available and communication with internal and external agencies to facilitate with the consultation will be sought.

Consultation will be monitored for resident take up so we can refocus the engagement to target groups that may not be responding as well as others.

The results of the consultation have to be made available along with a review of the outcomes. Anyone wishing to be individually informed of the consultation outcomes will be notified as part of the consultation process.

4. Data and Impact Analysis

Note: officers may want to complement their analysis with data from the State of the Borough and ward profiles, found here: <https://www.haringey.gov.uk/local-democracy/about-council/state-of-the-borough>.

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

4a. Age

Data

Borough Profile¹

54,422: 0-17 (21%)

71,660: 18-34 (27%)

63,930: 35-49 (24%)

46,516: 50-64 (18%)

27,706: 65+ (10%)

Target Population Profile

0-17 (21%)

18-34 (27%)

35-49 (24%)

50-64 (%)

65+ (18%)

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

- State of the Borough - April 2023**
- English Private Landlord Survey 2021: main report - GOV.UK (www.gov.uk)**
- Population and household estimates, England and Wales - Office for National Statistics (ons.gov.uk)**

Detail the findings of the data.

¹ State of the borough, Pg. 13, People: Population Structure - [State of the Borough - April 2023](#)

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal as a result of a need related to their protected characteristic?

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

Office for national statistic census data 2021 reported that younger households are more likely to rent privately than older households; in 2017 those in the 25 to 34 years age group represented the largest group (35%).

Households in the private rented sector are getting older; between 2007 and 2017, the proportion of household reference persons (HRP) aged 45 to 54 increased from 11% to 16% while those aged 16 to 24 dropped from 17% to 12%.

The average Haringey ward population is aged between 18-64 years making up 66.9% residents living across the borough.

The English Private Landlord Survey 2021 found that the median age of an individual landlord was 58 years old. This is older than the general population. Almost two thirds (63%) were aged 55 or over, representing 68% of tenancies.

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.

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

This scheme is intended to improve the quality and management of accommodation so is largely focussed on those who live in private rented accommodation. The scheme however will also impact on those residents living in the vicinity of private rented accommodation, especially those who are affected by poorly managed HMO property. Landlord and letting agents are a stake holder who will also be impacted by this scheme. As the main group to be using the processes associated with HMO Licensing, they will be outside tenants our largest targeted population. The outcome of this policy decision is to have a positive impact for this group across all ages.

4b. Disability

Data

Borough Profile

- Disabled under Equality Act – 13.7%²

² Census 2021 - [Disability, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/disabilityandlongtermhealth/bulletins/disabilityinenglandandwales/2021)

- Day to day activities limited a lot – 6.1%
- Day to day activities limited a little – 7.5%
- 7.5% of residents people diagnosed with depression³
- 1.7% of residents diagnosed with a severe mental illness⁴
- 0.4% of people in Haringey have a learning disability⁵

Target Population Profile

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

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

- I. State of the Borough
- II. Disability, England and Wales - Office for National Statistics (ons.gov.uk)

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

Outcomes from the census 2021 identified the following with regards to someone disability and their housing status.

- **For both disabled and non-disabled people, the proportion of homeowners increased by age group. However, the proportion of homeowners increased more rapidly for non-disabled than disabled people up to age 40 to 44 years.**
- **Across all age groups (25 to 64 years), disabled people were less likely to own their own home. The greatest disparity between disabled and non-disabled people owning their own homes was seen for the 40 to 44 years age group, where 69.2% of non-disabled people owned their home compared with 44.2% of disabled people, a difference of 25 percentage points.**
- **Disabled and non-disabled people showed similar proportions of private renting within each age group. Up to the peak within the 25 to 29 years and 30 to 34 years age bands, the proportion of both disabled and non-disabled people private renting increased as the age groups increased.**

³ State of the borough, Pg. 23, People: Mental Health - [State of the Borough - April 2023](#)

⁴ State of the borough, Pg. 23, People: Mental Health - [State of the Borough - April 2023](#)

⁵ PHE Learning disability profiles - <https://fingertips.phe.org.uk/learning-disabilities#page/0/gid/1938132702/pat/6/par/E12000007/ati/102/are/E09000014>

- The proportions of disabled people who were private renters was 27.0% aged 25 to 29 years, and 28.6% aged 30 to 34 years. Similar proportions of private renting were seen for non-disabled people in these age groups at 29.3% and 27.8% respectively. For ages 35 to 64 years, the proportions of both disabled and non-disabled people private renting reduced as age increased.
- The proportion of disabled people of all ages (16 to 64 years) who rent social housing is higher than for non-disabled people. The greatest disparities are seen for those aged 40 years and over where the difference remains around 20 percentage points up to age 64.

We can take from this data 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.

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

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 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.

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.

Accessibility in relation to consultation.

In terms of accessibility, alternative means of contributing toward the consultation will be provided to cover those who may not be able to participate in person or digitally or who may be sight impaired. We will ensure that all resources in relation to the scheme are fully accessible. Therefore, we do not anticipate any negative impacts stakeholders.

4c. Gender Reassignment

Data

Borough Profile⁶

- Gender Identity different from sex registered at birth but no specific identity given – 0.5%
- Trans woman – 0.1%

⁶ Census 2021 - [Gender identity, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

- Trans man - 0.1%

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.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

i. **LGBT in Britain – Trans Report 2018: Stonewall**

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

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.

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

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 ⁷

Divorced or formerly in a same-sex civil partnership which is now legally dissolved: (9.9%)

Married or registered civil partnership: (35.8%)

Separated (but still legally married or still legally in a same-sex civil partnership): (2.9%)

Single (never married or never registered a same-sex civil partnership): (45.3%)

⁷ Census 2021 - [Marriage and civil partnership status in England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/relationshipsandmarriage/bulletins/marriageandcivilpartnershipstatusinenglandandwales/2021)

Widowed or surviving partner from a same-sex civil partnership: (6.1%)

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.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

i. **LGBT in Britain – Hate Crime and Discrimination Report 2017: Stonewall**

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

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.

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health 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*’.

4e. Pregnancy and Maternity

Data

Borough Profile ⁸

Live Births in Haringey 2021: 3,376

Target Population Profile

⁸ Births by Borough (ONS)

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.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

i. **A time for change: making renting fairer for private renters, Shelter (November 2020)**

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

State of our borough report indicates that 20% of Haringey's children are living in child poverty.

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.

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health 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, Additional HMO 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.

4f. Race

In the Equality Act 2010, race can mean ethnic or national origins, which may or may not be the same as a person's current nationality.⁹

Data

Borough Profile ¹⁰

Arab: 1.0%

Any other ethnic group: 8.7%

Asian: 8.7%

⁹ [Race discrimination | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://www.equalityhumanrights.com/en/our-work/anti-discrimination-law/race-discrimination)

¹⁰ Census 2021 - [Ethnic group, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/ethnicityandnationality/bulletins/census2021)

Bangladeshi: 1.8%

Chinese: 1.5%

Indian: 2.2%

Pakistani: 0.8%

Other Asian: 2.4%

Black: 17.6%

African: 9.4%

Caribbean: 6.2%

Other Black: 2.0%

Mixed: 7.0%

White and Asian: 1.5%

White and Black African: 1.0%

White and Black Caribbean: 2.0%

Other Mixed: 2.5%

White: 57.0% in total

English/Welsh/Scottish/Norther Irish/British: 31.9%

Irish: 2.2%

Gypsy or Irish Traveller: 0.1%

Roma: 0.8%

Other White: 22.1%

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.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

- i. **English Private Landlord Survey 2021: main report - GOV.UK (www.gov.uk)**
- ii. **A time for change: making renting fairer for private renters, Shelter (November 2020)**
- iii. **Ethnic group, England and Wales - Office for National Statistics (ons.gov.uk)**

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

The 2021 census that in England the private rented sector appears to be the most diverse in terms of ethnicity and nationality, compared with households living in other tenures. In 2017, the majority are white at 82%, the same as social renters and lower than owner occupiers (92%). The next single grouping is black households, who make up 55% of the private rented sector, compared with 8% of social renters and 1% owner occupiers.

Around three quarters (74%) of private renters are UK or Irish nationals, the lowest of any sector these being 91% of social renters and 97% of owner occupiers. Around 17% of private renters were EU citizens, compared with 4% and 2% of social renters and owner occupiers. The remaining 9% of the private rented sector have a nationality of outside the UK or Eu (5% social renters' sand 2% of owner occupiers).

Although we do not know the ethnicity of our residents in relation to their housing status, we do know that 67.1% of the Haringey population are from a BME group or Other White ethnic groups compared to 60.7% in London. Around 16.5% of residents in Haringey are from Black ethnic groups and one in ten are Asian (10.3%). Based on the national statistics on private renting and ethnicity it is highly likely that Haringey would share this trend.

We do not hold any data on the ethnicity of landlords operating in Haringey. However, we know from the English Private Landlord Survey 2021 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.

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

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 property licensing as a tool for immigration enforcement by working with border authorities to conduct raids on tenants whose immigration status was unclear. Immigration raids are controversial, with many migrant welfare and human rights charities advocating against them.

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.

4g. Religion or belief

Data

Borough Profile ¹¹

Christian: 39%

Buddhist: 0.9%

Hindu: 1.3%

Jewish: 3.6%

Muslim: 12.6%

No religion: 31.6%

Other religion: 2.3%

Religion not stated: 8.0%

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.

What data will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

- I. State of the Borough
- II. Religion, England and Wales - Office for National Statistics (ons.gov.uk)

Detail the findings of the data.

- i. Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- ii. Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

39.3% of Haringey residents report to be Christians, however most Haringey residents are likely to identify as having no religion (31.6%).

Over 180 languages are spoken by Haringey residents, and 30% of Haringey residents do not speak English as their main language. This is the 6th highest rate in London and above London average. Of those whose main language is not English in Haringey one in four either do not speak English well or not at all.

¹¹ Census 2021 - [Religion, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

It is really important given the language data that we ensure that these tenants, residents are not marginalised through the consultation, and we take account of these factors to ensure inclusivity of all.

4h. Sex

Data

Borough profile ¹²

Females: (51.8%)

Males: (48.2%)

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.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

- A time for change: making renting fairer for private renters, Shelter (November 2020)**

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

Due to a lack of local data in relation to sex of private renters, we are unable to confirm whether women are overrepresented in this sector. 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.

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

¹² Census 2021 - [Gender identity: age and sex, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/ethnicityandnationality/bulletins/genderidentityageandsexenglandandwales/2021)

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 ¹³

- Straight or heterosexual: 83.4%
- Gay or Lesbian: 2.7%
- Bisexual: 2.1%
- All other sexual orientations: 0.8%
- Not answered: 11.0%

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.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

i. **LGBT in Britain – Hate Crime and Discrimination Report 2017: Stonewall**

Detail the findings of the data.

- c) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- d) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

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

Potential 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.'

¹³ Census 2021 - [Sexual orientation, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

Income

- 6.9% of the population of Haringey were claiming unemployment benefit as of April 2023¹⁴
- 19.6% of residents were claiming Universal Credit as of March 2023¹⁵
- 29.3% of jobs in Haringey are paid below the London Living Wage¹⁶

Educational Attainment

- Haringey ranks 25th out of 32 in London for GCSE attainment (% of pupils achieving strong 9-5 pass in English and Maths)¹⁷
- 3.7% of Haringey's working age population had no qualifications as of 2021¹⁸
- 5.0% were qualified to level one only¹⁹

Area Deprivation

Haringey is the 4th most deprived in London as measured by the IMD score 2019. The most deprived LSOAs (Lower Super Output Areas, or small neighbourhood areas) are more heavily concentrated in the east of the borough, where more than half of the LSOAs fall into the 20% most deprived in the country.²⁰

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.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

- Ward profiles**
- A time for change: making renting fairer for private renters, Shelter (November 2020)**
- Annual Fuel Poverty Statistics Report, 2021, Department for Business, Energy, and Industrial Strategy (Figure 3.14)**

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?

¹⁴ ONS - [ONS Claimant Count](#)

¹⁵ DWP, StatXplore - [Universal Credit statistics, 29 April 2013 to 9 March 2023 - GOV.UK \(www.gov.uk\)](#)

¹⁶ ONS - [Annual Survey of Hours and Earnings \(ASHE\) - Estimates of the number and proportion of employee jobs with hourly pay below the living wage, by work geography, local authority and parliamentary constituency, UK, April 2017 and April 2018 - Office for National Statistics](#)

¹⁷ State of the borough, pg. 29, People: School Attainment - [State of the Borough - April 2023](#)

¹⁸ LG Inform - [Data and reports | LG Inform \(local.gov.uk\)](#)

¹⁹ LG Inform - [Data and reports | LG Inform \(local.gov.uk\)](#)

²⁰ [State of the Borough - April 2023](#) pg. 18

- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

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 aged 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.

Potential Impacts

- **Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).**

By raising property standards across the PRS through this proposed boroughwide designation, HMO licensing will have an overall positive impact on tackling the socio-economic inequalities observed in our borough. We know that deprivation is at its highest on the east of the borough which this scheme will be applicable too. 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.

We are aware that the current cost of living crisis is affecting Landlords as well as tenants. We fully expect concerns to be raised as part of the consultation process regarding the Licence fee. Although the licence fee costs for landlords are nominal when broken down on a weekly basis in comparison to the average market rate for rent, we accept at this time a further financial burden is of a concern. The licence fee will be considered as part of the consultation process, but a fee is essential to cover the administrative, operational and compliance costs associated with the scheme.

Furthermore, scheme discounts will be consulted upon which would be offered to incentivise greater compliance and reduce the costs incurred by landlords.

5. Key Impacts Summary

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

The PRS is utilised by all of the protected groups and therefore all will be affected by this proposal. We do not hold specific data on the PRS population based on their protected characteristics in Haringey but can use national data and trend to allow us to compare. 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

- Many proposals will predominantly impact individuals who have more than one protected characteristic, thereby transforming the impact of the decision.
- This section is about applying a systemic analysis to the impact of the decision and ensuring protected characteristics are not considered in isolation from the individuals who embody them.

Please consider if there is an impact on one or more of the protected groups?

Who are the groups and what is the impact?

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

Based on your data are there any relevant groups who have not yet been consulted or engaged? Please explain how you will address this.

As the private rented sector is such a transient sector it is very difficult for us to capture data on tenant status across our borough. The consultation will take account of this and can be scoped to capture this data as part of the consultation process. Helping to scope any further policy decisions.

6. Overall impact of the policy for the Public Sector Equality Duty

Summarise the key implications of the decision for people with protected characteristics.

In your answer, please consider the following three questions:

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

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?

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

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. 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 **N.**

Adjust the proposal: the EQIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly set out below 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**

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?

Action:

None

7. Ongoing monitoring

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

- Who will be responsible for the monitoring?
- What the type of data needed is and how often it will be analysed.
- When the policy will be reviewed and what evidence could trigger an early revision
- How to continue to involve relevant groups and communities in the implementation and monitoring of the policy?

The consultation results will be reviewed and analysed. Any negative impacts highlighted will be considered as part of this process and mitigations put in place to ensure that they are taken into account where possible within the policy.

Date of EQIA monitoring review:

- **Following Consultation if approved by cabinet.**

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.

