



Licensing Cabinet Report 2019

Appendix 10: Equality Analysis for Selective and Additional Licensing

Name of service change or function	Selective and Additional Licensing Scheme 2019
Directorate/Service	Community Well Being: Housing & Culture Private Housing Services - Licensing
EA undertaken by/contact:	Tony Jemmott – PHS Licensing Manager Ext 2377
Version/Date:	V1.TJ – September 2019
Date of next review (if applicable):	14 th October 2020

Introduction

The Public Sector Equality Duty (PSED), section 149 of the Equality Act 2010 requires the Council to have “due regard” to its equality aims when exercising its public functions. Brent believes that an Equality Analysis (EA) is the best method to demonstrate compliance with the PSED.

Brent is one of the most diverse boroughs in the UK and to work effectively in such a diverse setting, we need to have a good understanding of all our communities and to apply an evidence-based approach to our decision-making processes.

This EA is informed by 2011 Census and other data sources about the demographic, diversity and socio-economic characteristics of the local population across the borough, including: age, sex, disability and long-term health conditions, ethnicity, religion or belief, sexual orientation, gender reassignment, marriage and civil partnership, pregnancy and maternity and income status. We have benchmarked census data for Brent against England and Wales, London, Inner London and Outer London and data from other sources against London and Great Britain.

Brent's equality objectives 2015-2019

Under the Equality Act 2010, we have a duty to develop and publish equality objectives and make sure that we can show how we can measure improvement over the next three to five years. We have set five equality and human rights objectives in order to achieve key equalities outcomes for those who live and work in Brent:

- 1.To know and understand all our communities
- 2.To involve our communities effectively
- 3.To demonstrate leadership in equalities and human rights, both within the council and amongst partners, and organisational commitment to excellence
- 4.To ensure that local public services are responsive to different needs and treat users with dignity and respect

5.To develop and sustain a skilled and committed workforce able to meet the needs of all local people.

More information about our equality objectives and how we implement these are found in our Equality Strategy 2015/19.

This EA is also informed by the Equality Strategy 2015 - 2019, recent Diversity in Brent reports and the Equality profile for Brent (March 2019). We have gathered enviro-crime data from our council's recording databases, police recorded crime for Brent, household and property data from our own records, data from the latest English Housing Condition Survey reports and data from a Brent commissioned Housing Stock Survey undertaken by the Building Research Establishment, who reported in March 2019.

The data in respect to equalities is considered in relation to licensing criteria of levels of anti-social behaviour (ASB), poor property conditions, migration, deprivation and crime. ASB and crime will include *hate crimes*. There may be differences between 2011 Census data and data more recently collected by service areas. Last but not least, the EA has also been informed by the responses of our licensing public consultation carried out from 10th June 2019 to 25th August 2019. The Council engaged the services of independent consultants Opinion Research Services (ORS), who as part of the consultation collated respondents' diversity information to identify the potential/likely impact that our proposal may have on people with protected characteristics, and to inform our action plan. The full ORS report as included as Appendix 1 of the Cabinet report.

Stage 1 Screening Data

1. What are the objectives and expected outcomes of your proposal? Why is it needed? Make sure you highlight any proposed changes.

The Council report is proposing that selective licensing is renewed in Harlesden, Willesden Green and Wembley Central and extended to 13 other wards within Brent. The Report also proposes to renew borough wide additional licensing for HMOs that fall outside the mandatory HMO licensing scheme, typically those with fewer than 5 occupants. The council recognises that much of the private rented sector in Brent offers good accommodation to people who want to live in the borough, but also that parts of the borough are badly managed, in poor condition, and in some cases, unsafe. The proposal to renew selective licensing is intended to improve the conditions in the private rented sector (PRS) and to enhance housing management standards. Extending selective licensing will give the Council additional powers to tackle anti-social behaviour, poor property conditions and high levels of migration, deprivation and crime in Brent. Overall if licensing is extended, it will help the council to work with landlords, tenants and businesses, and with internal and external partners to drive up standards. In summary, we believe that property licensing will:

- 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 Brent and ensure that they are "fit and proper" persons to manage rented properties
- Give us the opportunity to inspect the properties to assess living conditions and to advise landlords, managing agents and tenants about their obligations
- Impose the Housing Act mandatory conditions and a set of local conditions as a minimum letting standard in Brent
- Redefine how the service operates by shifting the emphasis from a customer complaints led, reactive service
- Address housing issues resulting from the movement of new and emerging communities and to preserve or improve the socio-economic conditions of the area
- Ensure that a proper standard of management of privately rented property is maintained and that properties do not become 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
- Address hate crime and homophobic incidents
- Apply enforcement action to tackle those rogue landlords in the sector

If introduced the effect will be that landlords who rent or let any residential accommodation in any area designated for additional or selective licensing in Brent must have a licence.

Applications must be made to the Council and shall be accompanied by a licence fee. The mandatory conditions (Housing Act 2004, Schedule 4) below as well as Brent local conditions and schedule of works will be applied to licences and the requirements will be enforced by the council. The licensing conditions are provided as Appendices 8 and 9 to the Cabinet Report.

- If gas is supplied to the house, to produce to the LHA annually for their inspection a gas safety certificate obtained in respect of the house within the last 12 months.
- To keep electrical appliances and furniture made available by him in the house in a safe condition; and to supply a declaration as to the safety of such appliances and furniture.
- Ensure that a smoke alarm is installed on each story of the house and to keep them in proper working order;
- Ensure that a carbon monoxide is installed in any room which is used as living accommodation and contains a solid fuel burning combustion appliance
- Supply the occupier with a written statement of the terms of occupation;
- Demand references from persons wishing to occupy the house.
- Conditions in relation to the minimum room floor areas to be used by persons as sleeping accommodation
- Condition regarding the maximum permitted number of persons per room based on age
- Time period for compliance with overcrowding for licences granted on or after 1st October 2018
- Condition relating to the storage and disposal of household waste pending collection.

2. Who is affected by the proposal? Consider residents, staff and external stakeholders.

Private sector landlords and their tenants within the wards in scope will be directly affected by the proposals. We anticipate that the majority of residents will be positively affected by the proposal. Council employees will see an increase in their workloads and service growth benefits. The implications for staff will be considered as part of Council's internal policies and processes.

Landlords and Managing agents

In deciding whether or not to grant a licence, the council must consider whether the landlord (or the managing agent) is a 'fit and proper' person. The rules that must be followed in order to determine this are set out in sections 66 and 89 of the Housing Act 2004. The local authority must have regard to any previous convictions relating to violence, sexual offences, drugs or fraud; whether the proposed license holder has contravened any laws relating to housing or landlord and tenant issues; and whether the person has been found guilty of unlawful discrimination practices.

The Council can decide, following the appropriate checks, that the landlord is not 'fit and proper' and may therefore refuse to grant a licence. The local authority can also withdraw a licence after issue if the licensee is no longer considered a 'fit and proper' person. The landlord has the right to appeal against this decision.

The Council must also satisfy itself that the person to whom the licence is granted is the most 'appropriate' person – which could involve taking into account whether they have ownership or management responsibility for the property in question.

The Council must also confirm that there are satisfactory management arrangements in place regarding the property; in doing so, it must have regard to a range of factors including: the

competence of the manager; management structures; and soundness of the financial arrangements.

Licences are issued for a period of 5 years, although local authorities may issue licences for shorter periods where certain requirements have not been met. Landlords will be required to pay a licence fee.

Landlords operating a property in the designated area without a licence, or those landlords who fail to comply with any licence condition can be prosecuted and face unlimited fines, or issued with Civil Penalties of up to £30,000.00.

Tenants and residents

On the whole, tenants will benefit from an improvement in their property conditions and better standards of managing. Built into the licensing system is a rationale for elimination discriminatory practices by landlords.

We recognise, however, that some landlords will seek to pass on licensing costs they incur to tenants and that this action which may result in some tenant displacement and landlords' claims for possession, through both legal and illegal means. Tenants might also potentially be affected due to enforcement actions against landlords of overcrowded properties. Every effort will be made to ensure that affected tenants are supported and signposted to relevant agencies.

Council employees

The local authority is also obliged to take reasonable steps to ensure that licence applications are made and dealt with without undue delay. Staff will also be required to carry to compliance and enforcement work. This will have staffing and financial resources implications.

3.1 Could the proposal impact on people in different ways because of their equality characteristics?

All groups who own, manage or live in privately rented accommodation are likely to be affected. People of ethnic minority origin, single parents and young children and certain vulnerable people e.g. those with mental health, drug or alcohol addiction, low income or on state benefits, are key tenant groups and are therefore likely to be affected as they are over-represented in private rented sector, and notably in properties which are in poorer condition.

3.2 Could the proposal have a disproportionate impact on some equality groups? If you answered 'Yes' please indicate which equality characteristic(s) are impacted

Given the population demographics in Brent the proposal will have an impact on some equality groups such as age, gender, race and disability. Nationally over 20% of renters are families with children. Further detail is available below in the second part of the EA.

3.3 Would the proposal change or remove services used by vulnerable groups of people?

No, we do not think so, but vulnerable people will need access to further housing needs advice and referral agencies

3.4 Does the proposal relate to an area with known inequalities?

Yes – There are known health and socio-economic inequalities in the UK private rented sector with further evidence of highest rents and poorest housing in the PRS. Nationally, tenants are more likely to be on low incomes, and earnings are typically more than 40% of the tenant's gross income, (English Housing Survey). More than 30% of homes are in poor condition (classified as non-decent) which is higher than in the owner-occupied or social rented sector. There is a strong correlation between poor quality housing and fuel poverty. A high % of the PRS would fail the HHSRS "excess cold" hazard. (Note the headline result from the BRE 2019 report)

According to the Equality Profile for Brent 2019, around one in seven Brent residents have a long-term health problem or disability that limits their day-to-day-activities in some way. The prevalence of disability rises sharply with age: more than half of all residents aged 65 and over had a long-term health problem or disability.

BRE data clearly shows that concentrations of low income households are found towards a central strip of Brent running from parts of Welsh Harp ward towards the north to Harlesden in the south. The highest levels overall are found in Harlesden, Stonebridge and Kensal Green. In Harlesden most of the ward has high levels of low income; in Stonebridge ward the highest levels are to the north west and east; and in Kensal Green ward the highest levels are to the west. There are other areas which also have high concentrations of low income households; for example, to the south and west of Dudden Hill ward and in parts of Willesden Green.

The BRE study contain maps that provide an additional layer of information, with the data for low income households being combined with HHSRS excess cold data. This provides a vital picture of where vulnerable people are likely to be living in poor housing. The map indicates that there are pockets of both low income and excess cold towards the north of Stonebridge, south and west of Welsh Harp and northern parts of Dudden Hill.

In terms of deprivation, 36 Lower Super Output Areas (LSOAs) in Brent fall into the 20% most deprived areas in England, including all of the LSOAs in Stonebridge and the majority in Harlesden.

3.5 Is the proposal likely to be sensitive or important for some people because of their equality characteristics?

Yes - Many tenants are reluctant to ask for repairs or complain for fear of eviction. Built into the licensing system is a rationale for elimination discriminatory practices by landlords.

3.6 Does the proposal relate to one of Brent's equality objectives?

Yes, it relates to all 5 of Brent's Equality objectives. These objectives are already listed in introduction above.

Recommend this EA for Full Analysis?

No – A full EA was undertaken in 2017, this is still very much valid and as such an update of the population statistics, and of the action plan is felt to be adequate.

4. Use the comments box below to give brief details of what further information you will need to complete a Full Equality Analysis. What information will give you a full picture of how well the proposal will work for different groups of people? How will you gather this information? Consider engagement initiatives, research and equality monitoring data.

Stage 2: Analysis

5. What effects could your policy have on different equality groups and on cohesion and good relations?

5.1 Age (select all that apply)

- Positive
- Neutral
- Negative

Figure 1: Brent Tenure by Age
Population profile by age and gender, Brent and UK, 2017

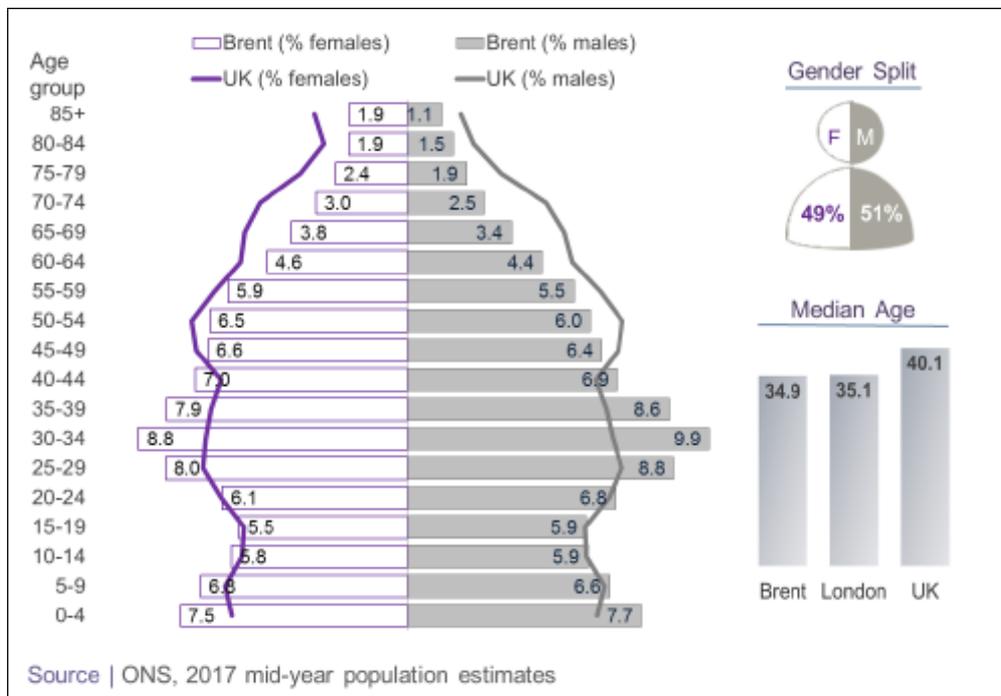


Figure 2: Population Count by Age, Brent, 2019

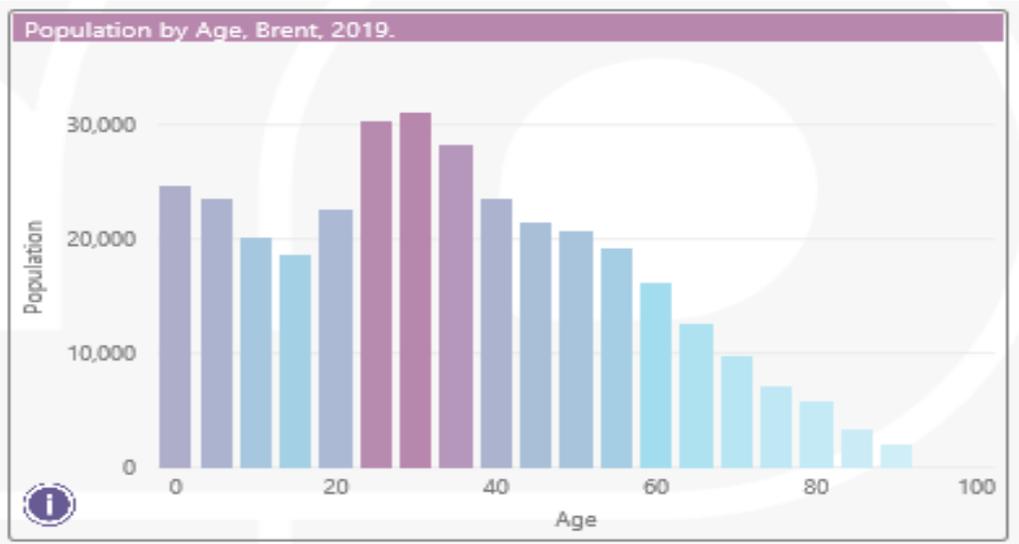
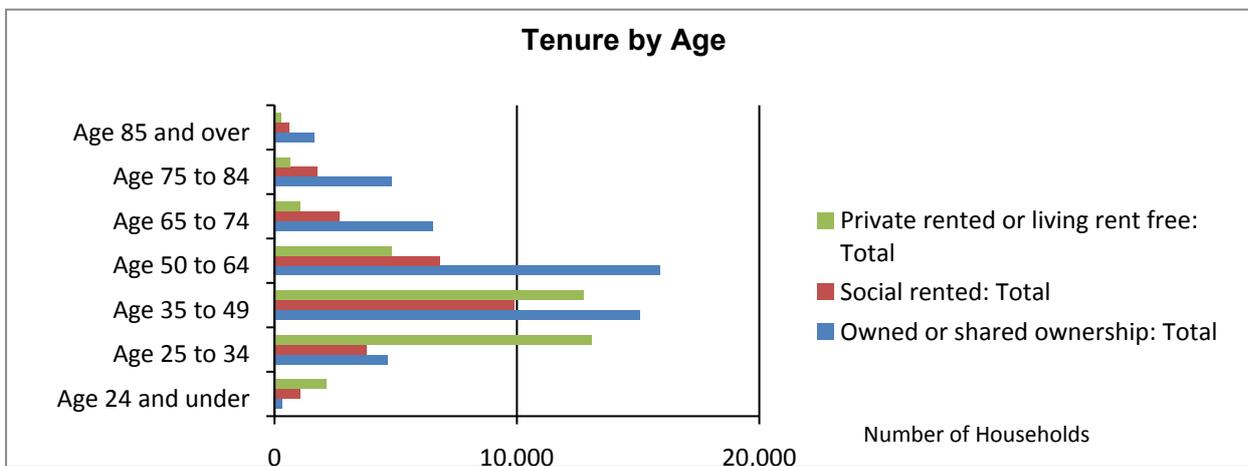


Figure 3: Tenure by Age



Source: ONS Crown Copyright Reserved [from Nomis on 16 July 2013]

The population has been growing strongly in recent years and this is expected to continue. In the next twenty years, the Brent population is expected to grow from 334,700 in 2018 up to 395,800 in 2038 – a rise of 18% and an additional 61,100 residents. Population growth is expected to be heavily concentrated in the areas where housing development is planned to take place. The two wards likely to see the fastest growth are Tokyngton (+161% rise in population) and Alperton (+103%) – the population in both these wards is expected to more than double. Considered together, these two wards are projected to accommodate an additional 46,400 residents by 2038.

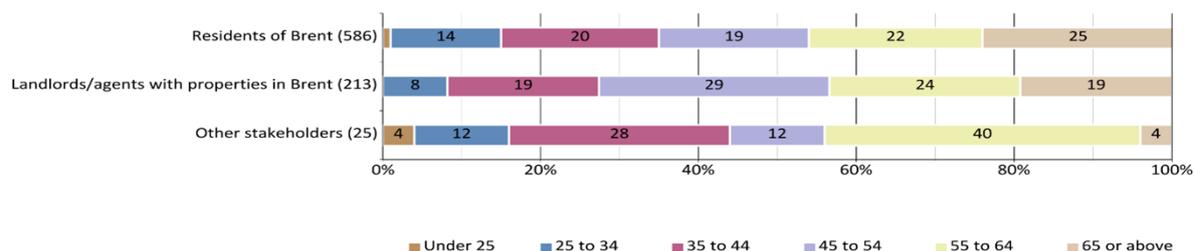
In common with other London Boroughs, Brent has a relatively young population. In 2017, the median age of the population was 35 in Brent, the same as in London, but five years lower than the national average (40 years, UK).

Compared with the UK, Brent has proportionately fewer over 50s and proportionately more adults aged 25-49. In Brent, 28% of the population is aged over 50 compared with 37% across the UK. Conversely, 39% of the borough's population is aged 25-49 compared with 33% in the UK. Brent also has a higher proportion of children aged under five compared with the UK (8% vs. 6%).

The proposal to renew and extend discretionary licensing is intended to enhance housing management standards in the private sector, in compliance with the Housing health and safety rating system (HHSRS) standards, which will have a positive impact on all age groups. Vulnerable age groups will particularly benefit from health intervention e.g. damp and moulds, infections,

reduction of trip hazards and falls as well as the requirements around excess cold which can cause or exacerbate poor health.

Table 1: Questionnaire: Age Group What was your age on your last birthday?



Brent Licensing Consultation 10 Jun -25 Aug 2019

16% (same as in the 2017 EA study) of residents under 34 years old responded to the survey which is significantly below the borough average of 51%. Other age groups were well represented in the survey.

Table 1.1: Age Group - Residents Face-to face Interview survey (ORS July 2019)

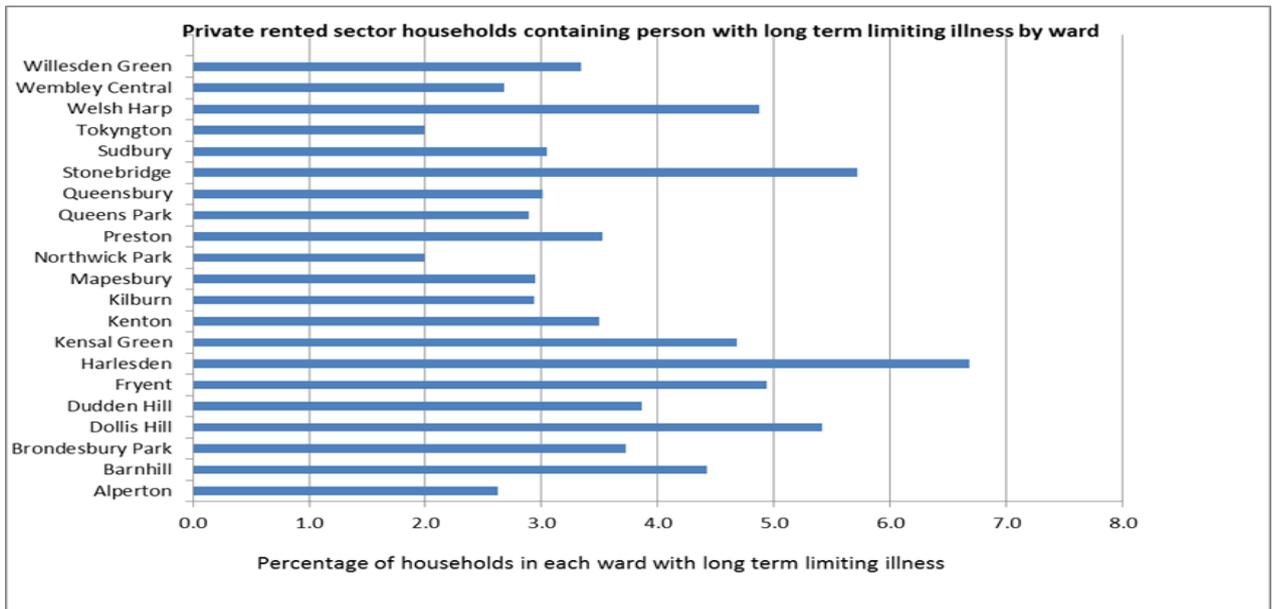
Characteristic	Unweighted Count	Unweighted Valid %	Weighted Valid %	Resident Population %
BY AGE				
16 to 24	107	18	14	14
25 to 34	151	25	23	23
35 to 44	114	19	20	19
45 to 54	84	14	16	16
55 to 64	67	11	11	13
65 to 74	51	8	9	8
75 or over	31	5	6	7
Total valid responses	605	100	100	100

Figure 1.1 shows how the F2F quota sampling met the target met the number of interviews required by age.

5.2 Disability (select all that apply)

- Positive
- Neutral
- Negative

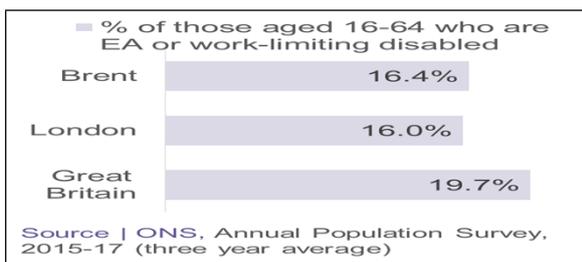
Please give details: Figure 4: Disability



The above chart in Figure 4 details the disability profile in the PRS by ward, showing that there are higher proportions of PRS households comprising disabled tenants in Harlesden, Stonebridge and Dollis Hill wards. The 2011 Census found that around one in seven Brent residents (14%) had a long-term health problem or disability that limited their day-to-day-activities in some way: 7% said their activities were limited a lot, and 7% said their activities were limited a little. This compares with a rate of 14.2% for London and 3.4% lower than the national figure.

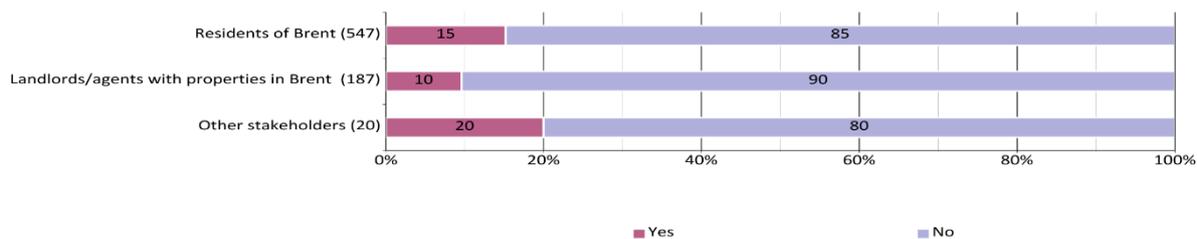
More recent survey data (ONS 2015-17), which focuses on the working age population, indicates that around 16% of Brent residents aged 16-64 are disabled according to the Equality Act 2010 and/or Work-limiting definition. The Equality Act 2010 definition aims to capture those who have a physical or mental impairment that has a substantial, and long-term, negative effect on their ability to do normal daily activities. The work-limiting definition relates to those whose disability which affects the kind or amount of work they might do. The prevalence of disability in Brent is similar to the London average (16%), but lower than the national average (Great Britain, 20%), reflecting that the Brent and London populations have a younger age profile compared with Great Britain.

Figure 5: Percentage of working age residents who are disabled, Brent, 2015-2017



One of the potential outcomes of licensing is that landlords will be more aware of their duties under the Equality Act 2010 and of the support that is available to disabled people including information on the availability of Disabled Facilities Grant. Disabled people will also benefit from the need for PRS homes to comply with the Housing Health and Safety Rating System in terms of reasonable adaptations, reducing trip hazards and falls as well as the requirements around excess cold which can cause or exacerbate poor health.

Table 2: Disability - Do you have any long-standing illness or disability?



(Brent Licensing Consultation 10 Jun -25 Aug 2019)

Table 2 shows that the disability profile of residents is broadly reflective of the borough disability profile of 14.5%. The residents figure for the 2017 EA was 13%.

5.3 Sex/Gender (select all that apply)

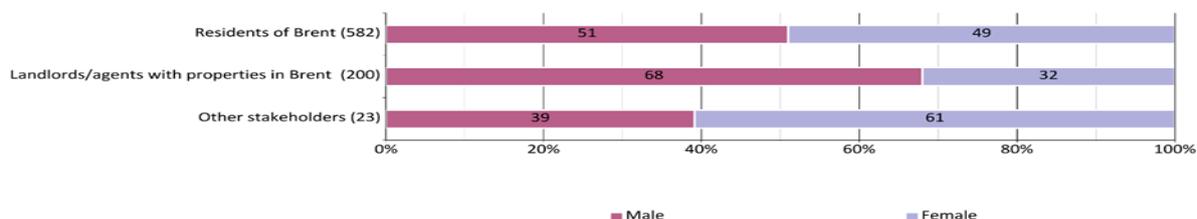
- Positive
- Neutral
- Negative

The gender split in the population is 51% male and 49% female. Brent has a slightly higher proportion of males compared with London or the UK (50% and 49%). The proportion of men is highest in the 20-39 age group where they comprise 53%-54% of the population. In contrast, women make up a higher proportion of the Borough's elderly population: 62% of those aged 85 and over are female. (Source Equality Profile of Brent 2019)

Breakdown of Consultation Participants by Gender

Out of all the residents who responded to the consultation 47% were male and 42% were female. From all the landlords who took part in the consultation 57% were Male and 29% were female. There is no information relating to the gender profile of landlords. Although half as many women responded. There was active female presence in the Brent Landlord forum on 25th June 2019 where the licensing proposals were consulted upon.

Table 3: Gender



(Brent Licensing Consultation 10 Jun -25 Aug 2019)

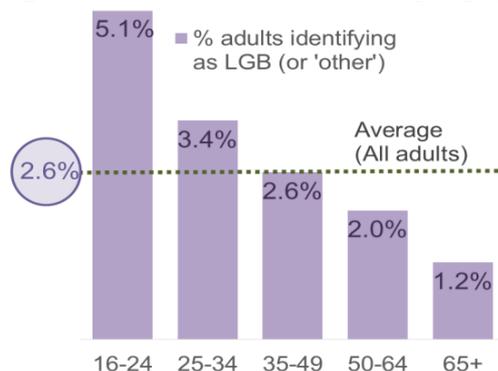
Literature was sent to all households. Table 3 shows that female respondents match the Borough profile where women represent 49% of the population. There is no data on the gender breakdown of those living in the PRS in Brent.

There is insufficient data available to measure accurately the potential impact of the proposal on gender. However, one of the aims of discretionary licensing is to tackle antisocial behaviour which is likely to have a positive impact on both genders, particularly for women and girls. Both sexes are likely to benefit from improvement in the PRS. There were no comments made during the consultation with particular reference to gender.

5.4 Sexual orientation and gender identity (select all that apply)

- Positive
- Neutral
- Negative

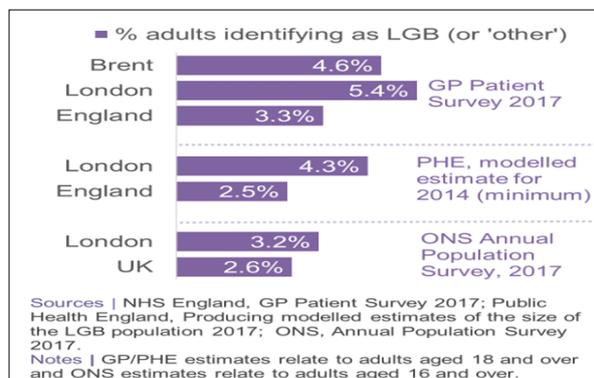
Figure 6: Sexual Orientation by Age, 2017, UK



Source | ONS, Annual Population Survey, 2017

The 2017 GP Patient Survey found that 4.6% of Brent adults surveyed identified as Lesbian, Gay, Bisexual (or 'Other'). The percentage in Brent was below the London average (5.4%) but well above the England estimate (3.3%). The GP Survey is one of the few sources that provides Borough level data and tends to provide slightly higher estimates compared with other sources.

Figure 7: LGB estimates compared



A recent study by Public Health England (PHE) provided modelled estimates of the size of the LGB population based on data from 15 different studies. It concluded that the percentage of LGB adults was at least 2.5% across England and 4.3% in London – these figures were considered a 'minimum'.

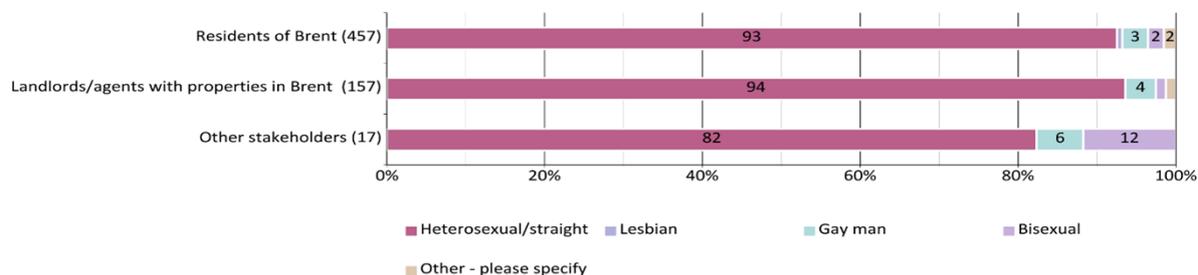
The 2017 Annual Population Survey found that 2.6% of UK adults, and 3.2% of Londoners identified as LGB (or 'other'). The survey also found that young adults were more than four times as likely to identify as LGB than those aged 65+ (5.1% vs. 1.2%).

Stonewall research has found that many LGBT people of all ages experience homophobic harassment and violence in their neighbourhood. Someone may know or suspect their sexuality. Harassment can include name-calling, graffiti, and criminal damage and over time even seemingly

small incidents can cause extreme distress and fear, with people often too frightened to leave their own home.

Results of the consultation relating to Sexual Orientation and Gender Identity

Table 5: What is your sexual orientation?

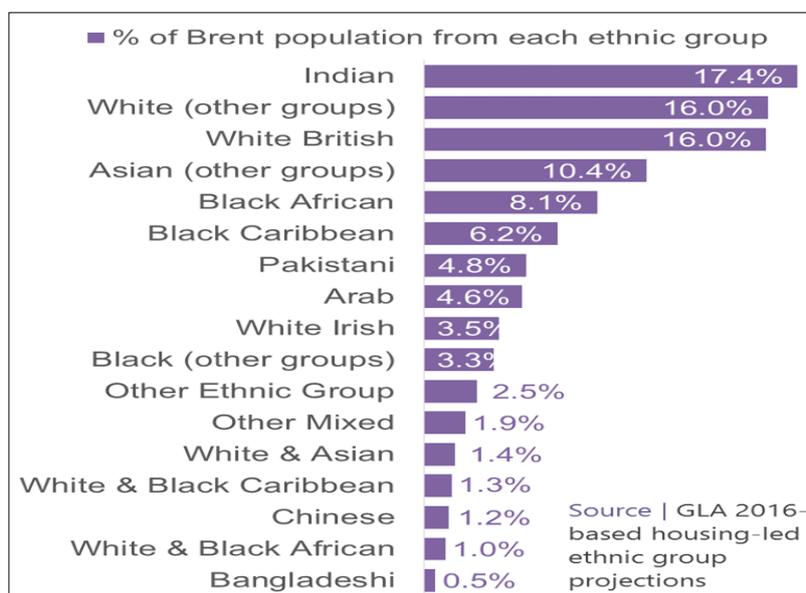


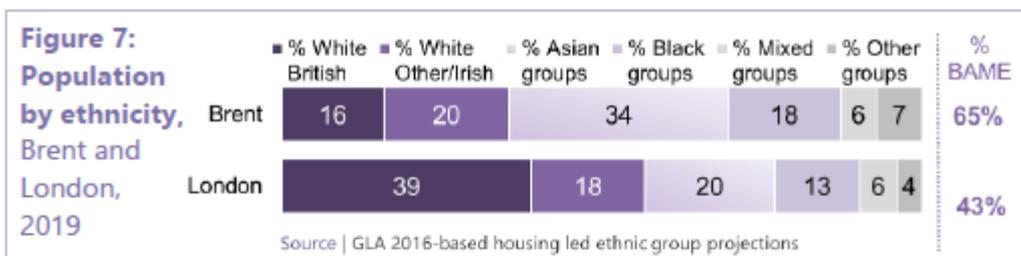
(Brent Licensing Consultation 10 Jun -25 Aug 2019)

5.5 Ethnic Origin

Brent is home to many communities and is one of the most diverse boroughs in London: almost two thirds of the population are from BAME groups, the third highest in London, after Newham and Redbridge. Brent has a large Asian population: one third of residents are from Asian groups compared with 20% across London. One in six residents have Indian ethnicity – more than double the London average (17% vs. 7%) – and the fourth highest in London. Other groups particularly well represented in Brent (compared with other areas in London) include the White Irish, Arab and Other Asian groups. In contrast, just 16% of residents are White British, the second lowest in London, after Newham (13%).

Figure 8: Population by ethnicity, Brent, 2019



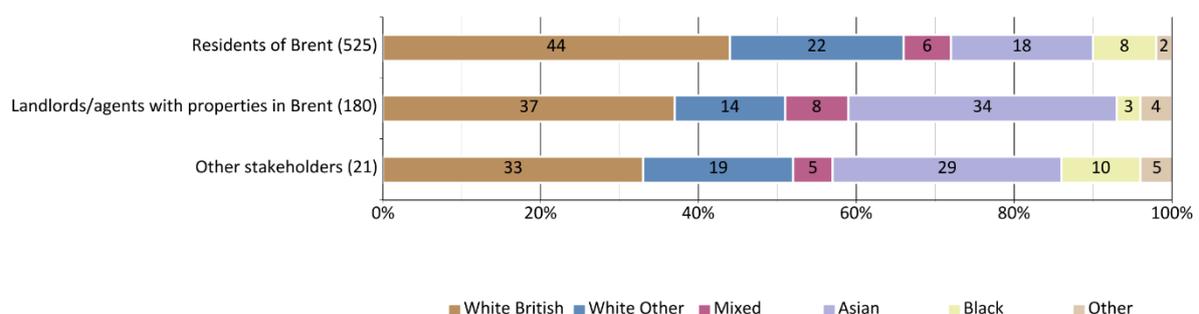


Ethnicity by age

According to the Simpson's Diversity Index¹, which takes account of the mix and size of 17 different ethnic groups in the population, Brent is the second most diverse borough in London, after Newham (Figure 8). There are considerable differences in the age profile of the borough's different ethnic groups. Those from mixed ethnic groups are typically younger: almost half are children aged under 18. Other groups with younger age profiles include the Black African, Arab and Other Black groups: in all these groups more than one third of the population are children. The White Irish and Black Caribbean populations have older age profiles: over one third of Irish residents, and around one fifth of Black Caribbean residents are aged 65 and over. The White Other and Chinese groups have the largest working age populations – in both groups – three quarters are aged 18-64.

Table 6: Results of the consultation relating to ethnic origin

How would you describe your ethnic origin? (Grouped Responses)



(Brent Licensing Consultation 10 Jun - 25 Aug 2019)

5.6 Religion or belief (select all that apply)

- Positive
- Neutral
- Negative

Please give details:

The borough's three largest religious groups are Christian (41%), Muslim (19%) and Hindu (18%). Other smaller, but significant, groups represented in the borough included: Jewish and Buddhist residents (both 1.4%) and Sikh residents (0.5%).

Compared with other areas, Brent residents are more likely to have a religion: in Brent, 82% had a religion compared with 71% across London and 68% nationally – the fourth highest rate in England and Wales. Just 11% had no religion. The remaining 7% chose not to state their religion on the Census form.

The borough has the second largest Hindu population in England and Wales, after Harrow and the 10th largest Muslim population nationally (as a percentage of the population). While a relatively small proportion of residents are Buddhists – just 1.4% - this is the 6th highest percentage nationally.

More people in Brent had a religion than London and nationally: 1 in 10 Brent residents stated they had no religion, compared to 1 in 5 people in London and 1 in 4 people in England and Wales. The largest religious groups in Brent were: Christian (41% compared to 48.4% in London); Muslim (18.6% compared to 12.4% in London); Hindu (17.8% compared to 5.5% in London).

The biggest changes to religious groups in Brent were: 79% increase to the proportion of Muslim people, 72% increase to the proportion of Buddhist people, 32% decrease to the proportion of Jewish people. 2,462 people stated that they were Jain and 1,709 people stated that they were Sikh.

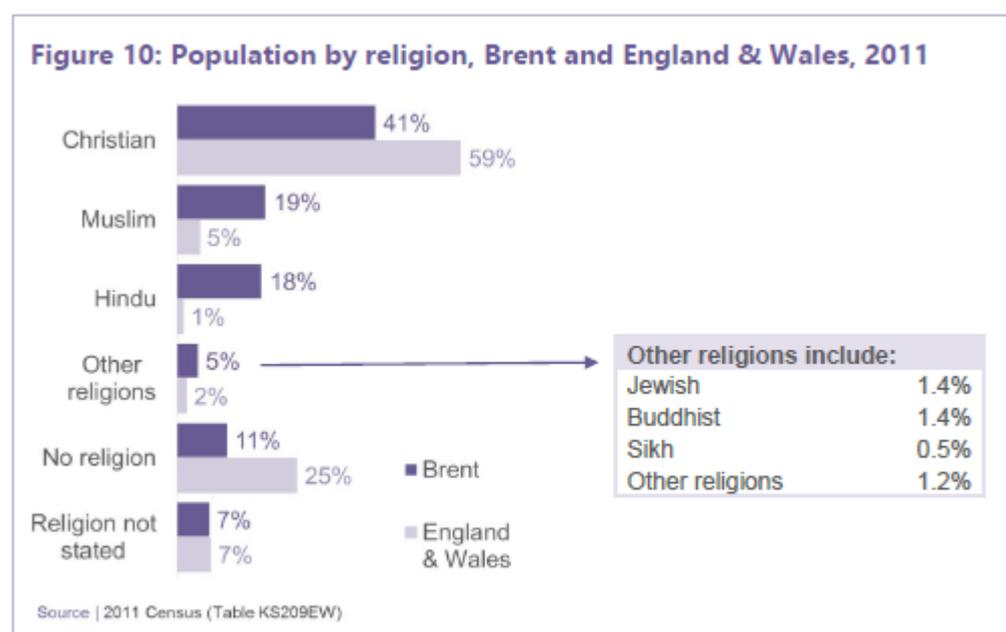
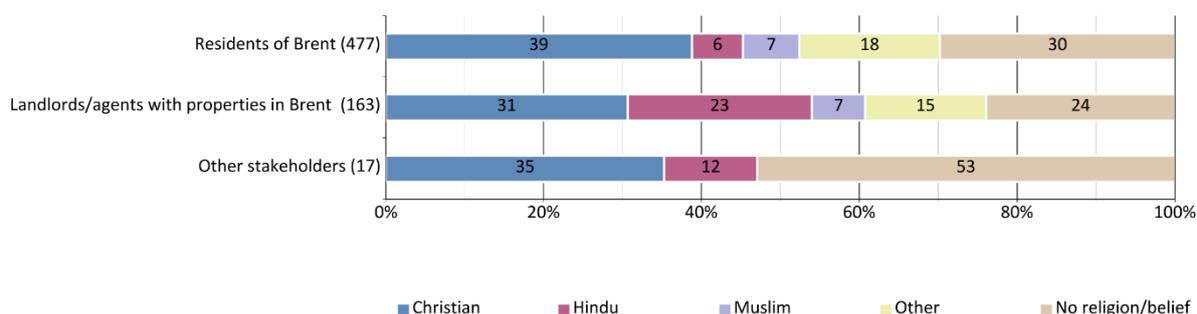


Figure 10: What is your religion or belief? (Grouped Responses)



(Brent Licensing Consultation 10 Jun -25 Aug 2019)

From Figure 10, Christian, Hindu and Muslim residents seem to be well represented in the survey compared to the Borough profile. Christian and Muslim landlords also seem to be under-represented, while Hindu landlords appear to be marginally overrepresented in the consultation. It should be noted, however, that the percentages of those who preferred not to disclose their religious beliefs are very high.

There is insufficient data available to measure accurately the potential impact of the proposal on religion or belief. However, one of the aims of selective licensing is to tackle antisocial behaviour, including hate crime and incidents and this is likely to have a positive impact on this characteristic. There were no direct comments made in relation to religion or belief.

5.7 Other (please specify)

5.7.1 Socio-economic disadvantage

- Positive
- Neutral
- Negative

Please give details:

Socio-economic status of the local area

In 2015 Brent ranked 39th in England among local authorities according to the index of multiple deprivation (IMD). Brent has 173 lowest super output areas (LSOA) indicating that deprivation exists in concentrated pockets throughout the borough. The wards of Stonebridge and Harlesden rank in the top 25 most deprived wards of London boroughs.

Figures for average income across London boroughs were gained from the Median household income (CACI 2014) and the latest Diversity in Brent reports.

- In 2014, the median income in Brent is £31,601. Within London, Brent ranks as the 6th lowest borough in terms of median household income.
- Income varies widely from ward to ward. Stonebridge has the lowest median household income (£22,188) and Queen's Park has the highest (£41,423).
- Over one third of Brent's working age population are paid less than the London Living Wage, with Black African, Pakistani and Bangladeshi residents being much more likely to be paid less than the London Living Wage.

5.7.2 Marriage and Civil Partnership

Marital status of Brent adults as at 2011. At this time, 43% were married and 0.3% were in a civil partnership (648 residents). The remaining were either single (42%) or separated, divorced or widowed (14%). The proportion who were in a civil partnership in Brent was marginally lower than the London average (0.4%) and marginally higher than the England average (0.2%).

Figure 11: Marital status of adults aged 16 and over, 2011

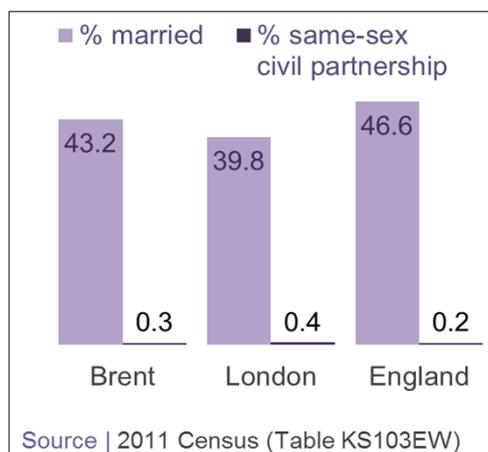
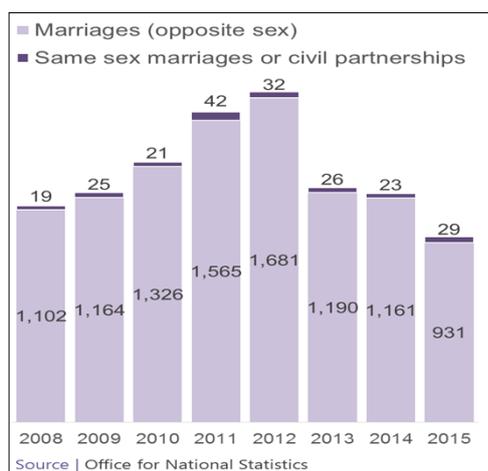


Figure 12: Number of Marriage and Civil Partnerships formed in Brent, 2008-15



5.8 Gender reassignment and gender identity

Statistics around transition and gender identity are extremely limited. Estimates from the Gender Identity Research and Education Society (GIRES) suggest that around 0.02% of UK adults may have undergone transition, or are receiving treatment (0.03%), and that 0.2% may seek treatment in the future. Currently, there are no local authority level statistics on GRCs or the transgender population. However, there are plans to include a new question on the 2021 Census about gender identity, which will provide local data about this important topic for the first time.

5.9 Homelessness

Although Brent has continued to increase its dwelling stock over the last 10 years (period 2006 - 2016) by 10.5%, its current housing stock does not meet demand. Brent Council's own housing stock consists of 11,378 homes as of February 2018, comprised of 7,878 rented and

3,500 leasehold properties. According to the Social Housing Regulator, in 2018, there were 55 RPs operating in Brent, managing 20,221 affordable homes for rent. As of 1st April 2018, 3,632 households are in Bands A-C on the Housing Register (those considered to be in housing need). Brent has had one of the largest temporary accommodation portfolios in the country for many years. As of 31st December 2018, Brent Council reports to have 2,348 households in Temporary Accommodation, a total reduction of around 44% since 2004. In 2016/17, 294 individuals were recorded rough sleeping in Brent, a 39% increase on figures from 2015/16. Brent is taking a range of actions to address demand arising from homelessness and reduce reliance on temporary accommodation.

The number of housing benefit claimants in Brent reached its peak in 2012-13 at 38,099, as of March 2019 this number is 32,644, a reduction of 1,924 since November 2018, when Universal Credit (UC) went live in Brent. Brent has the highest number of housing benefit claimants in all of the outer London Boroughs, and has the 2nd highest number of housing benefit claimants in social rented accommodation.

As of Q3 2017, Brent had the 12th highest median private rent levels in London, and the highest median private rent levels in outer London.

The private sector therefore plays an important role being a key source of temporary and permanent accommodation to meet it. Licensing can play a significant role in ensuring that the sector is well managed and provides settled and decent accommodation for Brent residents. It is also recognised though a Brent commissioned study report by Future of London 2017, that licensing enforcement action could lead to homelessness and the council acts to secure the rights of tenants and provide advice and assistance as required. There has been no evidence of any significant level of homelessness applications directly arising from licensing activity.

It is also recognised that enforcement action in relation to licensing could lead to homelessness, although there is no evidence to suggest a disproportionate increase in homelessness applications directly arising from our current licensing activity. The council acts to secure the rights of tenants and provide advice and assistance as required.

HMO licensing will apply a condition in relation to the maximum permitted number of persons that are allowed to occupy the dwelling for sleeping purposes. Wherever possible the Council will work with landlords to make properties fit for the number of number of tenants.

When required, overcrowding is assessed under the housing, health and safety rating system (HHSRS). Where category 1 hazards are found, action will be taken under Part 1 of the Housing Act.

Findings from the Brent Consultation June – August 2019 in respect of homelessness

Several submissions and groups raised concern about the impact of licensing on homelessness, on one hand that homelessness might increase, especially among people with protected characteristics, but as a counter-position, that the schemes will provide better protection for tenants.

There were calls for the Council to indicate how tenants and landlords will be supported, and to provide reports on the achievements of the scheme against set targets.

The Government is proposing a consultation on the abolition of Section 21, so called 'no fault', repossessions in the private rented sector in favour of improving the court system to ensure landlords can more speedily repossess properties through them in legitimate cases. Landlord and tenant organisations have voiced their views on the impact of the particular sectors. Landlords

warning of “serious dangers” to the supply of rental housing for vulnerable tenants on the one hand and others feeling that the reforms will give better protection for tenants against eviction.

Our consultation provided many comments regarding the potential impact licensing on homelessness, and also sought that s21 was properly considered by the Council. (See Appendix 2 to the Cabinet report)

6. Could any of the impacts you have identified be unlawful under the Equality Act 2010? Prohibited acts include direct and indirect discrimination, harassment, victimisation and failure to make a reasonable adjustment.

- Yes
 No

7. Please provide a brief summary of any research or engagement initiatives that have been carried out to formulate your proposal.

1. The 2011 Census provides valuable information regarding Brent’s population
2. Housing Stock Survey (Building Research Establishment 2019)
3. A Licensing consultation was undertaken with resident, tenants and businesses, landlords and managing agents, and other stakeholders including with neighbouring boroughs for between 10 June 2019 and 25 August 2019. The ‘Draft proposals’ to designate a discretionary scheme’ outlined the reasons and was made available on the Council website. During the consultation period, there were on-line survey questionnaires available to all target groups. Forums and face-to-face interviews and meetings were held with resident community and landlord groups and landlord and tenant representatives. The consultation was promoted through a variety of channels and was undertaken in line with the relevant Government guidance and informed by the equalities analysis screening.
4. Brent Council Open data store and Equalities profile 2015-19
5. Business intelligence research was undertaken with respect to levels of migration and levels of deprivation in Brent.

What did you find out from consultation or data analysis?

See above. The relevant findings from the research, consultation and data analysis have been presented in the individual sections for each protected characteristic, including socio-economic status.

Were the participants in any engagement initiatives representative of the people who will be affected by your proposal?

Yes. The resident’s forums and face-to-face interviews facilitated by consultants Opinion Research Services (ORS), were diverse by area, tenure, age, class and ethnicity – and so the meetings (taken together) were broadly representative of Brent residents

How did your findings and the wider evidence base inform the proposal?

The findings we used to determine the extent and scope of the designations, the type of properties to be included in the scheme, the fee and licence conditions set and the scheme objectives.

Conclusion

This analysis has concluded that, overall, it is anticipated that the extending and renewing of Selective and Additional Licensing is likely to bring about positive benefits to groups with protected characteristics, particularly those who are disadvantaged and who have little or no choice but having to rent in the private sector.

A key purpose of the scheme is to reduce antisocial behaviour, improve property conditions and reduce the level of deprivation, which will benefit residents across all protected characteristics and particularly more vulnerable groups. Vulnerable groups will also benefit from overall improvements in management standards due to the ability of the Council to better identify those properties that are being rented privately and the improved ability to enforce standards to the whole of the sector.

In particular, BAME groups, new migrants, families with young children, disabled residents and vulnerable adults will benefit from better enforcement of licence conditions and of the Housing Health and Safety Rating System standards. All groups will benefit from improvements in engagement, communication and signposting information between the council, landlords and tenants and other service providers. Information would relate to such matters as changes in the law affecting the PRS, energy efficiency measures and grants availability, information on local organisations and agencies which may be able to provide support.

The Equality Analysis has identified some potential for adverse impacts, particularly for lower income groups, if landlords decide to increase rents, young people, migrants, single parent tenants may be particularly affected by this. However, based on our experience of licensing over the past 5 years and that of other Councils who have introduced licensing, we believe this unintended outcome is very unlikely to materialise.

There is an increased threat of homelessness for some residents should landlords decide to withdraw from the private renting sector altogether. To mitigate this, the proposal tries to minimise the cost of licences, including offering a discount for certain accredited landlords and minimise bureaucracy.

It is proposed that a major publicity campaign is launched when Licensing is introduced to make tenants and landlords aware of their rights and obligations and what tenants can do if they are threatened with eviction. Specific actions are set out in more detail in the action plan below.

If Selective and Additional Licensing is renewed and extended, it is intended to enforce the scheme robustly; to closely monitor the situation on an on-going basis and carry out a major review after the scheme has been in place for a year. Overall, it is felt that the benefits to groups with protected characteristics of this initiative will outweigh any potential negative impacts and that there are robust measures put in place to mitigate against negative consequences.

Outcome of Analysis

The Equalities Analysis provides a good review of the analysis undertaken in 2017. It justifies the outcomes of the research then and allows an update, based on fresh consultation and updated Brent profiles. However, we think that there is no real

Make adjustments to remove barriers identified by the assessment and better advance equality – please refer to the action plan outlined below.

STAGE 3: ACTION PLANNING

This section details the responses and concerns raised as part of the consultation that relate to specific protected characteristics. It also outlines the proposed actions and initiatives that will be put forward to address these.

Equality Characteristic: Age

How Age was considered as part of the consultation process

We know that people in the 24-34 and 35-44 age groups are over-represented in the PRS in Brent. Older people, typically over 65s will be less able to use online technology. To ensure maximum engagement leaflets were sent to all households. All licensed landlords were contacted via mail outs. All email and social media channels were used to target all groups; this method would especially reach younger people who are very familiar with social media. The general marketing campaign across the borough provided information on how people of all ages could take part in the consultation process. Reference was made to the responses outcomes from the selective licensing 2016 survey and from that survey's evaluation report. A resident's survey was undertaken to achieve a broadly representative sample of face-to-face (F2F) interviews of residents of Brent, aged 16 and over.

Breakdown of Consultation Participants by Age

a) Residents – Face-to-face interviews

- Figure 1.1 shows how the F2F quota sampling met the target met the number of interviews required by age.

b) Questionnaire Survey

Table 1 compares the respondents' age groups with their respective borough averages. Overall the consultation was successful in reaching the tenant age group, landlords and older residents these being people most impacted by selective licensing.

- The figures for residents who are between 18-24 (14%) are perhaps not surprising as landlords are likely to be older and people of this age group are less likely to be householders and so will have less interest in licensing.
- The borough average of residents who are between 25-34 is 23 %. This age group is the second most likely to be renting in the private sector according to the 2011 census figures.
- The borough average of residents who are between 35-44 is 19%. From all the residents who took part in the consultation 20% were in this age group. From all the landlords who took part in the consultation 19% were in this age group. This age group is the most likely to be renting in the private sector.
- The borough average of residents who are between 45-54 is 16%. From all the residents who took part in the consultation 19% were in this age group. From all the landlords who took part in the consultation 29% were in this age group. The consultation exercise received a higher than average response from residents in this age range and a significantly higher response rate from landlords from this age group.
- The borough average of residents who are between 55-64 is 13%. From all the residents who took part in the consultation 2% were in this age group. From all the landlords who took part in the consultation, 24% were in this age group.
- The borough average of residents aged over 65+ is 15%. From all the residents who took part in the consultation 25% were in this age group. From all the landlords who took part in the consultation, 19% were in this age group.

<p>What is the proposal's impact on the equalities aims?</p> <p>The proposal will potentially benefit all age groups.</p> <p>Figures 1-3 and Table 1 show the private rented sector age by household member and responses age profile respectively. We expect the 25 – 44 age groups to directly benefit from better housing management standards. All properties that are granted a licence are expected to comply with the Housing Health and Safety Rating System standards (HHSRS) and the licensing conditions. This system includes reducing trips, slips and fall hazards which will be particularly relevant for older people who are more likely to suffer a serious injury from a fall. The HHSRS “most vulnerable group” considers the age demographic.</p> <p>According to Figure 3 high percentages of people living within the PRS are between 25 and 49 years of age making the PRS an important market for younger and more mobile people.’</p>	<p>What actions can be taken to remove or reduce the potential negative impacts that have been identified?</p> <p>If Licensing is renewed extended Brent Council will:</p> <ul style="list-style-type: none"> • Set up a residents focus groups • Licence fee will be set at a reasonable level to minimise the likelihood that the charges be passed onto tenants through increased rent • Continue training sessions for landlords on tenancy issues <p>What actions can be taken to enhance the potential positive impacts that have been identified?</p> <ul style="list-style-type: none"> • PHS will develop a PRS tenant's newsletter on our website • Promote the presence of the PHS webpage for landlords and tenants of private rented properties with information and updates • Promote our quarterly electronic landlord's newsletter to all landlords • Develop a tenant's charter which will include information on both rights and responsibilities for tenants • Signpost and give advice to landlords and tenants on the Well Being and other services which are available in the borough for vulnerable residents. <p>Explanation how any remaining negative impacts can be justified? N/A</p>
<p>Comments received from consultation relating to Age</p> <p>‘Council should spend more money on community projects i.e. youth clubs, community centres, parks etc. to deter problems in area”. (Free text comment from questionnaire)</p> <p>-----</p> <p>“There are rogue landlords who will rent their property to 18-20 people and make a lot of money and they may be contacted by the council every 6 years, but the fine is nothing compared to the money they've made. This scheme will not catch rogue landlords”. <i>Brent Civic Centre focus group</i></p> <p>Exemptions from licensing for student properties that are accredited and inspected under the approved Unipol National Codes (e.g. like in Bristol)</p>	<p>Council's response</p> <p>The council provides many projects for young people. The council will consider how best to publicise any available or newly created projects and initiatives to ensure that they are accessible to all.</p> <p>-----</p> <p>We recognise that some young people prefer to rent. However, a proportion of migrant other professionals and students live away from home are more likely to be occupying shared houses rather than single family households. Properties with less than 3 tenants will come under the scheme if licensing is introduced. Proportionate enforcement will be used to tackle overcrowded and sub-let properties.</p> <p>Certain student accommodation is already excluded from licensing, but HMO premises which are not run or managed by educational establishments will be inspected.</p>

Characteristic: Disability

How Disability was considered as part of the consultation process

The proportion of Brent residents who felt that they had good health increased from 70.2% in 2001 to 82.9% in 2011. Also from the Census 2011, 1 in 7 (14.5%) Brent residents considered that their health had a limiting impact on their day to day activities. This is comparable to the rate for London (14.2%) and 3.4% lower than the rate for England and Wales. In February 2014, 0.8% (1,650 people) Brent residents of working age - aged 16 to 64 - were claiming disability benefits (Nomis). This rate was only slightly lower than the rate for London, 0.9%. It is recognised and acknowledged that some perpetrators of anti-social behaviour have mental health problems. There is a link between mental health problems and drug/alcohol misuse for both perpetrators and complainants. Community safety departments in London boroughs are reporting that a significant proportion of ASB cases they are dealing with will have a mental health dimension. That is to say that either or both the complainant and alleged perpetrator have mental health support needs. (London Council's ASB and Mental Health Needs Jan 2014)

Breakdown of Consultation Participants by Disability

Table 2 is an analysis of the open questionnaire consultation results and indicates that 85% of Brent's residents and 90% of landlords did not have a long standing illness or disability. As a further comparison, the disability profile of consultation respondents (15%) is broadly reflective of the Borough average (14.5%). A below average response was received from all landlords who took part in the consultation, with 10% disclosing they had a disability or a long-term health condition. There is no disability borough average for landlords but it is noted that 19% of the landlords who took part in the consultation are in the 65+ age group.

Direct publicity methods were used in addition to the online questionnaire and web based consultation to ensure disabled housebound residents and landlords can have their say. The Brent Connect communications were for all wards and would reach residents in the Harlesden, Stonebridge, Dollis Hill, Welsh Harp, Fryent, Kensal Green, Barnhill etc.; wards which we know have the highest percentages of PRS households with disabilities or long-term health conditions.

What is the proposal's impact on the equalities aims?

Sources indicate that people suffering from a disability or mental health are more likely to be perpetrators or victims of ASB and live in poor housing conditions. People with disabilities may feel vulnerable to retaliatory practices which will mean that they may be less likely to complain to the Council.

Figure 2 shows the wards where a long term health problem or disability is highest. Table 2 in the disability section shows from all the residents who took part in the consultation 15% of residents and 10% of landlords had a long term health problem or disability. The Council will be able to more accurately identify properties where

What actions can be taken to remove or reduce the potential negative impacts that have been identified?

If Licensing is extended Brent Council will:

- Assist tenants with legal advice and signpost them to relevant support services available to them
- Provide information and advice on adaptations and grants available to fund these
- Provide communication with and support provided to tenants with Learning Disabilities, Mental Health needs, BSL users?
- Analyse the disability response by tenant age

What actions can be taken to enhance the potential positive impacts that have been identified?

<p>landlords would qualify for grants to benefit older residents with disabilities. As part of the licensing proposal it is intended to promote energy efficiency, for example, by requiring up to date EPCs and raising awareness of energy efficiency and how to reduce fuel poverty. We expect our older residents to benefit from this since national statistics show they are more likely to suffer from fuel poverty.</p>	<p>If Licensing is extended Brent Council will:</p> <ul style="list-style-type: none"> • Give advice to landlords and tenants on the services that are available across the borough for vulnerable residents. This will particularly benefit people with learning disabilities or dealing with substance/alcohol misuse or needing physical adaptations <p>Explanation how any remaining negative impacts can be justified? N/A</p>
<p>Comments from consultation relating to disability</p> <p>“A joined-up approach is required but there is little information on how, for example, services like adult social care will be impacted (given that many tenants will have issues with addiction or mental health), nor does the proposal consider possible link with homelessness”.</p> <p>“The council needs a strategy to deal with tenants who are persistent offenders, especially where the problems arise from complex needs (e.g. drug and alcohol addiction) that landlords are not qualified to address”. (NLA written submission)</p>	<p>Council's response</p> <ul style="list-style-type: none"> • The licensing conditions proposal sets out some actions which landlords must take to address ASB. We accept that where tenants have mental health issues that we must take this into consideration and additional support may be needed. • If Licensing is introduced, the scheme and this EA will be reviewed at least annually • We will continue to promote our information to landlords and tenants about disabled adaptations <p>These support mechanisms will need to be funded by other means and we will be looking at our relationship with internal teams e.g. Housing Needs, Adult Social Care and with our Legal Partners as well as voluntary agencies such as Brent CAB and Shelter UK</p>

Characteristic: Race
<p>How was race considered as part of the consultation process</p> <p>Brent was the first local authority in the UK to have a majority black, Asian and minority ethnic (BAME) population. In the 2011 Census, 63.7% of the population were BAME. By contrast, 14% of people in England and Wales and 40% of people in London were BAME. The largest ethnic groups in Brent were Asian: Indian or British Indian people (18.6% of Brent's population compared to 8.8% of the Outer London population) and White: English/ Welsh/ Scottish/ Northern Irish/ British people (18.0%). Brent had a higher proportion of the following ethnic groups than London and nationally: Black African people (7.8%), Black Caribbean people (7.6%), White Irish people (4%), Arab people (3.7%), White Polish people (2.9%) and White: Other Eastern European people (2.1%). 0.1% of Brent's population were White: Gypsy or Irish Traveller which was on par with London and national figures.</p> <p>A more recent look at the 2019 profiles is shown in Table 8 above – Population by ethnicity. Brent has a large Asian population: one third (35%) of residents are from Asian groups compared with 20% across London. One in six residents have Indian ethnicity – more than double the London average (17% vs. 7%) – and the fourth highest in London, and 18% are black. Other groups particularly well represented in Brent (compared with other areas in London) include the White Irish, Arab and Other Asian groups. In contrast, 38% are white, and just 16% of residents are White British.</p> <p>Under Age profile by ethnicity, Brent and London 2019;</p>

- 41% of people under 18 are black
- 46% of people are of mixed ethnic groups

Figure 3 shows how ethnicity groups are represented in the private rented sector in Brent. The multi-channelled communications strategy was designed to reach all groups, including ethnic minority groups and residents with English as a second language.

Results of the consultation relating to race

Table 6 shows the results of the consultation and compares the results with the borough averages for the race characteristic. The table shows that Asian residents (18%), Black residents (8%) and Black landlords (3%) responded to the consultation at a level that was well below the borough average for residents of 35% and 16% respectively. 66% of residents responding and 55% of landlords responding.

What is the proposal’s impact on the equalities aims?

Licensing has the potential to drive up standards which will benefit new / emerging communities and minority ethnic groups as they are over-presented in the PRS, and notably young people under 18s, large families and families with children under 5s. These groups are also likely to be vulnerable, on low income and may be attracted to properties which are in a poorer condition.

According to the 2016 Country of Birth profiles, Brent has, 44% born in the UK, 18% Europe, 23% Asia, 10% Africa and 4% in North/South & Central America.

Brent has a growing EU population comprising; Old EU 7.2% Accession Countries 5.9% Bulgaria and Romania 3.1% Other Europe 2.1%. “White other” Residents from EU accession countries are the most likely group to rent privately and so will benefit from improvements in this sector.

149 languages are spoken in Brent. In 1 in 5 households nobody speaks English as their main language. Licensing will help landlords in understanding their responsibilities and assist tenants in understanding their rights.

Considering the link between low pay and ethnicity in London, BAME groups, notably Black Africans (41%) and Black Pakistani or Bangladeshi (43%) are paid less than the Living Wage within ethnic groups. (Brent 2106 diversity profiles). The consultation responses suggest that landlords may seek to pass on the costs of licensing to their tenants in the form of rent increases. Where this occurs it may present an economic burden to ethnic tenants who are more likely to be on low pay.

What actions can be taken to remove or reduce the potential negative impacts that have been identified?

- The Landlord Focus Group to look at issues and support for vulnerable and other tenants. Particular efforts will be made to include BAME landlords.
- Review the enforcement policy to ensure that licensing enforcement is fair and proportionate.
- We will review and improve our landlord training provision
- Develop strategies to tackle Modern Day Slavery
- Analyse the impact of enforcement on landlords

What actions can be taken to enhance the potential positive impacts that have been identified?

Undertake compliance checks within the licence period. This would be helpful for people where English is not their main language to ensure that their tenancy management is adequate.

Please explain how any remaining negative impacts can be justified?

Licensing is likely to see an increase in enforcement action against BAME landlords. Landlord training and accreditation will continue to be made available to landlords. Enforcement will be in line with our private housing enforcement policy, where possible using civil penalties as an alternative prosecution.

Comments from consultation relating to race

There were no specific comments made in relation to race or ethnicity.

“Anecdotally, there are concerns that HMO rules are being circumvented because the occupants claim to be all be members of one household when they are clearly not”

Council's response

Our experience is that this situation arises when inspecting or dealing with licence applications in relation to ethnic tenants/landlords. Officers take particular case in establishing the relationship before deciding on action. Ultimately it may be for either party to prove their submission.

Characteristic: Socio-economic status

How was Socio-economic status considered as part of the consultation process (Source: Brent Responsible Growth Strategy (RGS): Economy (2018-2038)

Brent is one of the most diverse local authorities in the UK, with 329,000 people living in the borough. 45% of Brent residents were born outside of the UK and over 149 languages are spoken. Around 65% of residents are from Black, Asian and Minority Ethnic (BAME) backgrounds and Brent is home to 55,000 EU citizens. Brent has a lower level of economic activity and higher share of unemployment compared to the rest of London. These factors are especially prevalent among women, who are much more likely than men to drop out of the labour market, and instead stay at home to take care of the house and family.

In 2016,

- Approximately 222,000 people were aged between 16 and 64 years old, and 37,800 residents were over 65 years old; comparing these indicators for both the working age and elder population, Brent had the 9th largest such population amongst the London boroughs.
- Brent has the second largest working age non-UK population in London at 148,000 people, and the third largest EU working age population in London at 44,000.
- Approximately 74.3% of Brent's working age population were economically active, a lower percentage than Outer London, London and the UK.
- Unemployment rates among youth population in Brent were below London and Outer London averages, as was the proportion of 16-18-year-olds currently not in education, employment, or training (NEET).

In 2017,

- Approximately 92% of the working age population held some form of qualification, however, a lower proportion of Brent's population (33.8%) held a degree or a higher qualification than the proportion across London
- Elementary occupations are overrepresented in Brent accounting for over 14% of the working population, compared with only 10.5% of the UK working population and just under 9% of the London working population
- Median gross weekly earnings for full-time employees in Brent was £564, up 3.6% from 2016. This is still well below the average for Outer London (£631) and London (£654).

The consultation was designed to reach the widest target groups and to enable people on low incomes and those socially marginalised to be able to take part in the consultation. The consultation targeted businesses and business groups. The Brent 2016 survey asked question in relation to the socio-economic status. The response there were felt to be valid for 2019. Data from income, employment, education, health, crime, barriers to housing and living environment are all used to measure levels of deprivation.

Results of the 2016 consultation relating to Socio-economic status

The consultation asked certain questions relating to the Socio-economic status of the local area. The responses drawn were:

71.9% of residents and tenants tend to agree or strongly agree that licensing the PRS will help to preserve and improve the social and economic status of the local area

59.39% of landlords and managing agents responding to the consultation agree that tenants building up high levels of rent arrears is a problem

58.54% of landlords and managing agents responding to the consultation agree that the number of tenants claiming benefits is a problem

<p>What is the proposal's impact on the equalities aims?</p> <p>The setting of fees, licensing conditions and enforcement will have an economic impact on landlords</p> <p>In addition to having to pay for their property licences, landlords may need to carry out repairs to their rented properties as well as to take steps to improve their management skills.</p> <p>Tenants on low incomes and socio-economic status will especially benefit from improved property conditions thus affording a similar good standard of renting as people of better socio-economic status.</p> <p>Selective licensing should bring about more stable tenancies by being able to support tenants and landlords experiencing rent and debt problems and to reduce claims for possession, homelessness and mental distress.</p>	<p>What actions can be taken to remove or reduce the potential negative impacts that have been identified?</p> <p>The licence fee structure to be set to reduce the need for costs to be passed on to tenants Provide information within the PHS landlords newsletter on dealing with tenant rent arrears Signpost affected tenants to local organisations that can support them</p> <p>What actions can be taken to enhance the potential positive impacts that have been identified?</p> <p>Set up links with tenants and landlord advice representatives to identify and address their needs, particularly in relation to debt, rent arrears and homelessness</p> <p>Please explain how any remaining negative impacts can be justified? N/A</p>
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<p>Comments from consultation relating to Socio-economic status</p> <ul style="list-style-type: none"> • Proposal is just another money-making scheme/additional tax/increased cost/waste of money/money could be spent on improvements. Proposals affect profitability for landlords i.e. not making enough money/won't make it worthwhile/forcing landlords to sell etc., • Proposals will affect people on lower income i.e. increase people on benefits/increase homelessness • Proposed licensing fee is too high/should be lower/should be free • Some felt deprivation was a consequence of cuts to council services in recent years and therefore unlikely to be impacted by licensing • High levels of renting and people moving into area (e.g. Wembley) were said to have caused infrastructure issues that the Council would need to address 	<p>Council's response</p> <p>We note the comments about the impact of the fees and expenses on the landlords and the "knock on" effect on tenants especially those on low income or who are otherwise vulnerable. Judging from our experience with the existing licensing schemes in Brent and in other boroughs we believe it is very unlikely that licensing costs will be passed on the tenants. The licensing fee will be set at a level designed to cover the functions related to licensing in order to minimise the burden on landlords.</p> <p>Though some lenders may be reluctant to lend in licensable areas, there are several products available on the market for investor landlords. The Council will respond positively to mortgage lenders to support landlords</p>
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<ul style="list-style-type: none"> • There are wider issues of a local ‘mafia’ in Brent who use property developments to launder money • There needs to be adequate support for the homeless, victims of domestic violence and those who suffer poor mental health • Council should spend more money on community projects i.e. youth clubs, community centres, parks etc. to deter problems in area • Proposed licensing scheme will mean rental prices will go up/cost will be passed on to tenants/rent is too high already • Lenders see licensing as a risk to their investment because of the ASB stigma attached to licensed areas and this is seen as a risk to the property value and leads to mortgages being rejected • The scheme will lead to further displacement of problem tenants in Brent/London • The documentation provided fails to indicate that sufficient funding will be available to support the functions necessary to support licensing in cases involving rehousing, tenants with mental health issues and social exclusion • If the scheme works well it means that there will be better managed property which would be a benefit for the community but only if the money that is generated from this scheme actually goes towards the enforcement activity. If the money goes to other council expenses, then it won’t be useful. 	<p>If licensing is extended in Brent the council will be committed to reviewing the licensing scheme and fees at least once annually. The reviews will consider the equalities impact.</p> <p>The consultation exercise included 100 face-to-face interviews of resident who live in the 7 boroughs surrounding Brent. There were no concerns of displacement raised.</p> <p>The Council will encourage longer term tenancies</p> <p>We will respond to tenant complaints and signpost tenants for financial advice</p> <p>Our Landlord forum will include topics aimed to address the socio-economy e.g. taxation, fair renting, dealing with vulnerable tenants</p>
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EA Sign off

Role/Position	Name/signature	Date
EA author – PHS Licensing Manager	Tony Jemmott	September 2019
Head of Private Housing Service	Spencer Randolph	
Strategic Director of Community and Wellbeing	Phil Porter	