



## Equality Analysis for Selective Licensing

Name of service change or function	Selective Licensing Scheme 2022
Directorate/Service	Resident Services: Housing Private Housing Services - Licensing
EA undertaken by/contact:	Tony Jemmott – PHS Licensing Manager Ext 2377
Version/Date:	V1.TJ – March 2023
Date of next review (if applicable)	

### 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 Brent Equalities profile 2020-21, the 2021 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.

The current selective licensing scheme covering five wards was approved at the June 2017 Cabinet and came into force 1 June 2018. The scheme will expire on 30 April 2023. A wider scheme approved by the October 2019 cabinet was not confirmed by the Government and therefore could not be introduced. EA were undertaken for both proposals, but it is felt that the impact of covid and the cost-of-living crisis are likely to have influenced the responses and it would be useful to assess an impact in relation to Brent equalities population.

### Brent Equalities Objectives 2019-2023

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 four equality objectives in order to achieve key equalities outcomes for those who live and work in Brent:

1. Understand the barriers to equality experienced in Brent and act to remove them
2. Provide accessible information and services that are tailored to peoples' needs
3. Tackle hate, harassment and victimisation
4. Lead the way in encouraging diversity to flourish in Brent

More information about our equalities objectives and about how we implement these is found in Brent Council Equality Strategy 2019-2023. 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 reports 2019 and 2022.

The data in respect to equalities is considered in relation to licensing criteria of levels of anti-social behaviour (ASB) and poor property conditions, but we are also concerned about the other licensing criteria of high levels of migration, deprivation and crime. ASB and crime will include *hate crimes*. 2021 census data released so far will be used and where not released, there will be differences between these censuses information and data more recently collected by service areas. The EA has also been informed by the responses of our licensing public consultation carried out between 31 October 2022 to 23 January 2023.

Our most recent EA on licensing in the private rented sector was presented Brent Cabinet meeting dated 14 October 2019. We think that Census 2021 data would make minimum impact on the responses to the that EA. We will however be informed by the responses from our 2022-23 selective licensing public consultation to identify the potential/likely impact that our licensing scheme may have on people with protected characteristics, and to inform our action plan.

### **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 applied in two phases across all electoral wards in Brent, with the exception of the Wembley Park ward. 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 implement 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 and poor property conditions. Overall, if licensing is introduced, 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 local licensing conditions as a minimum letting standard in Brent
- Redefine how the service operates by shifting the emphasis from a customer complaint-led, reactive service
- Reduce the levels of anti-social behaviour in the borough and take action against those whose properties or tenants cause persistent ASB
- 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 selective licensing in Brent must have a licence. Applications must be made to the Council and shall be accompanied by a licence fee. Licensing conditions will be applied to licences and compliance requirements will be enforced by the council. The draft licensing conditions are provided as an Appendix to the cabinet report. These conditions include,

- 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.

Using a sample of properties that are known to have at least one serious housing hazard (Category 1, HHSRS) there are 10,108 private rented properties in Brent that are likely to have at least 1 serious housing hazard. PRS properties with serious hazards are distributed across the borough. Harlesden & Kensal Green (812) and Dollis Hill (796) have the highest number of properties with at least one Category 1 hazard.

ASB directly linked to PRS properties occurs across the borough. Over a 5-year period, **10, 398** ASB incidents have been recorded by the authority. Follow up investigations identify drug & alcohol related ASB (42%), noise (25%), Intimidation & harassment (14%), vehicle ASB (6%), other ASB (4%) graffiti & vandalism (3%) prostitution (2%) and rubbish and fly tipping (4%).

## **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 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 section 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***

Overall, 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. Potential impact on equalities characteristics and groups**

### **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 services will be removed, but we will be significantly upscaling the service offer to single-family vulnerable renters and proactively inspecting their homes. Renters will need access to further housing needs advice 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 the national PRS averages (21%) in the owner-occupied (16%) or social rented sector (13%). There is a strong correlation between poor quality housing and fuel poverty. Category 1 housing hazards are distributed across the borough, representing 18% of Brents PRS. 21 of 22 wards have Category 1 levels above the national average (12%).

According to the Equality Profile for Brent 2020-21, 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.

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.

Brent has a higher proportion in fuel poverty (17.3%) than the national average (13.8%) and the 4th highest number of private landlord possession claims in London, with 2,399 in 2019 (MoJ).

Brent has above average rents for London, with 53% of median earnings used to pay rent and the 12th highest numbers accepted as being homeless by London boroughs in 2017/18.

In terms of deprivation, Brent ranks as the 49th most deprived borough in England out of 317 (IMD 2019). Brent has a mixture of high and low deprivation wards with 16 of 22 wards having an aggregated IMD ranking below the national average.

### **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 improving poor housing conditions, for proactive inspections and for the elimination of discriminatory practices by landlords.

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

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

### **Recommend this EA for Full Analysis?**

No – A full EA was undertaken in 2019, this is still very much valid and as such, an update of the population profiles following the 2021 Census, understand how Covid-19 and the cost-of-living crisis might have adversely affected protected characteristics, and an update of the action plan is felt to be necessary.

**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**

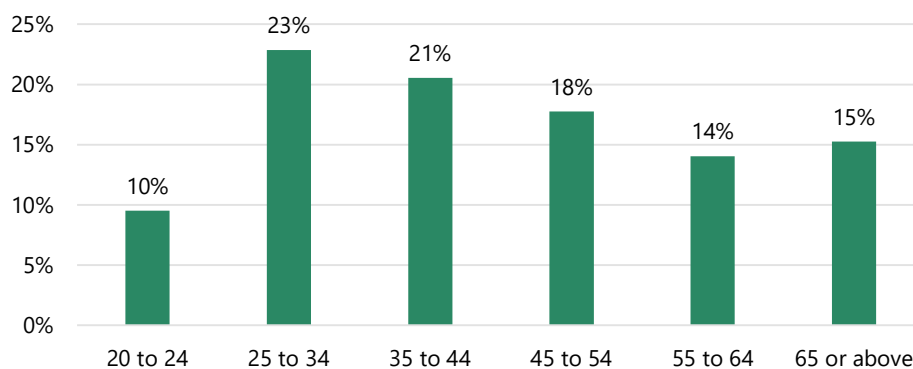
**5. What effects could your policy have on different equality groups and on cohesion and good relations?**

#### **5.1 Age (select all that apply)**

- Positive
- Neutral
- Negative

Figure 1 – Brent Age profile (Census 2021)

2021 Census - Usual resident population for Brent (Adult population\*)



\*Please note that the Census figures are the percentage of the adult population (percentage based on figures with ages 0-19 removed)

Brent's private rented sector has grown considerably in recent years, from 32% (2011) to 46% (2022) and this is expected to continue. There are 127,378 residential dwellings in Brent, 58,105 of which are rented privately.

In the next twenty years, the Brent population is expected to grow from currently 339,771 (*Source: Census 2021,*) the 5th most populous London borough to 395,800 in 2038 – a rise of 15% and an additional 56,000 residents. International migration has risen from a net inflow of 2,797 in 2011 to an inflow of 3,337 in 2021.

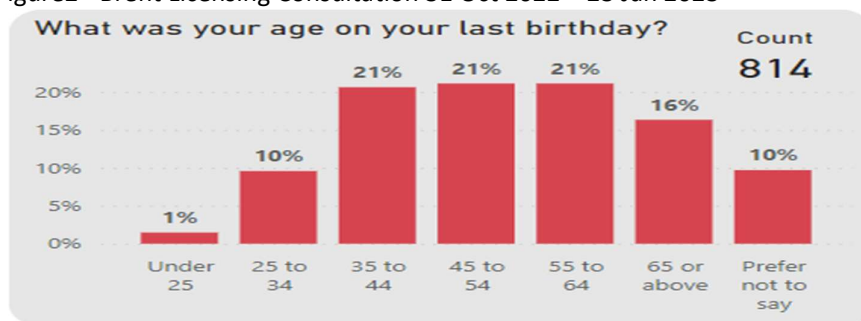
From Census 2021 in Brent, there has been an increase of 20.9% in people aged 65 years and over, an increase of 9.2% in people aged 15 to 64 years, and an increase of 2.8% in children aged under 15 years.

In common with other London Boroughs, Brent has a relatively young population. Between the last two censuses, the average (median) age of Brent increased by three years, from 32 to 35 years of age. This area had a similar average (median) age to London as a whole in 2021 (35 years) but a lower average (median) age than England (40 years).

The proposal to continue selective 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 mould, infections, reduction of falls as well as the requirements around excess cold, which can cause or exacerbate poor health.

2022 Consultation Questionnaire: Age Group what was your age on your last birthday?

Figure2 - Brent Licensing Consultation 31 Oct 2022 – 23 Jan 2023



The expectation is that residents, landlords and stakeholders 18 and over were likely to respond to the consultation. The age groups of 35 to 44, 45 to 55 and 55 to 64 were evenly represented by the respondents, with each group making up 21% of respondents.

The age groups of 55 to 64 were overrepresented in the consultation. The 25 to 34 age group is underrepresented at 10% compared to the Census figure of 23% for that age group in the London Borough of Brent.

We have noticed that under 34-year-olds were also underrepresented in the 2017 and 2019 EAs at 16%. Additional publicity was applied to the Wembley Park ward, where there is a high proportion of this age group, including students. The proposal to exclude the Wembley Park area from licensing is likely to have impacted on the response rate of these residents.

### **Gender of respondents**

Figure 3 - All Respondents

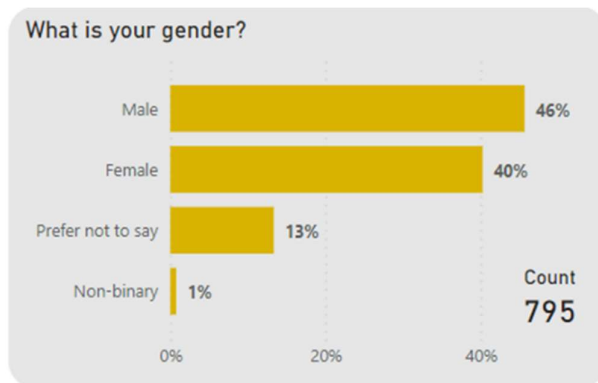
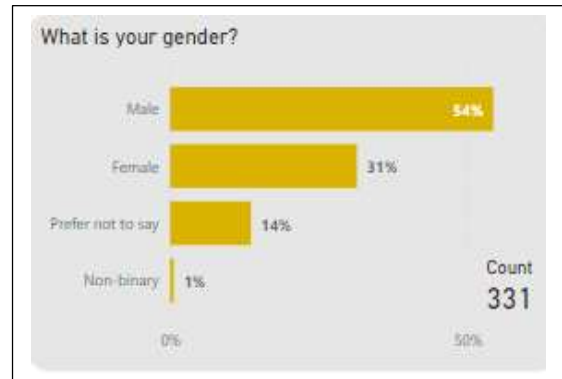


Figure 4 – Landlords and Agents



93% of respondents chose to respond to this question. The highest proportion of responses were from male respondents. A proportion (13%) of those who answered the question gave the response of “Prefer not to say”.

According to the 2021 Census, the population of Brent is 51% female and 49% male, therefore male respondents are slightly overrepresented, and female respondents are underrepresented in the consultation.

However, the 2022 survey results above show that adequate percentages of male (46%) and female (40%) of all respondents, and similarly for the resident group/local business group responded to the survey. As the group, the landlord response men (54%) and women (31%) show the greatest variation from the overall borough demographic for the gender characteristic. 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.

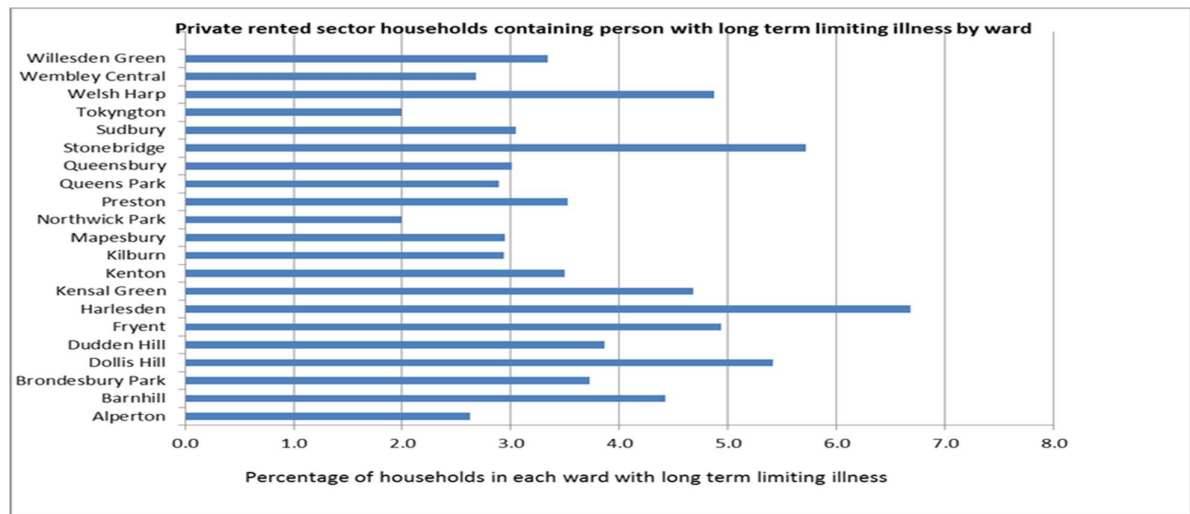
There was active female presence in the Brent Landlord forums 14 December 2022 and 11 January 2023, at the drop-in sessions, and at the tenants representative group meetings where the licensing proposals were consulted upon.

## 5.2 Disability (select all that apply)

- Positive
- Neutral
- Negative

The Equality Act defines disability as a physical or mental impairment that has a "substantial and long-term adverse effect" on the ability to carry out normal day-to-day activities. Figures from the latest census of England and Wales show 41,163 people in Brent said they had such an impairment as of March 2021 – 14.7% of the Brent's population. Of these people, 22,103 (7.6%) said their disability stopped them from carrying out regular activities 'a little', while 19,060 (7.1%) said it did so 'a lot'. The figures on disability in Brent's PRS is from 2011 census and based on the old ward boundaries.

### Please give details: Figure 5: Disability

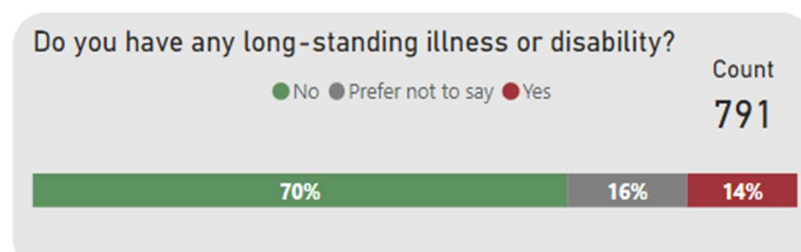


The above chart in Figure 5 details the disability profile in the PRS by ward, showing that there are higher proportions of PRS households comprising disabled tenants in Harlesden, Stonebridge and Dollis Hill wards.

### Long standing illness or disability of respondents

Respondents were also asked if they had a long-standing illness or disability. 93% of respondents chose to respond to this question. Figure 6 above shows that the disability profile of residents is broadly reflective of the borough disability profile of 14.5%.

Figure 6. Brent Licensing Consultation 31 Oct 22- 23 Jan 2023)





14% of the respondents to the question said they have a long-standing illness or disability, which is comparable with the combined figures of 7.1% of people in Brent who are disabled under the equalities act and their day-to-day activities are limited a lot, and the 7.6% of Brent who are disabled under the equalities act and their day-to-day activities are limited a little (figures from 2021 Census).

When 14% of all respondents is broken down by groups, landlords and agents (9%), other stakeholders (14%), and residents/local business at (19%). The residents/local business is higher than the London average (16%), but similar to the national average (20%).

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 needs of 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, personal hygiene and sanitary facilities, as well as the requirements around excess cold which can cause or exacerbate poor health. Disabled adaptations of not measures that private landlords are able or willing to undertake.

### 5.3 Sexual orientation and gender identity (*select all that apply*)

- Positive
- Neutral
- Negative

The 2021 census was the first to ask questions about sexual orientation and gender identity in Brent. While the census figures provide important new intelligence about Brent’s adult LGBTQ+ population, it is likely the figures didn’t capture the entire LGBTQ+ population as the questions were voluntary, directed towards over 16s, and had a high “not answered” rate.

Figure 7: Brent Population by sexual orientation, Census 2021

Population by sexual orientation, 2021				
% totals	Brent	London	England & Wales	Brent rank*
Population aged 16+	100.0%	100.0%	100.0%	
Straight or heterosexual	85.1%	86.2%	89.4%	312
All LGB+	3.2%	4.3%	3.2%	71
- Gay or Lesbian	1.3%	2.2%	1.5%	140
- Bisexual	1.3%	1.5%	1.3%	75
- Pansexual	0.5%	0.4%	0.2%	12
- Asexual	<0.1%	<0.1%	0.1%	284
- Queer	<0.1%	0.1%	<0.1%	57
- Other orientations	0.1%	<0.1%	<0.1%	2
Not answered	11.7%	9.5%	7.5%	4
% totals (base: those who answered the question only)				
Straight or Heterosexual	96.4%	95.3%	96.6%	270
All LGB+	3.6%	4.7%	3.4%	62

Source: 2021 census (Table TS079)

The percentage of adult residents who identified as LGB+ in Brent was the same as the average across England & Wales (3.2%), though lower than the London average (4.3%). Brent had the 4th highest non-response rate (11.7%) in England & Wales. Of those who answered the question, 3.6% of Brent residents identified as LGB+ compared with 4.7% across London, and 3.4% across England & Wales.

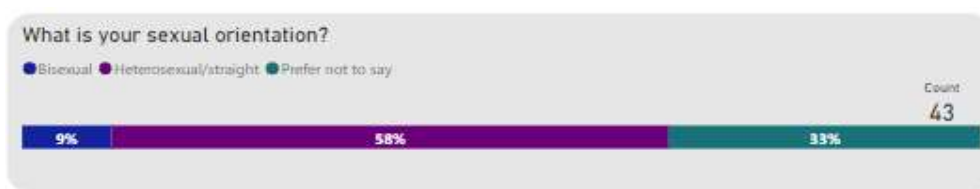
The 2020 GP Patient Survey found that 4% of Brent adults surveyed identified as Lesbian, Gay, Bisexual (or 'Other'). The GP Survey is one of the few sources that provides Borough level data and tends to provide slightly higher estimates compared with other sources.

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**

Respondents were also asked their sexual orientation. 89% of respondents chose to answer this question. The largest proportion of responses were from people who identified as heterosexual / straight. A large portion of respondents, 32%, gave the responses “prefer not to say”.

**Figure 8: What is your sexual orientation**



For clarity, the consultation survey respondents responses were:

<b>Sexual orientation</b>	<b>Percentage (Consultation response)</b>
Straight or Heterosexual	61.4%
Prefer not to say	32.4%
Gay man	2.5%
Bisexual	2.2%
Lesbian	0.8%
Pansexual	0.1%
Asexual	0.1%
Queer	0.1%
Irrelevant / none of your business	0.2%

When compared with Figure 7, straight / heterosexual respondents are underrepresented by the consultation responses (61% compared to 85% according to 2021 Census). Gay and lesbian respondents were slightly over presented, as were bisexual respondents.

### **Gender Identity**

Relative to other areas, Brent has a large transgender population: 1.3% of residents in Brent identified as transgender, compared with 0.9% across London and 0.5% across England & Wales. Brent had the second highest rate in England & Wales, after Newham (1.5%). Brent had the highest non-response rate in England & Wales. In Brent, 10.1% of respondents chose not to answer compared with 7.9% across London, and 6.0% nationally. Of those who answered the

question, 1.5% of Brent respondents identified as transgender compared with 1.0% across London, and 0.6% across England & Wales.

### Gender reassignment in Brent

Those identifying as transgender are represented in all age groups though in general, the transgender population has a slightly younger age profile when compared to the population generally. The percentage who were transgender was highest among the 35-44 age group (1.7%) and lowest among those aged 75 and over (0.6%). Nationally, the relationship between age and trans identity was more pronounced than in Brent, with the highest rates among the 16-24 year olds. By sex, those who identified as male were more likely to identify as transgender than those who answered female to the census sex question (1.5% of males vs. 1.1% of females). The Brent transgender population comprised 55.4% males and 44.6% females. Nationally, the ratio was around 50:50 (50.1% male and 49.9% female).

Figure 9: Brent Adult population by gender identity, census 2021

Adult population by gender identity, 2021				
% total	Brent	London	England & Wales	Brent rank*
<b>Population aged 16+</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	
Gender identity the same as sex at birth	88.6%	91.2%	93.5%	330
Gender identity different from sex at birth	1.3%	0.9%	0.5%	2
- No specific identity given	0.7%	0.5%	0.2%	2
- Trans woman	0.2%	0.2%	0.1%	3
- Trans man	0.3%	0.2%	0.1%	1
- Non-binary	0.1%	0.1%	0.1%	114
- Other identities	<0.1%	<0.1%	<0.1%	49
Not answered	10.1%	7.9%	6.0%	1
% totals (base: those who answered the question only)				
Gender identity the same as sex at birth	98.5%	99.0%	99.4%	330
Gender identity different from sex at birth	1.5%	1.0%	0.6%	2

Source: 2021 census (Table TS070)

### 5.4 Ethnic Origin

According to the latest 2021 census, the population in Brent is predominantly white (34.6%), with non-white minorities representing the remaining 65.4% of the population. Asian people were the largest minority group in Brent. In England more broadly the portion of the population that is white is 81%. 10% are Asian and 4% are Black.

Population by race in Brent, 2021 census

- White - 117,701 people or 34.6%
- Asian - 111,515 people or 32.8%
- Black - 59,495 people or 17.5%
- Other - 33,861 people or 10.0%
- Mixed - 17,249 people or 5.1%

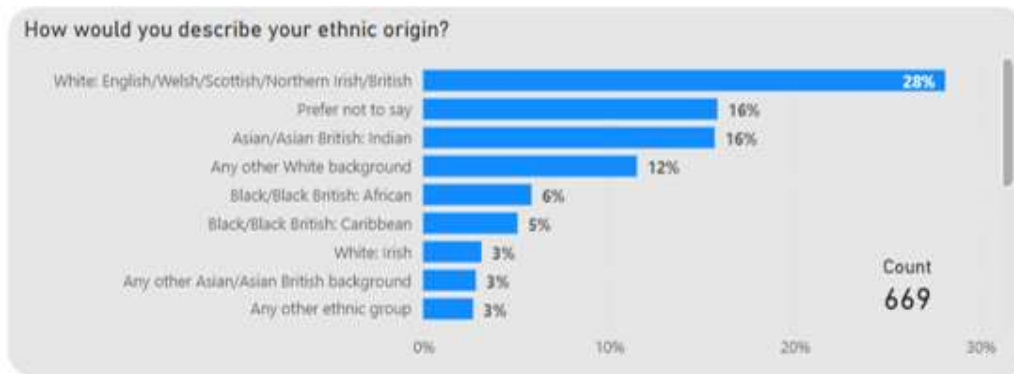
#### **Results of the 2022 consultation relating to ethnic origin**

Respondents were asked “How would you describe your ethnic origin?”. Figure 10, overall, 669 (78%) of respondents chose to respond to this question. The largest group were people of White

British ethnic origin (28%), which is above the borough's demographic figure of 15.2%. However, any other white background (12%) is slightly under the borough figure of 15.9%. The proportion of respondents of Asian/Asian British: Indian ethnic origin (16%) is slightly below the borough figure of 19.5%.

The proportion of black / black British: African (6% of respondents vs 9.1% of the borough), black / black British: Caribbean (5% of respondents vs 6.3 of the borough), Asian / Asian British: Pakistani (2% of respondents vs 4.5% of the borough) and other Asian / Asian British background (3% of respondents vs 7.2% of the borough) are below the borough figures.

Figure 10: Ethnic origin - all respondents



Figures 10.1 and 10.2 gives the residents and landlord groups responses which when compared with census 2021 are generally over the borough figures for Asian and black group types.

Figure 10.1 Ethnic origin - residents/local businesses

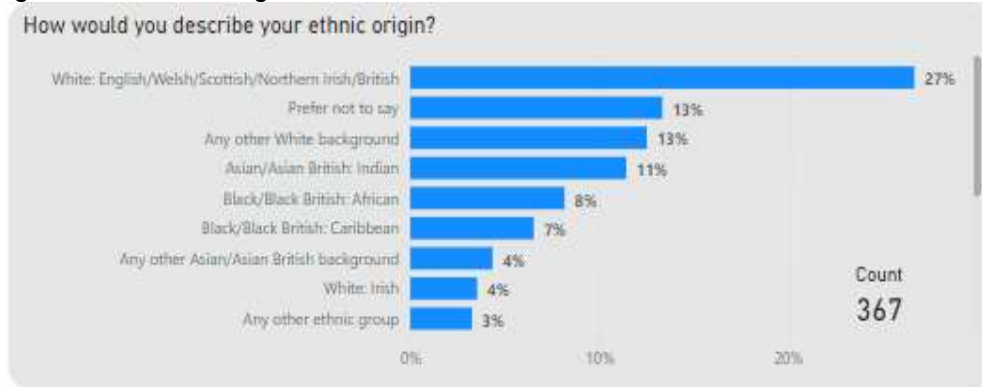
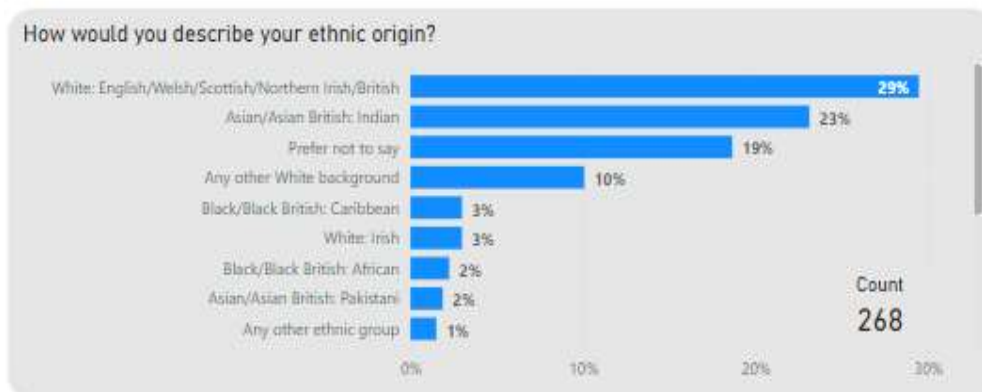


Figure 10.2 Ethnic origin – landlords and managing agents



### 5.5 Religion or belief (select all that apply)

- Positive
- Neutral
- Negative

According to the latest 2021 census, the most populous religious group within Brent is Christians, accounting for 38.8% of the population. Brent has a Muslim population of 72,574 which is 21.4% of the population. Compared to England as a whole, in England circa 46% of the population is Christian, 7% is Muslim, 2% is Hindu, and Buddhists, Sikhs and Jews each is around 1%. The remainder is split between people with no religion and those who decided not to identify a religion.

#### Religious groups in Brent, 2021 census

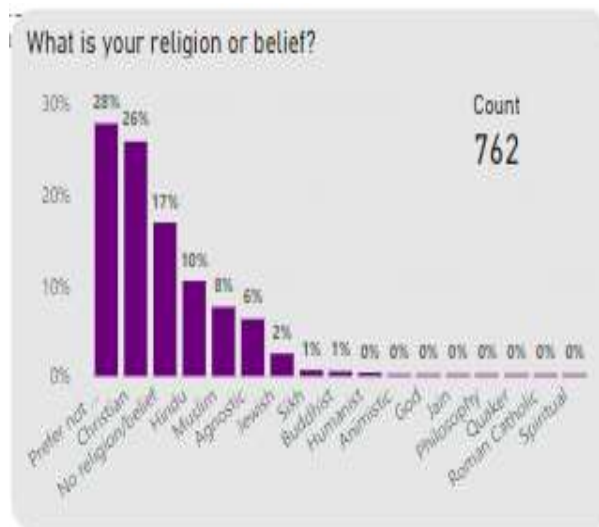
- Christian - 131,916 people or 38.8%
- Buddhist - 3,117 people or 0.9%
- Hindu - 52,877 people or 15.6%
- Jewish - 3,723 people or 1.1%
- Muslim - 72,575 people or 21.4%
- Sikh - 1,530 people or 0.5%
- Other - 74,084 people or 21.8%

**Figure 11: What is your religion or belief? (Grouped Responses)**

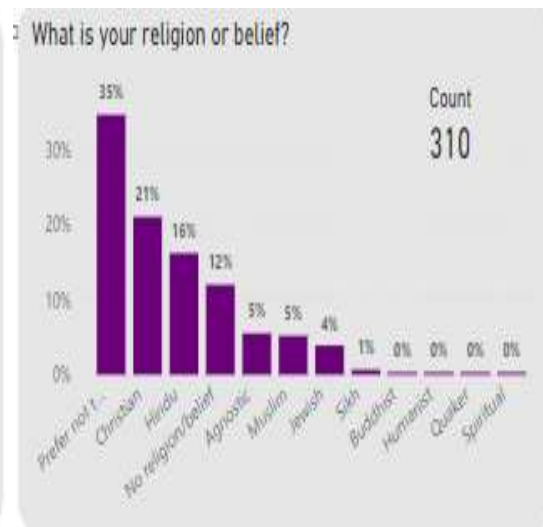
From Figure 11, overall, Christian, Hindu and Muslim (Fig 11.1) seem to be well represented in the survey compared to the Borough profile. Christian and Muslim landlords (Fig 11.2) also seem to be under-represented, while Hindu landlords match the borough profile figure. It should be noted, however, 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.

#### Results of the 2022 consultation survey regarding religion



**Figure 11.1 - All respondents**



**Figure 11.2 - Landlord and Managing Agents**

## 5.6 Other (please specify)

### Socio-economic disadvantage

- Positive
- Neutral
- Negative

### Please give details:

#### *Socio-economic status of the local area*

**Deprivation:** The Indices of Deprivation 2019 (ID2019) are the primary measure of deprivation for small areas or Lower layer Super Output Areas (LSOAs) in England. The indices were published by the Ministry of Housing, Communities & Local Government (MHCLG) in September 2019 and replace the 2015 indices.

- Brent ranks (Rank of average rank) as the 49th most deprived borough in England out of 317. Brent has a mixture of high and low deprivation wards. 16 of 22 wards have aggregated IMD rankings below the national average.
- 5% of the LSOAs in Brent are in the most deprived 10% nationally, compared to 8% of LSOAs in 2015.
- The most highly deprived areas in the borough are concentrated in Stonebridge and Harlesden. Brent has one LSOA that is within the 5% most deprived in England, and this is located in north Stonebridge.
- 19% of the borough's 173 LSOAs are in the most deprived 20% of LSOAs in England.
- The least deprived areas in the borough are located in the northwest, in the wards of Kenton and Northwick Park.

The Barriers to Housing and Services Domain measures the physical and financial accessibility of housing and local services. The borough is highly deprived on this domain.

- Stonebridge ward is ranked as second most deprived ward in England.
- 12 of the 21 wards in Brent are in the 5% most deprived wards in the country
- Other London boroughs are also ranked in the most deprived nationally on this domain. On the average score measure, Brent is ranked third most deprived nationally, below Newham and Barking & Dagenham.

**Fuel poverty:** A household is considered to be fuel poor if they have required fuel costs that are above average (the national median level), and, were they to spend that amount, they would be left with a residual income below the official poverty line. The fuel poverty score was produced by the Department for Business, Energy & Industrial Strategy using 2019 data and published in 2021. Over the next 12 months these figures are likely to change significantly as a result of acute fuel price increases. Notwithstanding, Brent has a higher proportion in fuel poverty (17.3%) than the national average (13.8%).

**The Minimum Energy Efficiency Standard (MEES):** The MEES regulations came into force in England and Wales on 1 April 2018. The regulation applies to PRS properties and mandates that all dwellings must have an EPC rating of E and above to be compliant. It has been calculated using the matched addresses that 12.2% of PRS properties in Brent have an E, F, and G rating. Extrapolated to the entire PRS, 755 PRS properties are likely to fail the MEES statutory requirement.

The Government has pledged to reduce energy consumption from building by 15% by 2030, with aspirations for properties to have a minimum EPC rating of C by 2025. Under current regulations

landlords are not expected to spend more than £3,500 on upgrades to meet the requirements of a rating of E. However, proposed changes could see all rental properties requiring an EPC of C by 2028, and a potential increase to this cap of £10,000, meaning landlords would be required to spend more to meet minimum requirements.

**Rents and affordability:** Considering the average (median) earnings for one-bedroom dwellings as a proportion of median rents. Brent has above average rents for London, with 53% of median earnings used to pay rent. The London average is 47.9%. (VAO Statistics PRS Market 2018)

**Residential property crime (burglary):** Between April 2021 and March 2022, 1,534 burglaries were reported to the Metropolitan Police across London, averaging (mean) 47.9 per London borough. 65 burglaries (4<sup>th</sup> highest) were reported in Brent for the same period. (MPS Crime data 2022)

## **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 22 July 2022, 3,073 households are in Bands A-C minus on the Housing Register (those who meet the criteria of the Council's Allocation Scheme to be awarded reasonable preference on the Housing Register). Brent has had one of the largest temporary accommodation portfolios in the country for many years. As of 31st August 2022, Brent Council reports to have 1,703 households in Temporary Accommodation, a total reduction of 27% since 2018. In 2021/22, 283 individuals were recorded rough sleeping in Brent, a 24% decrease on figures from 2020/21. Brent is taking a range of actions to address demand arising from homelessness and reduce reliance on temporary accommodation.

The Draft London Plan (2017) sets a new target of 29,150 additional homes to be delivered in Brent over the period 2019/20 to 2028/29, an average of 2,915 per annum. This is almost double the 2015 target of 1525 homes per annum. Of these new homes, The Council's Housing Strategy aims to facilitate the delivery of 1,000 new affordable homes each year from all possible sources with 70% for affordable rent and 30% for affordable homeownership. This includes the Council's own development programme which will deliver 817 new council homes. The Greater London Authority report that Registered Providers who are receiving grant will have 3,330 units started on site in the Brent by 2020. It is important to note, 841 will be Social Rent, London Affordable Rent or Affordable Rent.

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. The UC caseload in Brent, at 31<sup>st</sup> March, was 5,849, an increase of 3,674 on November. (This will include our former HB cases plus UC claims from non-dependants etc., with no rent liability.). 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.

Brent has the 4th highest number of private landlord possession claims in London, with 2,399 in 20197 (Figure 6). The average number of claims for London boroughs during this period was 1,224. (Source MOJ 2019)

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 through 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.

#### Findings from the Brent Consultation 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.

One of the proposed changes set out in the Renters Reform Bill, and reaffirmed in The [A Fairer Private Rented Sector White Paper](#) is to abolish section 21 eviction notices. The abolition of section 21 would put an end to so-called “no-fault evictions”, and instead transition assured and assured shorthold tenancies to periodic tenancies, as part of the on-going project to create longer tenancies. Once section 21 is abolished the government has also proposed strengthening the grounds for possession under section 8 of the Housing Act 1988.

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 views sought that s21 was properly considered by the Council.

#### **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 2021 Census provides valuable information regarding Brent’s population
2. A Licensing consultation was undertaken with resident, tenants and businesses, landlords and managing agents, and other stakeholders including with neighbouring boroughs for between 31 October 2022 and 23 January 2023.
3. Brent Council Open datasets 2021
4. Private Rented Sector: Housing Stock Condition and Stressors Report, Metastreet, October 2022
5. English Housing Condition Survey: Headline Report 2021
6. Housing Act 2004, HHSRS Operating Guidance 2006
7. Cost of poor housing, BRE Group 2021



## **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 respondents to the questionnaire and those attending the forums and drop-in sessions were diverse by area, tenure, age 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 assist in informing the scheme objectives.

## **Conclusion**

This analysis has concluded that, overall, it is anticipated that 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.

The key purpose of the scheme is to reduce antisocial behaviour and improve property conditions. Addressing these criteria will have an impact on reducing 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 across the sector.

In particular, BAME groups, 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, lone parent households' 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 do not believe that licensing in itself should result in the need for landlords to increase rents.

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 to 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 licensing is continued, it is intended to enforce the scheme robustly; to closely monitor the situation on an on-going basis and carry out periodic reviews. Overall, it is felt that the benefits

to groups with protected characteristics of this initiative will outweigh any potential negative impact.

### **Outcome of Analysis**

The Equalities Analysis has allowed for an update of our action plan based on the fresh consultation 2022/23 and census 2021 Brent profiles. However, we do not envisage any significant change to the impact of the proposals on the “*Equalities*” characteristics of people in Brent. The responses and concerns raised in the 2022/23 consultation as well as the action and initiatives to address them are provided in the Stage 3: Action Planning tables 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.

#### Consultation Participants by Age

Figure 2 compares the respondents' age groups with their respective borough averages. Overall, the consultation was successful in reaching the landlords and residents groups, these being people most impacted by selective licensing.

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

The proposal will potentially benefit all age groups. 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.

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

- Licensing will work with landlords and liaise with Temporary Accommodation teams

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

- PHS will develop a PRS tenant's newsletter on our website
- Report on category 1 hazards where the property is occupied by most vulnerable person (MVP)

#### Explanation how any remaining negative impacts can be justified? N/A

#### Comments received from consultation relating to Age

Landlord may have difficulties accepting single homeless and young vulnerable people tenants because of some licence conditions e.g., references, ASB history

#### Council's response

Licensing will work with landlords and liaise with Temporary Accommodation teams

**Characteristic: Disability**

**How Disability was considered as part of the consultation process**

The consultation ensured that information was available online and that people to call up the licensing team to get help with request. Information was available in accessible format. Drop-in sessions, Zoom and MS Teams were used to engage with customers.

**Consultation Participants by Disability**

The open questionnaire consultation results give the results regarding long-standing illness or disability.

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

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 5 shows the wards where a long-term health problem or disability is highest. From the consultation 19% of residents and 9% of landlords had a long-term health problem or disability. The Council will be able to more accurately identify properties where 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.

**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,
- Analyse the disability response by tenant age

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

If Licensing is extended Brent Council will:

- 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

**Explanation how any remaining negative impacts can be justified? N/A**

**Comments from consultation relating to disability**

“Landlords are not the best equipped to deal with anti-social behaviour and certainly do not have the skills or capacity to deal with some tenants’ problems such as mental health or drug and alcohol misuse”. (PropertyMark)

**Council's response**

- 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

	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
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<b>Characteristic: Race</b>
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**How was race considered as part of the consultation process**

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 Licensing staff at the drop-in sessions and on telephone speak a variety of languages spoken in Brent.

**Results of the consultation relating to race**

The results of the consultation compare favourably with the borough averages for the race characteristic. The table shows that white and BAME groups responded to the consultation. A significant proportion of landlords and managing agents are of ethnic origin

<p><b>What is the proposal's impact on the equalities aims?</b></p> <p>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.</p> <p>52% of Brent population were born outside the UK, the highest in England and Wales JSNA 2019-20</p>	<p><b>What actions can be taken to remove or reduce the potential negative impacts that have been identified?</b></p> <ul style="list-style-type: none"> <li>• The Landlord Focus Group to look at issues and support for vulnerable and other tenants. Particular efforts will be made to include BAME landlords.</li> <li>• We will review and improve our landlord training provision</li> </ul>
	<p><b>What actions can be taken to enhance the potential positive impacts that have been identified?</b></p> <p>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.</p>

<p>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.</p>	<p><b>Please explain how any remaining negative impacts can be justified?</b></p> <p>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.</p>
<p><b>Comments from consultation relating to race</b></p> <p>There were no specific comments made in relation to race or ethnicity.</p>	<p><b>Council's response</b></p>

<p align="center"><b>Characteristic: Socio-economic status</b></p>	
<p><b>How was Socio-economic status considered as part of the consultation process (Source: Brent Responsible Growth Strategy (RGS): Economy (2018-2038)</b></p> <p>Brent is one of the most diverse local authorities in the UK, Brent has the second largest working age non-UK population in London. 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. Data from income, employment, education, health, crime, barriers to housing and living environment are all used to measure levels of deprivation.</p> <p><b>Results of the 2016 consultation relating to Socio-economic status</b></p> <p>The consultation asked certain questions relating to the Socio-economic status of the local area. The responses drawn were:</p> <p>Numbers of respondents said that deprivation and inequalities would get worse if licensing was stopped</p>	
<p><b>What is the proposal's impact on the equalities aims?</b></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><b>What actions can be taken to remove or reduce the potential negative impacts that have been identified?</b></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><b>What actions can be taken to enhance the potential positive impacts that have been identified?</b></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>Energy efficiency regulation could see landlords, many of whom are of ethnic origin, where the consultation shows 60% own and manage their own properties, and on average have less than two properties, will find it hard to meet the requirements</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><b>Please explain how any remaining negative impacts can be justified.</b></p> <p>Proposed energy efficiency changes could see all rental properties requiring an EPC of C by 2028, and a potential increase to the expenditure cap from the current £3,500 to £10,000, meaning landlords would be required to spend more to meet minimum requirements.</p>
<p><b>Comments from consultation relating to Socio-economic status</b></p> <ul style="list-style-type: none"> <li>• Extra costs incurred by landlords will lead to higher rents</li> <li>• The PRS scheme treats both responsible and rogue landlords in the same way. Both these notions received around a fifth of negative comments from landlords. “, any cost to landlords is passed to the end users, who are tenants.”</li> <li>• “Unnecessary burden on the landlord which WILL be passed onto tenants.”</li> <li>• “Deal with problem landlords and not have one size fits all policy and be more flexible with responsible landlords.” The licensing scheme does nothing for decent landlords.”</li> <li>• Landlords also expressed some concern that PRS fees would incentivise them to sell their properties, resulting in reduced housing stock in Brent as a whole.</li> <li>• “The higher the fees are the more landlords will just quit the market.”</li> <li>• “If the fee gets too high the landlords will leave the borough.”</li> <li>• “I would only be in favour of selective licensing in Brent if I really thought it targeted rogue landlords and had the resources to be properly enforced.”</li> <li>•</li> <li>• For residents, the top reason for negative responses is the perception that PRS licensing will increase rents. Almost a third of negative comments from residents mentioned this.</li> <li>• “Licensing only has the effect of pushing up rents and property prices.”</li> <li>• “You will push landlords out of renting resulting in fewer properties which will result in higher rents.”</li> <li>• “I don't believe it's time to do more licensing which in the end will be reflected in the tenant's rent.”</li> </ul>	<p><b>Council's response</b></p> <p>We note the comments about the impact of the fees and expenses on the landlords and suggested “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> <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 Council will comply with rental reforms and guidance in relation to s21 and section 8 when this becomes law</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>

<ul style="list-style-type: none"> <li>• Next comes the idea that PRS licensing is a money-making scheme for Brent. Over 20% of resident comments mentioned this.</li> <li>• “Kensal does not have an anti-social problem and I view this as a method of raising more funds in an illegitimate manner.”</li> <li>• “Licences are purely being introduced to raise revenue for the Council.”</li> <li>• “Licensing appears to be a money-making scheme for Brent.”</li> <li>• “Be careful not to price good landlords out of Brent. Good landlords have a much lower profit margin. Bad landlords charge us tenants the same rent but with much worse upkeep and responsiveness to repairs.”</li> <li>• “Licensing is not necessary, it is just a money making exercise.”</li> <li>• “A blanket rule of selective licensing for every PRS property will increase the cost for landlords therefore the rent will go up which is already high, this can lead to homelessness.”</li> </ul> <p>Many of the respondents had suggestions about how to improve the scheme and the private rented sector in Brent in general. These focused on three main areas:</p> <ul style="list-style-type: none"> <li>• Lowering the licensing fee</li> <li>• Better enforcement of current legislation</li> <li>• The council should increase its own housebuilding</li> </ul>	
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**Draft EA Sign off**

Role/Position	Name/signature	Date
EA author – PHS Licensing Manager	Tony Jemmott	March 2022
Head of Private Housing Service	Spencer Randolph	March 2022
Operational Director Housing	Hakeem Osinaike	March 2022
Strategic Lead Equalities	Angela Chaudhry	March 2022