

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Additional HMO Licensing Scheme 2025
DEPARTMENT:	Residents and Housing Services
TEAM:	Private Housing Services
LEAD OFFICER:	Spencer Randolph, Director of Housing Services Email: Spencer.Randolph@brent.gov.uk
DATE:	24 September 2025

NB: Please ensure you have read the accompanying EA guidance and instructions in full.

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

The Council proposes to introduce a new borough-wide additional HMO licensing scheme that would come into force on 02 February 2026.

In February 2020, the Council introduced a boroughwide additional HMO licensing scheme to ensure safety standards for tenants living in smaller houses in multiple occupation (HMOs), this scheme ended in January 2025. This scheme followed a previous scheme, which was introduced in January 2015 and expired in 2020. The schemes covered HMOs that are occupied by three or four people living in two or more households. The schemes excluded those licensed through the mandatory HMO licensing scheme.

Property licensing provides an additional legislative framework to regulate conditions and practices in the private rented sector. Through conditions attached to granted property licences, licence holders must comply with a set of conditions relating to the letting and management of their privately rented homes.

HMOs present a higher level of risk to occupants, and this is elevated where properties are poorly managed. The current additional HMO licensing scheme has helped us improve the standards and management practices of many HMOs across the borough. However, the evidence shows that there is a significant number of properties that are still substandard and potentially dangerous. These HMOs pose a risk to the health, safety, and wellbeing of tenants, cause problems for neighbours, and require significant intervention from Council enforcement services.

While we have seen significant improvements from the scheme that ended in January 2025, we believe that a further additional HMO licensing scheme is necessary to continue the work we have achieved and to maintain and improve the management of HMOs in the borough.

Since the introduction of the additional HMO licensing scheme, the Council has granted more than 2500 licences, meaning that over 5000 households are living in safer, more

secure accommodation as a result. The introduction of a new additional HMO licensing scheme would allow for seamless continuity of the work already carried out in regulating, improving housing conditions and promoting better management standards within HMOs.

2. Who may be affected by this policy or proposal?

The main group of people affected by the proposal are the tenants of privately rented homes in the borough, which make up about 36% of Brent's households. The overall impacts of the additional HMO licensing scheme, should it be introduced, should provide improved living conditions for private tenants, specifically those living in HMOs, and wider benefits for the borough's other residents.

2021 Census data remains the most up-to-date available data to assess the numbers and proportions of people of different sexes, ages, disabilities, races and religion/beliefs who live in rented accommodation in Brent and are most likely to be impacted upon by the introduction of this licensing scheme. Unfortunately, the categorisation of census variables makes it difficult to separate out those living in private rented accommodation from those who are living rent free. However, the numbers living rent-free are very small and unlikely to have a significant impact on the figures.

Data from the 2021 census indicates that people who rent from a private landlord in Brent are broadly representative of Brent's population, although some groups are over or underrepresented. Where these groups overlap with the protected characteristics described in the Equality Act 2010, the comparative data is outlined in Section 3 – Equality Analysis.

Other persons/groups affected by the proposals are:

- Other residents of the borough who do not rent from a private landlord
- Landlords/agents of the privately rented homes
- Residents of homes immediately outside the proposed licensing scheme designation areas

The service does not have access to data regarding the prevalence of one or more protected characteristics of landlords and agents who specifically let properties in Brent. However, according to the English Private Landlords Survey 2024¹, the national profile of landlords includes the following characteristics:

- Landlords are as likely to be male as female, though male landlords tend to have larger portfolios than female landlords
- The median age of individual landlords is 59 years old. This is older than the general population. Almost two thirds (64%) of landlords are aged 55 or older
- The ethnicity of landlords broadly reflects that of the population as a whole, though Census 2021 data shows a smaller proportion of the wider population identified as white (81% compared to landlords at 87%)
- Around one in five (21%) of landlords had a total annual gross income of £100,000 or more
- Looking at both income from rent and income from other sources, on average landlords received nearly half (50%) of their total income from rental property

¹ [English Private Landlord Survey 2024: main report - GOV.UK](#)

The licensing scheme, if agreed and introduced, would place the same obligations on all landlords and agents who let and manage HMO properties in Brent.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

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.

As part of the decision making process to introduce a new additional HMO licensing scheme, the Council undertook a public consultation which ran for 13 weeks from 10 March 2025 until 10 June 2025 and utilised a variety of methods to reach and seek opinions from all those likely to be affected by the council's proposals, both within and outside of the borough.

This EA has taken account of the consultation process, the information gathered through that process and assessed the impact that the recommendations could have on different protected groups and, where possible, identified methods for mitigating or avoiding any adverse impact on those groups.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	Impact Positive	Impact Neutral/None	Impact Negative
Age	X		
Sex	X		
Race	X		
Disability *	X		
Sexual orientation	X		
Gender reassignment	X		
Religion or belief	X		
Pregnancy or maternity	X		
Marriage	X		

5. Please complete **each row** of the checklist with an “X”.

Screening Checklist

	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?	X	
Would the policy or proposal change or remove services used by vulnerable groups of people?	X	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	X	

If you have answered YES to ANY of the above, then proceed to section B.

If you have answered NO to ALL of the above, then proceed straight to section D.

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis.
If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

This EA is informed by the responses from the consultation process, 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.

The latest census data and reports, is available **on the [Census page on open data](#)**. 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.

More information about our equalities objectives and about how we implement these is found in Brent Council Equity, Diversity, and Inclusion Strategy 2024 – 2028. [Equality and diversity | Brent Council](#). We have gathered enviro-crime, antisocial behaviour, and property data from our council’s recording and external databases, data from the latest English Housing Condition Survey reports and data from a Brent commissioned Housing Stock Survey report 2024.

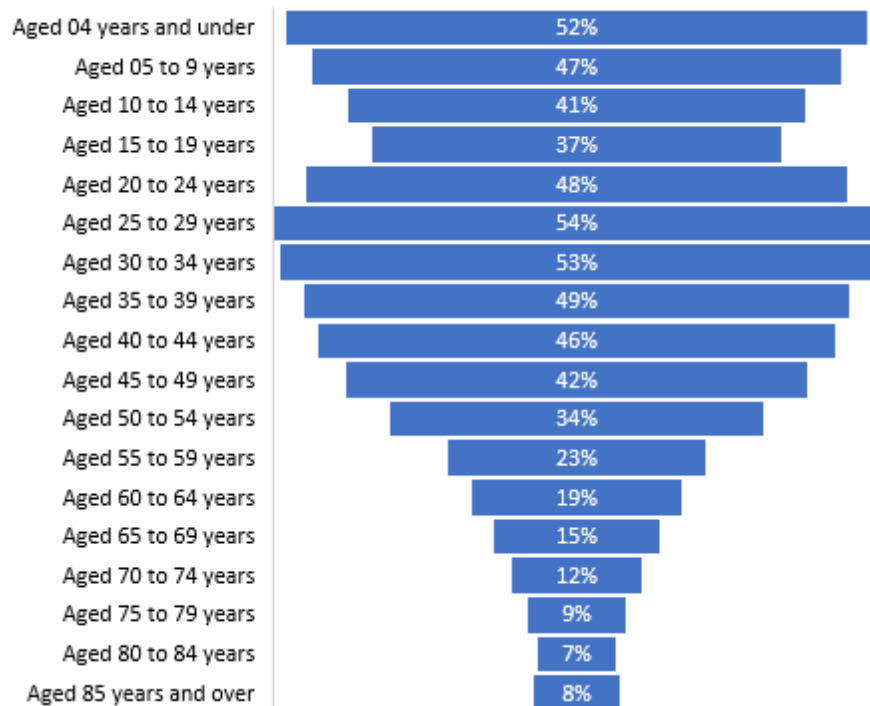
2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

Details of impacts identified

Census 2021 data shows that the highest proportions of Brent residents who inhabit the PRS are those between the ages of 25 and 34, followed by residents aged 14 or younger.

- Children aged 14 and under account for more than 20% of the total number of Brent residents living in the PRS.
- Nearly 52% of children who are aged 4 and under in Brent inhabit the PRS.
- Another large proportion of Brent residents who privately rent (nearly 43%) are aged between 25 and 44 years old (the parents of those young children presumably being partially among that demographic).
- Over 50% of Brent residents who are aged between 25 and 44 live in the PRS.
- Owner-occupation gradually rises as residents surpass the age of 29, with those residents aged 75 and over being least likely to inhabit Brent's PRS (with only 8% of that demographic privately renting).

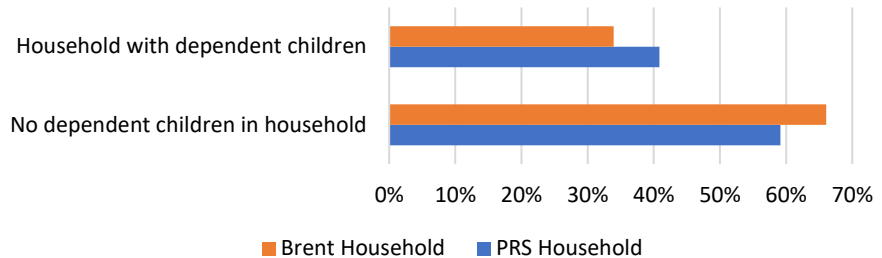
% of each age group living in the PRS in Brent



The Council also considered it relevant (within the equality analysis for 'age') to compare living arrangements and prevalence of dependent children in Brent's PRS with the borough as a whole:

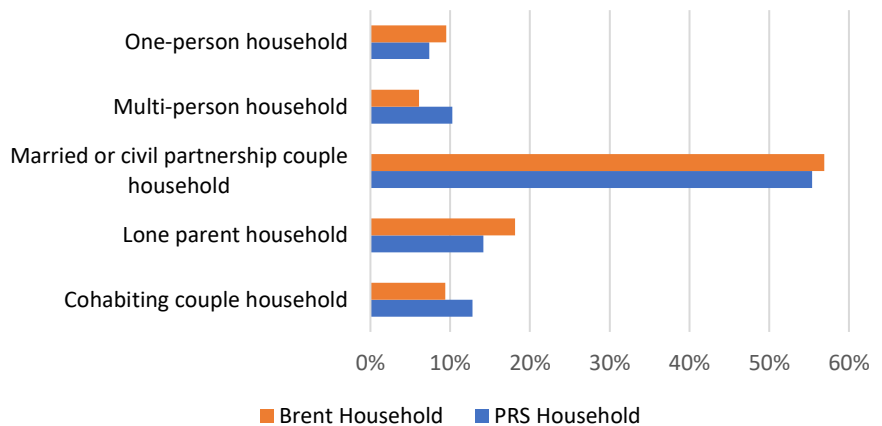
- Households with dependent children are underrepresented in Brent's PRS at 59% (compared with 66% of all households in the borough)

% Brent PRS households relative to % all Brent households



- PRS households in Brent broadly reflect the wider population of the borough in terms of living arrangements, though multi-person households and cohabitating couple households are slightly overrepresented in Brent's PRS, while one-person households, married or civil partnership couple households and lone-parent households are slightly underrepresented.

% Brent PRS households relative to % all Brent households



This indicates that younger people and multi-person households might be affected to a greater extent by the introduction of the proposed additional licensing scheme, which is intended to improve conditions in the private rented sector. Despite this prevalence, we are finding the numbers of older people and families renting from a private landlord are growing as a result of the growing unaffordability of owner-occupation and inaccessibility of social housing.

As the cost-of-living crisis continues, it is likely that many households with children will be unable to afford to put the heating on, making homes more susceptible to damp, mould and cold. Children aged 14 years or under are at the greatest risk of ill health caused by damp and mould in their homes.

Child poverty AHC was 39.5% in Brent for 2020-21, the seventh highest level across London (*End Child Poverty*). The average for London in the equivalent period was 35.2%. In the seven years since 2014/15 that these figures have been published there has been very little change in Brent's performance over time, with figures between a high of 40.9% for 2018-19 and a low of 39.5% in 2021-22².

Increasingly, families with young children are living in HMOs, with whole families sometimes renting a single room in an unlicensed property in substandard conditions. Students and young professionals, who can be exploited in the current rental market, also tend to live the private rented sector and in HMOs in particular.

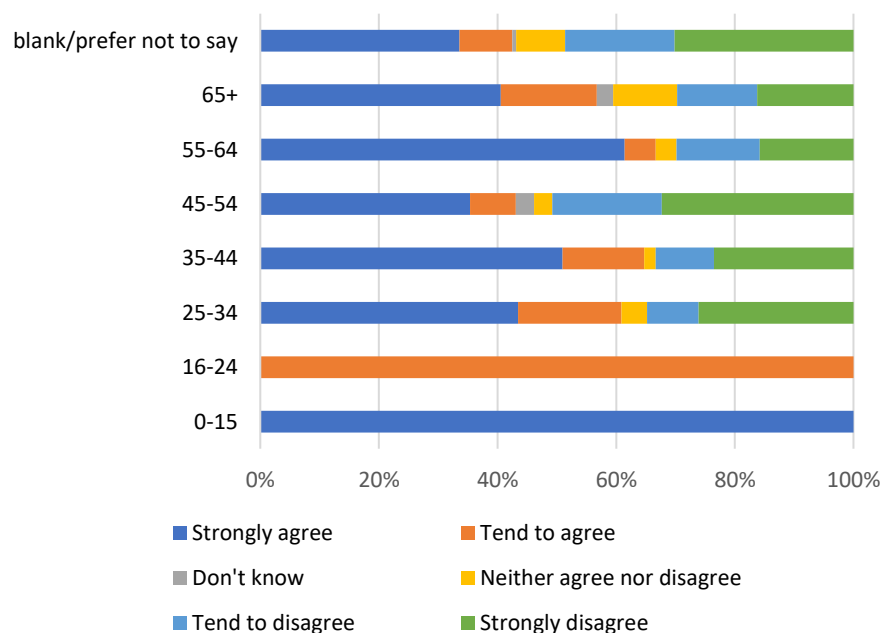
Effective regulation of HMOs, leading to an improvement in housing standards has the potential to benefit all HMO tenants as well as the wider community. We know that some health hazards are considered to be particularly serious for young people so this group would particularly benefit from the better regulation of the sector.

Respondents to the questionnaire

Compared to the Census data 2021 for adult population of the borough, younger residents (up to the age of 34) were underrepresented, whereas those over the age of 35 were more accurately represented in the consultation data.

Respondents across most age groups were largely in favour of the proposals, though there was more disagreement among some older age groups (who are less likely to be privately renting than younger residents).

Do you agree with the proposals? by age group

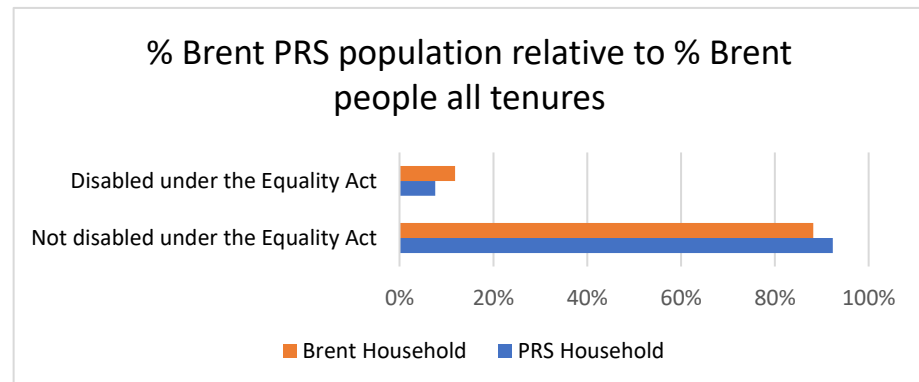


² Borough Plan 2023-27 Evidence Pack

DISABILITY

Details of impacts identified

According to Census 2021 data, residents who are disabled under the Equality Act are slightly underrepresented in Brent's PRS (8% compared to 12% of the borough's population).



People with disabilities may find themselves in the position of renting within an HMO. Unsuitable housing has a severe impact on people with disabilities, leading to anxiety, isolation, and which can hinder independent living. The Equalities and Human Rights Commission's 2018 report identified that disabled individuals face disadvantages in the private rented sector due to landlords' reluctance to adapt properties, hesitation to rent to them, and short-term tenancies discouraging adaptations. Hazards in unsafe properties can exacerbate existing conditions. Renewing the additional HMO licensing scheme will help improve conditions and safety for disabled tenants as the scheme will generate increased inspections. This will ensure people are referred to the appropriate internal departments or external agencies to have their living accommodation suitably assessed and adapted for their needs. Unsuitable or un-adapted housing can have a negative impact on disabled people, leading to mobility problems inside and outside the home, poorer mental health and a lack of employment opportunities. An ageing population will see the numbers of disabled people continuing to increase and it is important that the Council continues to use measures such as property licensing to ensure its residents with disabilities are living in safe, well-adapted homes.

If properties are assessed for the health and safety of their inhabitants, it is probable that people with mobility and visual/hearing difficulties, for example, may disproportionately benefit from licensing through professionals' suggestions of supportive modifications to the properties. This would serve to reduce the inequality gap between those with and without serious long term health conditions.

The renewal of the borough-wide additional HMO licensing schemes is considered to have an overall positive impact on this group. Proportionally the scheme is more likely to impact on people without long-term disabilities or illnesses as these people are less likely to be

in rented accommodation in the borough. However, for persons with disabilities/long-term illnesses who are in private rented accommodation, the schemes will also benefit them.

Respondents to the consultation

8% of the respondents to the questionnaire said they have a long-term physical or mental health condition or illness, which is less than the Census 2021 figure of 12% for the borough.

Of this 8% who said they have a long-term physical or mental health condition, the majority were in favour of the proposals.

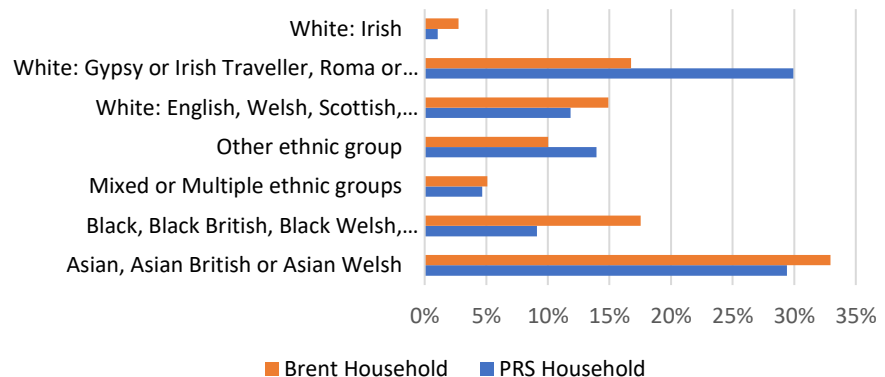
RACE

Details of impacts identified

Data from the 2021 census indicates that people who rent from a private landlord are broadly representative of the ethnicities within Brent's wider population, although some groups are over or underrepresented:

- The largest ethnic group in Brent, 'Asian, Asian British or Asian Welsh' (33% of Brent residents) is slightly underrepresented in the PRS, making up 29%.
- 'White: Gypsy or Irish Traveller, Roma or Other White' are overrepresented in the PRS at 30% of residents in that tenure (though only making up 17% of Brent's population).
- 'Black, Black British, Black Welsh, Caribbean or African' are underrepresented in the PRS at 9% of residents in that tenure while making up 18% of Brent's population.
- Other ethnicities are broadly representative of the resident population as a whole, with 'White: English, Welsh, Scottish, Northern Irish or British' slightly underrepresented and those who identified as 'Other ethnic group' slightly overrepresented.

% Brent PRS population relative to % Brent population all tenures

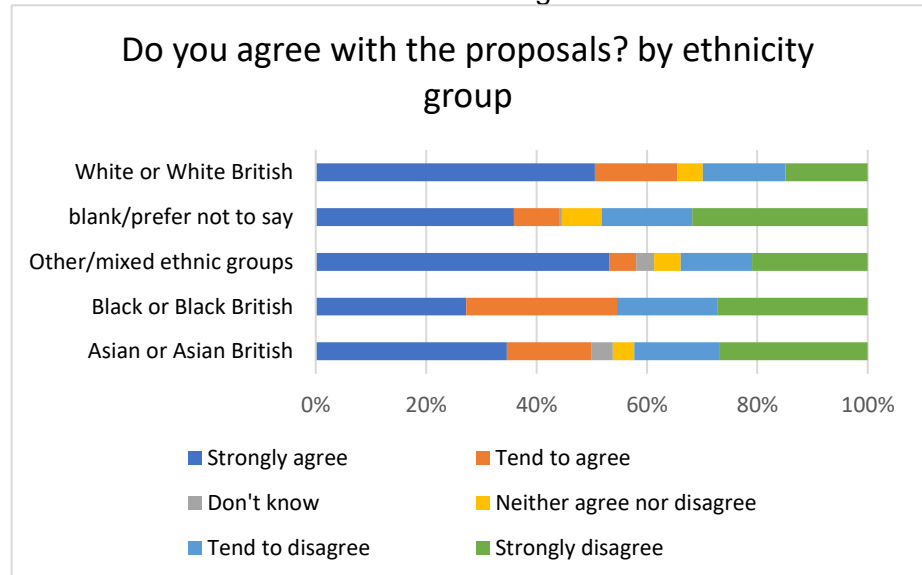


Respondents to the consultation

Of the respondents who chose to answer this question, the largest ethnic group was White or White British, who made up 47% of respondents. This is higher than the borough's Census figure of 34.6%. This was followed by Other/mixed ethnic groups, making up 33% of respondents which is above the Census figure of 15%. Asian or Asian British respondents made up 14%, compared to the Census figure of 32.8% and Black or Black British respondents were 6%, compared to the Census figure of 17.5%, therefore both Asian or Asian British and Black or Black British respondents were underrepresented.

It should however be noted that, along with many of the other equalities questions, a majority of respondents (51%) chose not to share their ethnicity, so definitive conclusions about representation cannot be made.

Most ethnic groups were broadly in favour of the proposals to introduce a new additional HMO licensing scheme.



The renewal of the additional HMO licensing scheme aims to safeguard vulnerable households from unscrupulous landlords. It aims to ensure tenants receive legal protections while taking robust enforcement actions against landlords who exploit their tenants and do not comply with their legal responsibilities.

The assessment of landlords to be 'fit and proper people' will identify any with convictions for hate crimes of any kind, excluding these people from a position where harassment, victimisation or discrimination of any kind has the potential to be particularly harmful. The assessment of landlords should on balance reduce the number of landlords in the borough who might discriminate against people on the grounds of their race.

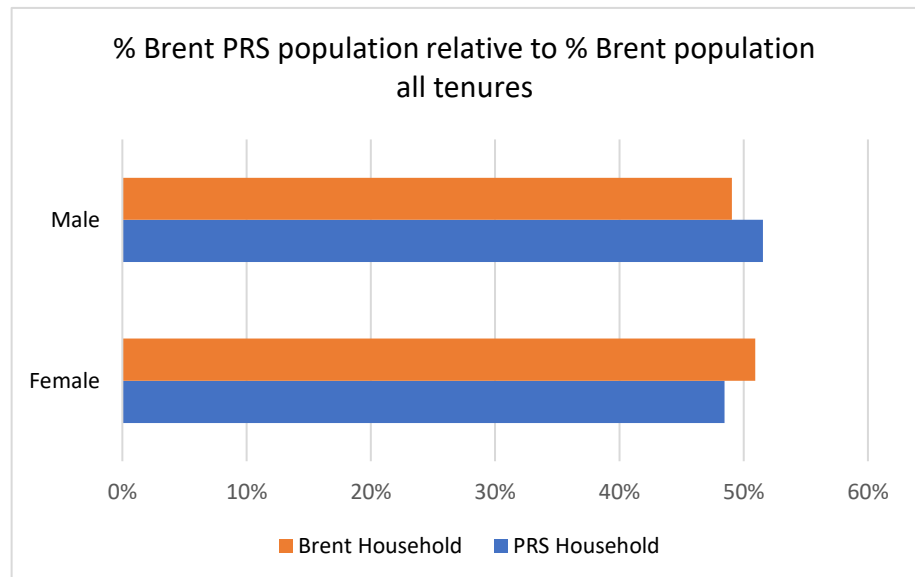
The proposal is to renew the additional HMO licensing scheme which, if agreed and implemented, would serve to improve the

standard of HMOs and the PRS. It is considered that this would have an overall positive impact across all ethnic groups.

SEX

Details of impacts identified

Census 2021 data shows that the numbers of males and females inhabiting the PRS in Brent corresponds with the total Brent population.



The assessment of landlords to be 'fit and proper people' will identify any with convictions for hate crimes of any kind, excluding these people from a position where harassment, victimisation or discrimination of any kind has the potential to be particularly harmful. The assessment of landlords should on balance reduce the number of landlords in the borough who might discriminate against people on the grounds of their sex.

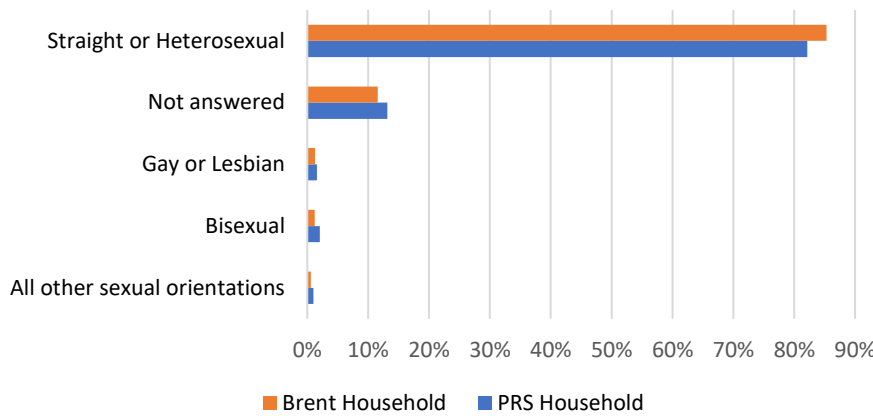
The proposal is to renew the additional HMO licensing scheme which, if agreed and implemented, would serve to improve the standard of HMOs and the PRS. It is considered that this would have an overall positive impact on both female and male PRS tenants.

SEXUAL ORIENTATION

Details of impacts identified

According to Census 2021 data (*residents aged 16 and over*), the sexual orientation of residents within the PRS in Brent is broadly similar to that of the wider Brent population.

% Brent PRS population relative to % Brent population all tenures



Sexual Orientation	Brent Household (%)	PRS Household (%)
Straight or Heterosexual	~85%	~82%
Not answered	~12%	~15%
Gay or Lesbian	~2%	~2%
Bisexual	~2%	~2%
All other sexual orientations	~1%	~1%

Additional HMO licensing aims to reduce antisocial behaviour which is likely to benefit people who suffer homophobic crime and incidents. The assessment of landlords to be 'fit and proper people' will identify any with convictions for hate crimes of any kind, excluding these people from a position where harassment, victimisation or discrimination of any kind has the potential to be particularly harmful. The assessment of landlords should on balance reduce the number of landlords in the borough who might discriminate against people on the grounds of their sexual orientation.

The proposal is to renew the additional HMO licensing scheme which, if agreed and implemented, would serve to improve the standard of the HMOs and the PRS. It is considered that this would have an overall positive impact on tenants irrespective of sexual orientation.

PREGNANCY AND MATERNITY

Details of impacts identified	<p>The Council does not hold specific data regarding pregnancy and maternity within the PRS. However, the ONS linked births dataset shows that in 2024 there were a total of 4,443 live births in Brent³. In 2022, the live birth rate was 13 per 1,000 population in the borough which is predicted to remain stable over the next ten years⁴. We already know that nearly 52% of children who are aged 4 and under, and over 47% of children between the ages of 5 and 9 in Brent live in the PRS. This suggests that a significant proportion of families with children reside in the private rented sector, and highlights that the licensing scheme's advantages would positively impact both parents and expectant parents.</p> <p>The assessment of landlords to be 'fit and proper people' will identify any with convictions for hate crimes of any kind, excluding these people from a position where harassment, victimisation or</p>
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³ [Births in England and Wales: linked births - Office for National Statistics](#)

⁴ [Birth characteristics - Office for National Statistics](#)

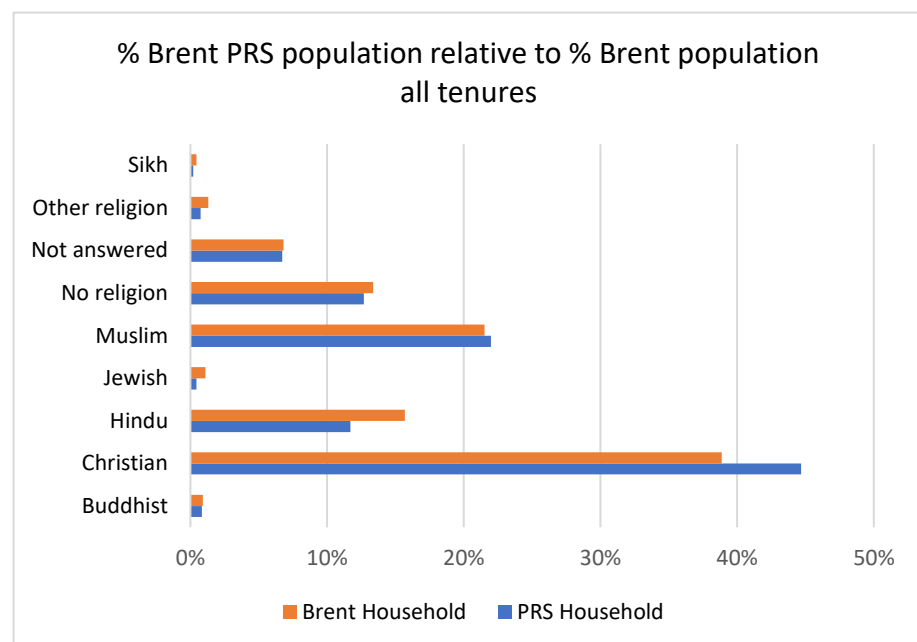
discrimination of any kind has the potential to be particularly harmful. The assessment of landlords should on balance reduce the number of landlords in the borough who might discriminate against people on the grounds of pregnancy or maternity.

The proposal is to renew the additional HMO licensing scheme which, if agreed and implemented, would serve to improve the standard of HMOs and the PRS. It is considered that this would have an overall positive impact on pregnant women and women caring for babies and young children.

RELIGION OR BELIEF

Details of impacts identified

According to census 2021 data, the religious beliefs of persons occupying the PRS in Brent are broadly reflective of the wider population living in the borough. However, Christians are somewhat overrepresented in the PRS (45%) compared to the borough as a whole (39% of Brent's population) and Hindus are slightly underrepresented (12% of the PRS compared to 16% of Brent's population).



While there is limited evidence to suggest that renters might face poor conditions or exploitation in the private rented sector solely due to their religion, instances of direct or indirect religious discrimination cannot be entirely ruled out. It is more probable that when religion intersects with race and immigration status, renters may experience disadvantages or discrimination, potentially restricting them to the most insecure or substandard housing options.

The assessment of landlords to be 'fit and proper people' will identify any with convictions for hate crimes of any kind, excluding these people from a position where harassment, victimisation or discrimination of any kind has the potential to be particularly harmful. The assessment of landlords should on balance reduce the number

of landlords in the borough who might discriminate against people on the grounds of their religion or beliefs.

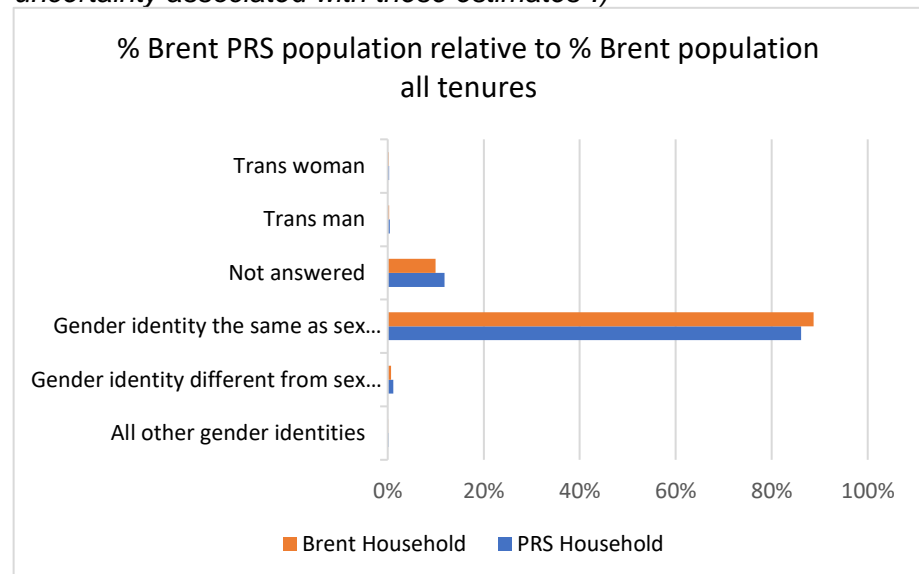
The proposal is to renew the additional HMO licensing scheme which, if agreed and implemented, would serve to improve the standard of HMOs and the PRS. It is considered that this would have an overall positive impact across all faith groups, and those of no faith at all.

GENDER REASSIGNMENT

Details of impacts identified

According to Census 2021 data (*residents aged 16 and over*), the gender identities reflected in the Brent residents who rent from a private landlord are broadly the same as in the wider Brent population.

(Gender Identity estimates from Census 2021 are official statistics in development. This reflects their innovative nature and the evolving understanding of measuring gender identity, along with the uncertainty associated with these estimates⁵.)



According to Stonewall's Trans Report (2018)⁶:

- One in four trans people (25%) were discriminated against when looking for a house or flat to rent or buy in the last year (up to 2018).
- One in five non-binary people (20%) have experienced discrimination while looking for a new home.
- Two in five trans people (41%) have experienced a hate crime or incident because of their gender identity in the last 12 months (most recent data from 2018).
- Three in ten non-binary people (31%) have experienced a hate crime or incident because of their gender identity.

⁵ Sexual orientation and gender identity quality information for Census 2021 - Office for National Statistics (ons.gov.uk)

⁶ LGBT in Britain - Trans Report (2018) | Stonewall

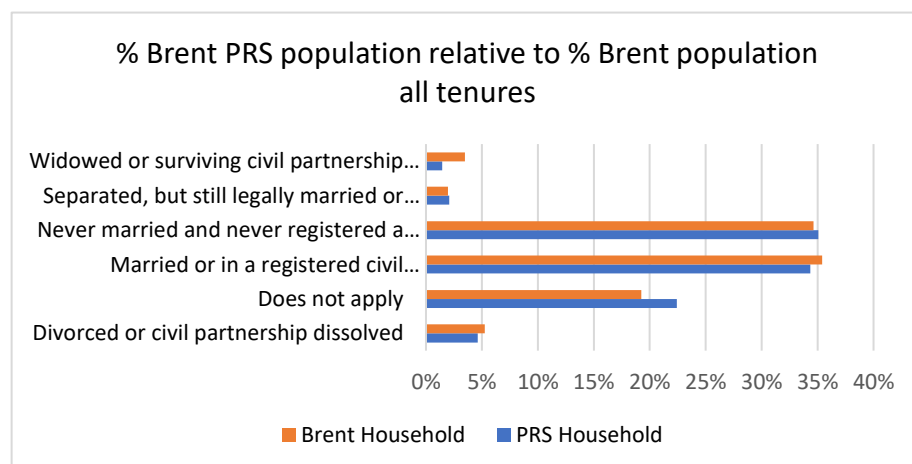
Additional HMO licensing aims to reduce antisocial behaviour within and associated to private rented homes, which is likely to benefit people who suffer transphobic crime and incidents. The assessment of landlords to be 'fit and proper people' will identify any with convictions for hate crimes of any kind, excluding these people from a position where harassment, victimisation or discrimination of any kind has the potential to be particularly harmful. The assessment of landlords should therefore on balance reduce the number of landlords in the borough who might discriminate against people because of gender reassignment.

The proposal is to renew the additional HMO licensing scheme which, if agreed and implemented, would serve to improve the standard of the HMOs and the PRS. It is considered that this would have an overall positive impact on tenants irrespective of gender reassignment.

MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified

Census data 2021 indicates that persons occupying the PRS in Brent broadly reflect the wider population of the borough in terms of their marital status, though those who are widowed or a surviving civil partner are somewhat underrepresented in the PRS (1% compared to 3% of Brent's overall population).



The assessment of landlords to be 'fit and proper people' will identify any with convictions for hate crimes of any kind, excluding these people from a position where harassment, victimisation or discrimination of any kind has the potential to be particularly harmful. The assessment of landlords should on balance reduce the number of landlords in the borough who might discriminate against people on the grounds of whether they have entered into marriage or a civil partnership with someone of the same or a different sex.

The proposal is to renew the additional HMO licensing scheme which, if agreed and implemented, would serve to improve the standard of HMOs and the PRS. It is considered that this would have an overall positive impact on tenants irrespective of whether or not they are married or in a civil partnership.

3. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

No

4. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

Mixed (representation of overall population explained above, broken down by demographic)

5. Please detail any areas identified as requiring further data or detailed analysis.

None

6. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

N/A

7. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

We will monitor the impact on equalities during the implementation of the licensing scheme (if approved) and conduct a review 12 months after implementation.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

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, improve property conditions and management standards in HMOs. 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.

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.

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, in addition to training and education to help them to manage their properties.

A publicity campaign will be 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 additional licensing is continued, it is intended to enforce the scheme robustly and to closely monitor the situation on an on-going basis and carry out periodic reviews.

SECTION D – RESULT

Please select one of the following options. Mark with an "X".

A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	X
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	
C	CHANGE / ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

SECTION E - ACTION PLAN



This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date

Licensing will work with landlords and liaise with Temporary Accommodation teams.	Homeless prevented	Licensing Manager	April 2026
Assist tenants with legal advice and signpost them to relevant support services available to them.	Tenants' rights observed	Licensing Manager	April 2026
Provide communication with and support provided to tenants with Learning Disabilities, Mental Health needs.	Tenants' rights observed	Licensing Manager	April 2026
Licensing is likely to see an increase in enforcement action against BAME landlords who may be overrepresented in Brent. Enforcement will be in line with our private housing enforcement policy, where possible using civil penalties as an alternative prosecution.	Early compliance and applying formal enforcement only where required. Civil penalties used as opposed to prosecutions.	Licensing Manager	April 2026
Equalities impact to be part of the licensing review	Ensure positive outcome or justify any unavoidable negative outcome	Licensing Manager	April 2026

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	James Philip 
REVIEWING OFFICER: Head of Service	Triza Handa 
Operational Director:	Spencer Randolph

