

As a public authority we need to ensure that all our strategies, policies, service and functions, both current and proposed have given proper consideration to equality, diversity, cohesion and integration. In all appropriate instances we will need to carry out an equality, diversity, cohesion and integration impact assessment.

This form:

- can be used to prompt discussion when carrying out your impact assessment
- should be completed either during the assessment process or following completion of the assessment
- should include a brief explanation where a section is not applicable

Directorate: Resources and Housing	Service area: Housing Leeds
Lead person: Mark Ireland	Contact number: 0113 5351369
Date of the equality, diversity, cohesion and integration impact assessment: 31st May 2019	

1. Title: Designation of Harehills as a selective licensing area
Is this a:
<input type="checkbox"/> Strategy /Policy <input checked="" type="checkbox"/> Service / Function <input type="checkbox"/> Other
If other, please specify

2. Members of the assessment team:

Name	Organisation	Role on assessment team e.g. service user, manager of service, specialist
Mark Ireland	LCC	Service Manager
Helen Tallant	LCC	Principal Housing Officer – Project Lead
Tom O’Connell	LCC	Senior Housing Officer – SL team
Nao Rooney	LCC	Housing Officer - SL team
Michael Brook	LCC	Service Manager
Robert McCartney	LCC	Head of Service LHO

3. Summary of strategy, policy, service or function that was assessed:

The introduction of discretionary licensing, known as selective licensing, under the provisions of Part 3 of the Housing Act 2004 (the Act).

Based on a business case developed in line with Government policy, the Council is looking to designate parts of Harehills as a selective licensing area, see the map and street list in the business case for details of the area under consideration.

The case for the designation is based on the level of deprivation criteria as per the Government guidance for selective licensing, Selective Licensing in the private rented sector: A Guide for local authorities, March 2015.

The designation is linked to the Council's vision and priorities to address poor housing; poverty; ensuring community safety and having a decent place to live. The Locality Agenda has highlighted the fact that certain areas of the city are now suffering from increased deprivation and poverty based on the latest Index of Multiple Deprivation data (IMD). Harehills is an area that falls into this category and has been recognised by the Council and partners as an area requiring further intervention.

All private sector landlords will require a licence to operate their business for the period of the designation, which is up to 5 years. All licences have conditions which the landlord needs to abide by. Failure to obtain a licence or abide by any licence condition is an offence which may lead to legal action being taken against the owner, namely prosecution or civil penalty up to £30k.

The licence attracts a licence fee which covers the cost of the scheme and only the scheme. The income generated by the licence fee cannot be used to cover the costs of any other services including dealing with property conditions. All other costs have to be borne by the Council and partners from their existing budgets. The fee income will pay for officers dedicated to implementing the scheme; visiting properties; chasing non-compliant landlords and enforcing any breaches of conditions or landlords who fail to obtain a licence.

The additional power addresses management in the private rented sector, not property conditions/hazards as the Council already has a duty under Part 1 of the Act to address these. Whilst selective licensing itself will not address hazards it will mean officers will be crossing the threshold of all privately rented properties within the designated area, allowing standards to be addressed by others if they are identified as part of any visit.

The scheme's success relies on a partnership approach being taken in the area. Partners, including the Police, Fire Service, Employment, third sector etc have been consulted on the proposal and will be working with the team to address issues in the area.

In February 2018 the Council's Executive Board approved the consideration of selective licensing in Harehills and for officers to consider if there was a suitable business case for its introduction in the area. This has involved considering the options under the Government criteria for such a scheme; in this case deprivation and levels of the private rented sector. Government guidance identifies the need to undertake a minimum 10 week consultation for all stakeholders to allow them to have their say on the proposal. This occurred from the 1st August 2018 to 31st October 2018. The overall response was 1126 of

which 222 were landlords/managing agents and 904 were from residents/stakeholders.

If the overall number of privately rented properties subject to discretionary licensing schemes is less than 20% of the total in the city and the geographical area covered by any scheme(s) is less than 20%, the Council can self-designate an area without Secretary of State approval. In this case the scheme would fall into the self-designation category, so the Council's Executive Board will be required to determine the scheme.

4. Scope of the equality, diversity, cohesion and integration impact assessment
 (complete - 4a. if you are assessing a strategy, policy or plan and 4b. if you are assessing a service, function or event)

4a. Strategy, policy or plan

(please tick the appropriate box below)

The vision and themes, objectives or outcomes	<input type="checkbox"/>
The vision and themes, objectives or outcomes and the supporting guidance	<input type="checkbox"/>
A specific section within the strategy, policy or plan	<input type="checkbox"/>
Please provide detail:	

4b. Service, function, event

please tick the appropriate box below

The whole service (including service provision and employment)	<input type="checkbox"/>
A specific part of the service (including service provision or employment or a specific section of the service)	<input checked="" type="checkbox"/>
Procuring of a service (by contract or grant)	<input type="checkbox"/>

Please provide detail:

Selective licensing is a power available to Council's under Part 3 of the Housing Act 2004 to designate an area - based on certain criteria –for discretionary licensing. This means all private rented sector landlords operating in the area will require a licence to let their properties. The aim of any scheme is to improve the management of the area.

Any scheme will be self-financing as the licence fee covers the cost of the scheme (and only the scheme). The licence fee is payable by landlords for the 5 years of the scheme and it is a 2 part payment – one part for processing the licence and one part for the inspection and enforcement of the scheme. If a landlord is a member of the Leeds Rental Standard they will receive a discount on the licence fee as they should be fully compliant and therefore will be quicker to process and inspect.

Any scheme will be developed and managed by the Council's Private Sector Housing Team, with additional officers being recruited and funded via the licence fee income.

Successful schemes run alongside and in partnership with other initiatives. Complementary initiatives will form part of any approved scheme and will be developed to meet the needs of the area over the 5 year period of any designation.

The aim is to visit all privately rented properties within the designated area. This is based on the assumption that the majority of properties are compliant, which from the consultation feedback from the sector they say they are, and the co-operation of the sector if approved. If either of the above is not the case then this may need to be reviewed.

5. Fact finding – what do we already know

Make a note here of all information you will be using to carry out this assessment. This could include: previous consultation, involvement, research, results from perception surveys, equality monitoring and customer/ staff feedback.

(priority should be given to equality, diversity, cohesion and integration related information)

The Council has set out the vision for the city with the ambition to be the Best Council. It provides a strategic vision for the city and what it hopes to achieve for everyone in the city. 'Best city in the UK' is the key aim of the Vision for Leeds 2011 to 2030. This means:

- Leeds will be fair, open and welcoming
- Leeds' economy will be prosperous and sustainable
- All Leeds' communities will be successful.

To achieve this challenge, the Council has set a number of aims for itself and partners, these include:

- Sufficient housing including affordable housing that meets the needs of the community
- People have the opportunity to get out of poverty
- Communities are safe and people feel safe
- All homes are of a decent standard and everyone can afford to stay warm
- Houses to rent and buy will meet the needs of people at different stages of their

lives

Unfortunately, Harehills has seen an increase in deprivation over the last few years. The last Index of Multiple Deprivation (IMD) data shows that whilst previously there were no areas in the lowest 1% there are now areas in Harehills that are in the lowest 1% most deprived communities in the country. If you live in the proposed area for the scheme then:

- *Parts of the Harehills Selective Licensing area fall within the lowest 1% of deprived areas in England.*
- *Harehills has seen an increase in the number of people living there, making it one of the most densely populated areas in the city.*
- *The last 10 years has seen a significant increase in people living in the private rented sector in Harehills, such that it is now the main provider of homes in the area yet has some of the poorest homes in the city*
- *Harehills has some of the highest levels of antisocial behaviour and crime in the city.*
- *People in Harehills have a quarter less income to spend than the average person living in Leeds.*
- *Every year, for the last five years, Harehills has had more clean-up requests than any other ward in the city.*
- *In Harehills you are likely to die on average 2.5 years earlier than the city average.*

Factors affecting deprivation are complex. Selective licensing on its own will not solve all the issues but in conjunction with other initiatives, it has a role to play. The main aim of selective licensing is to address the management and safety of privately let properties. By introducing a scheme, officers will be crossing the threshold of a significant number of properties in the area allowing not just management and safety of people's homes to be improved but also allowing housing conditions to be assessed together with the needs of the occupiers around areas such as employment and training, financial assistance via benefit checks and support, help with access to services and support with dealing with poor landlords.

The consultation has shown that landlords/managing agents in the area are against the introduction of any scheme. Their main concerns are

- Cost of the licence
- See no benefit from the introduction of the scheme
- The area does not require such an intervention
- It will lead to increased homelessness and empty homes

The consultation for selective licensing has shown that residents and stakeholders are for the introduction of the scheme as they see it benefiting the area, addressing issues of crime, ASB and poor landlords who they perceive are causing issues in the area. However they do have concerns:

- Increased cost of their rent
- Potential loss of homes
- Concerns in some communities that they may be prejudiced due to the conditions – need for reference and ASB used against them.

Are there any gaps in equality and diversity information

Please provide detail:

The consultation shows that there is a diverse community which is hard to reach. There is a need to work with partners and community leaders to better engage with these communities

This will not happen overnight but will have to be an ongoing process as communities gain confidence in the process.

Action required:

If introduced, to work closely with partners to ensure a full understanding of issues for the communities involved.

To continue to work via the existing community networks to support those communities affected by any approved scheme

To work with and support landlords to ensure an understanding of expectations from the sector and to put in place support for them to address issues they face in the area

To produce guidance documentation for the scheme so it is clear what is expected from the sector in relation to selective licensing

To develop partnerships with others to maximise the opportunities that any approved scheme could afford the area

To ensure that robust enforcement is in place to address non-compliant and criminal landlords who adversely affect the area

6. Wider involvement – have you involved groups of people who are most likely to be affected or interested

Yes

No

Please provide detail:

Harehills Neighbourhood Partnership – partnership mechanism for addressing issues in the area.

Landlord Associations – National Landlord Association, Unipol, Residential Landlord Association, Leeds Rental Standard Board members, No Campaign

Third sector housing providers – Canopy, LATCH, GIPSIL

Social housing providers in the area

Local community groups

Third sector partners – those commissioned to provide services in the area. Community representatives

Ward members
Other LA services - Legal, Cleaner Neighbourhoods, Employment, Sundry Accounts,
Housing Leeds

Action required: To work with all groups on the introduction and delivery of any approved scheme

7. Who may be affected by this activity?

Please tick all relevant and significant equality characteristics, stakeholders and barriers that apply to your strategy, policy, service or function

Equality characteristics

Age

Carers

Disability

Gender reassignment

Race

Religion
or Belief

Sex (male or female)

Sexual orientation

Other

(**Other** can include – marriage and civil partnership, pregnancy and maternity, and those areas that impact on or relate to equality: tackling poverty and improving health and well-being)

Please specify:

Owner/occupiers, public sector housing providers, private sector landlords and tenants, employed/unemployed, income

Stakeholders

Services users

Employees

Trade Unions

Partners

Members

Suppliers

Other please specify

Landlords of all tenures

Potential barriers.

- | | | | |
|-------------------------------------|--|-------------------------------------|--|
| <input checked="" type="checkbox"/> | Built environment | <input type="checkbox"/> | Location of premises and services |
| <input type="checkbox"/> | Information and communication | <input type="checkbox"/> | Customer care |
| <input checked="" type="checkbox"/> | Timing | <input type="checkbox"/> | Stereotypes and assumptions |
| <input checked="" type="checkbox"/> | Cost | <input checked="" type="checkbox"/> | Consultation and involvement |
| <input checked="" type="checkbox"/> | Financial exclusion | <input checked="" type="checkbox"/> | Employment and training |
| <input checked="" type="checkbox"/> | specific barriers to the strategy, policy, services or function | | |

Please specify

Landlords may not have the funds to run their business – may leave the sector reducing supply

Any licence fee costs may be passed on to the tenant

Brexit – impact on the area due to the diverse community from the EU

Partners - need to look at how they work and what difference can they make.

8. Positive and negative impact

Think about what you are assessing (scope), the fact finding information, the potential positive and negative impact on equality characteristics, stakeholders and the effect of the barriers

8a. Positive impact:

Improved homes for people to live in – licence conditions aimed at ensuring safe, clean and well managed properties.

By visiting properties, housing standards will be improved as poor homes will be identified for action. Also the sector knows that visits will be made so they are more likely to ensure compliance with the legislation to avoid formal action.

Work with the sector – especially good landlords – to help to improve their businesses and support them to address problems with their properties and tenants.

Target poor/criminal landlords who may blight the area

Working with partners to address wider issues of deprivation – better targeting of resources to those most in need. Help to create a network of organisations working in the area to provide better service provision to those in need

Tenants supported as properties visited so removing the fear of reporting poor conditions.

Work with tenants to ensure they know their rights and the standards they should expect

from their landlord

Action required:

To continue to develop partnerships to allow the better use of resources and a different way of working to make a difference to people's lives
To develop guidance for landlords to ensure they have knowledge of what any scheme would require from the sector
To continue to develop tenant support networks to help vulnerable communities and individuals with their homes and support against criminal landlords
To further develop the enforcement partnerships to target criminal landlords

8b. Negative impact:

There is a risk that landlords will pass the licence fee onto the tenants. Whilst there is a limit to any rent increase based on the overall market rent this may put tenants in financial hardship or cause them to move to other parts of the city with low rent levels
If introduced, landlords may choose to evict tenants and leave their homes empty. This could increase homelessness and empty homes in the area
The scale of the rental market in the area means that improvements will take time – it will not occur overnight and will take time for the benefits of any scheme to be realised.
Vulnerable individuals/families/communities in the area may feel at risk of losing their homes either legally or illegally or they maybe impacted financially as rents increase - this may lead to them moving which will affect themselves in relation to the services and schools they currently access
Landlords may divest from the area and move to another part of the city – dispersing the issues to another area and community in the city

Action required:

To work with financial colleagues i.e. Credit Union to support tenants who may face financial difficulties
LHO – to work with to address homelessness/prosecute for illegal evictions
Empty Homes team - to target all empty homes in the area including the use of buy back and CPO
To have quick wins – to target non-compliant landlords at the start of the scheme, look at an initiative to make a difference that can be instigated when any designation comes into force to make a quick difference to the area
To monitor any displacement and manage any issues that arise from it.

9. Will this activity promote strong and positive relationships between the groups/communities identified?

Yes **No**

Please provide detail: To continue to develop partnerships to make a difference to people's lives in the area. To work with Council partners i.e. waste to address environmental issues and external partners ie the Police to work as part of a wider partnership to address crime and criminality in the area.

Action required:
To look at how to work differently with partners when crossing the threshold of privately rented homes. To look at how best to target resources and how to attract new funding over the life of any scheme.

10. Does this activity bring groups/communities into increased contact with each other? (e.g. in schools, neighbourhood, workplace)

Yes **No**

Please provide detail:
Working in the partnership model as proposed means new contacts will be made and developed across the area, especially with the community representatives. This helps to develop a network of interest parties all with the aim of improving the area

Action required:
To work closely with all partners – internal, external, third sector to add value to existing networks and partnerships

11. Could this activity be perceived as benefiting one group at the expense of another? (e.g. where your activity/decision is aimed at adults could it have an impact on children and young people)

Yes **No**

Please provide detail:

The perception may be that private tenants and the community at large will benefit from the actions of landlords who will be charged a licence fee to pay for selective licensing. This may be considered detrimental to the sector as whilst they may benefit as a result the main beneficiaries will be the community as a whole

Action required:

None

12. Equality, diversity, cohesion and integration action plan

(insert all your actions from your assessment here, set timescales, measures and identify a lead person for each action)

Action	Timescale	Measure	Lead person
Empowerment/support of tenants with housing conditions and their needs	Ongoing during the life time of the scheme	Number of properties improved Number of referrals to partners Number of actions / interventions	Deputy Service Manager – selective licensing (DSM-SL)
Diverse background of people living in the area <ul style="list-style-type: none"> • To work with partner organisations to work with their client groups to support their needs • To work with the Leeds Rental Standard to support landlords • To look to support vulnerable individuals and communities and meet their needs by ensure their needs are met as part of the delivery of the scheme – work in partnership with other to better target resources to meet need 	Ongoing during the life of the scheme	Number of referrals made to partners Number of referrals from partners for action by the SL team to support housing need	DSM - SL

Action	Timescale	Measure	Lead person
<p>High turnover of tenants living in the area – to develop information pack for the use by officers and partners to support new residents and landlords in the area</p> <p>Link this information to the Migration Access Project (MAP+) and the existing on-line access to information for the migrant communities.</p>	<p>By Jan 2020</p> <p>By Jan 2020.</p>	<p>To develop the pack for residents and partners to support the residents by Jan 2020</p>	<p>DSM - SL</p>
<p>Ensure aware of all stakeholders of the scheme taking account of the diverse make-up of the communities and stakeholders in the area</p>	<p>Initial awareness campaign Oct 19 to Jan 20</p> <p>Ongoing from Jan 20 for the life of the scheme</p> <p>Produce an application form and guidance on the expectations in relation to the licence conditions for Oct 19. (The format to include electronic and paper versions)</p>	<p>Number of applications received</p> <p>Awareness of the scheme when visiting tenants as part of any property checks</p> <p>Partners promotion of the scheme to their client groups</p>	<p>DSM- SL/Communication Team</p>

Action	Timescale	Measure	Lead person
Ensure there is a comprehensive communication plan in place.	Thorough communications put in place prior to implementation and then ongoing throughout the life of the scheme.	Feedback from stakeholders and the community.	DSM – SL and communications team.
To implement the actions within the delivery plan in the business case	From approval of the scheme and during the lifetime of the scheme	Monitoring of the delivery plan in the business case	DSM - SL

13. Governance, ownership and approval

State here who has approved the actions and outcomes from the equality, diversity, cohesion and integration impact assessment

Name	Job Title	Date
Jill Wildman	Chief Officer Housing Management	14 th June 2019
Date impact assessment completed		14th June 2019

14. Monitoring progress for equality, diversity, cohesion and integration actions (please tick)

- As part of Service Planning performance monitoring
- As part of Project monitoring
- Update report will be agreed and provided to the appropriate board
Please specify which board
- Other (please specify)

15. Publishing

Though **all** key decisions are required to give due regard to equality the council **only** publishes those related to **Executive Board, Full Council, Key Delegated Decisions** or a **Significant Operational Decision**.

A copy of this equality impact assessment should be attached as an appendix to the decision making report:

- Governance Services will publish those relating to Executive Board and Full Council.
- The appropriate directorate will publish those relating to Delegated Decisions and Significant Operational Decisions.
- A copy of all other equality impact assessments that are not to be published should be sent to equalityteam@leeds.gov.uk for record.

Complete the appropriate section below with the date the report and attached assessment was sent:

For Executive Board or Full Council – sent to Governance Services	Date sent:
For Delegated Decisions or Significant Operational Decisions – sent to appropriate Directorate	Date sent:
All other decisions – sent to equalityteam@leeds.gov.uk	Date sent: