

# Equality, Diversity, Cohesion and Integration Impact Assessment



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

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

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

## 2. Members of the assessment team:

<b>Name</b>	<b>Organisation</b>	<b>Role on assessment team e.g. service user, manager of service, specialist</b>
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 Beeston 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 criteria of high levels of deprivation as per the Government's guidance for selective licensing, Selective licensing in the private rented sector: A Guide for local authorities, DCLG March 2015.

The designation is linked to the Council's vision and its priorities to address poor housing; tackle poverty and reduce inequality; 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). Beeston 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 comply with any licence condition is an offence which may lead to legal action being taken against the owner, namely prosecution or a civil penalty of up to £30k.

The licence attracts a 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 housing 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 taking action against landlords who fail to obtain a licence for their property.

Selective licensing solely addresses management in the private rented sector. Housing conditions are addressed by Part 1 of the Act. Indeed, Part 1 imposes a duty on the council to keep housing conditions under review with a view to identifying any action that may need to be taken.

Whilst selective licensing itself will not address housing hazards, it will allow officers to gain access to all privately rented properties within the designated area, allowing standards to be addressed by others if they are identified as an issue as part of any visit.

The scheme's success relies on a partnership approach being taken in the area. Partners, including the police; the fire service; employment services; the third sector etc have been consulted on the proposal and will be working with the team to address issues identified in the area.

In February 2018 the Council's Executive Board approved the consideration of selective

licensing in Beeston and for officers to consider if there was a suitable business case for its introduction in the area. This involved considering the options under the Government's criteria for such a scheme; in this case deprivation and the levels of the private rented sector have been considered.

The Government's guidance identifies the need to undertake a minimum 10 week consultation to allow all stakeholders to have their say on the proposal. This occurred from the 1<sup>st</sup> August 2018 to 31<sup>st</sup> October 2018. The overall response was 1688 of which 199 were landlords/managing agents and 1489 were from the community.

If the overall number of privately rented properties subject to discretionary licensing schemes is less than 20% of the total in the city and/or the geographical area covered by any scheme(s) is less than 20%, the Council can self-designate an area without approval from the Secretary of State. 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"/>
<b>Please provide detail:</b>	

**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"/>
	<input type="checkbox"/>

Procuring of a service (by contract or grant)	
<p><b>Please provide detail:</b></p> <p>Selective licensing is a power available to local authorities under Part 3 of the Housing Act 2004 to designate an area - based on certain criteria – for discretionary licensing. It means that all private rented sector landlords operating in the area will require a licence to let each of their properties. The aim of any scheme is to improve the management of the private rented sector in the area.</p> <p>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 period of the scheme (5 years) and it is a 2 part payment, one part for processing the licence application and one part for the inspection and enforcement element 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.</p> <p>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.</p> <p>Successful selective licensing 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.</p> <p>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.</p>	

<p><b>5. Fact finding – what do we already know</b></p> <p>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)</p>
<p>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;</p> <ul style="list-style-type: none"> <li>• Leeds will be fair, open and welcoming</li> <li>• Leeds economy will be prosperous and sustainable</li> <li>• All Leeds communities will be successful.</li> </ul> <p>To achieve this challenge, the Council has set a number of aims for itself and partners, these include;</p>

- Sufficient housing including affordable housing that meets the needs of the community
- People having the opportunity to get out of poverty
- Communities being safe and people feeling safe
- All homes being 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, Beeston 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 Beeston that are in the lowest 1% most deprived communities in the country.

- *Parts of the Beeston selective licensing area fall within the lowest 1% of deprived areas in England.*
- *The last 10 years has seen a significant increase in the number of people living in the private rented sector in Beeston, such that it is now the main provider of homes in the area yet it has some of the poorest homes in the city.*
- *Beeston has some of the highest levels of antisocial behaviour and crime in the city.*
- *2 out of 10 people in Leeds fall into the lowest income band in England whereas in Beeston the figure is more than 8 out of 10*
- *The wards that make up the Beeston selective licensing area had more than double the average call outs for environmental issues when compared with the city average.*
- *In Beeston you are likely to die on average 4 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 improve the management and safety of privately let properties. By introducing a selective licensing scheme, officers will gain access to 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 including areas such as employment and training; financial assistance via benefit checks and debt advice; help with access to services and support if dealing with poor landlords.

The consultation for selective licensing has shown that landlords and managing agents in the area are against the introduction of any scheme. Their main concerns are;

- The cost of the licence
- They see no benefit from the introduction of a scheme
- It does not cover the social sector which is, in their opinion, poorly managed.

The consultation has also shown that where residents and stakeholders had face to face discussions and completed the questionnaire they are in favour of the introduction of a

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.

Analysis of all consultation feedback from residents and stakeholders raised concerns regarding its integrity due to multiple responses from the same IP addresses. However there were some over-riding concerns;

- The increased cost of their rent and the impact on their household income
- The potential loss of homes due to eviction
- Concerns in some communities that they may be prejudiced due to several of the licence conditions, namely the need for references and ASB being used against them
- Selective licensing will not have the desired impact to address their concerns in relation to ASB; crime and poor landlord behaviour.

**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 a range of partners and community leaders to better engage with these communities. This will not happen overnight but will be an ongoing process as communities gain confidence in the scheme and ourselves.

**Action required:**

If introduced;

- To work closely with partners to ensure a full understanding of the issues faced by the communities involved
- To continue to work via the existing community networks to support those affected by any approved scheme
- To work with and support landlords to ensure an understanding of the 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:**

- Beeston Hill 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 representatives)
- Third sector housing providers (Canopy; LATCH and 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 local authority – Legal; Cleaner Neighbourhoods; Employment and Skills; 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 and tenants; private sector landlords and tenants; employed/unemployed

**Stakeholders**

<input checked="" type="checkbox"/>	<b>Services users</b>	<input checked="" type="checkbox"/>	<b>Employees</b>	<input type="checkbox"/>	<b>Trade Unions</b>
<input checked="" type="checkbox"/>	<b>Partners</b>	<input checked="" type="checkbox"/>	<b>Members</b>	<input type="checkbox"/>	<b>Suppliers</b>
<input checked="" type="checkbox"/>	<b>Other please specify</b>				

Landlords of all tenures; residents; stakeholders; Landlord Associations

**Potential barriers.**

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

**Please specify**

- Landlords may not have the funds to run their business; they may leave the sector thus reducing the supply of homes and increasing the number of empty homes
- Any licence fee costs may be passed on to the tenant
- Brexit – may impact upon the area due to the diverse community from the EU
- Partners - need to look at how they work and what difference they can make
- A diverse community with different language, different concerns, different fears etc. This will make the dissemination of information difficult, will need to work with partners to make this work

- Significant poverty affecting communities – need to look at ways to take people out of poverty via joint working and a better offer

## **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 – the licence conditions are 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 legislation in order to avoid formal action
- Closer working with the sector – especially good landlords – to help them improve their businesses and support them when addressing problems with their properties and/or tenants
- The ability to target poor/criminal landlords who may blight the area
- Working with partners to address the wider issues of deprivation in the area – 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
- The supporting of tenants as properties are proactively visited – the fear of reporting poor housing conditions will be removed
- Working with tenants to ensure they know their rights and the standards they should expect from their landlord
- An improved neighbourhood for all by improved action to address crime, ASB and poor environmental factors

### **Action required:**

- To continue to develop partnerships to allow the better use of resources and different ways 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 of them
- 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 tenants. Whilst the overall market rent will serve to limit to any rent increase it may put tenants in financial hardship or cause them to move to other parts of the city with lower 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; they will not occur overnight. It 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 and/or they may be 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
- To work with Leeds Housing Options to address homelessness/prosecute for illegal evictions
- To work with the Empty Homes team to target all empty homes in the area, including the use of buy back and compulsory purchase orders
- To have quick wins, eg targeting non-compliant landlords at the start of the scheme; looking at an initiative to make a quick difference to the area that can be instigated when any designation comes into force
- 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, eg. Cleaner Neighbourhoods to address environmental

issues and external partners, eg. the Police as part of a wider initiatives to address crime and criminality in the area.

Closer working with all partners, including landlords, letting and managing agents and the community to enhance and develop relationships and networks.

**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.
- To work more closely with the sector to better understand their business needs and supporting the sector through for example the provision of advice and guidance

**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 and the 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 poor 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"> <li>• To work with partner organisations to work with their client groups to support their needs</li> <li>• To work with the Leeds Rental Standard to support landlords</li> <li>• To look to support vulnerable individuals and communities and meet their needs by ensuring their needs are met as part of the delivery of the scheme – work in partnership with others to better target resources to meet need</li> </ul>	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 Migrant 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 we are aware of all stakeholders involved with 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>

<b>Action</b>	<b>Timescale</b>	<b>Measure</b>	<b>Lead person</b>
Ensure there is a comprehensive communication plan in place.	Thorough communications put in place prior to the implementation and then ongoing throughout the life of the scheme.	Feedback from stakeholders and 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 <sup>th</sup> June 2019
<b>Date impact assessment completed</b>		<b>14<sup>th</sup> June 2019</b>

**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](mailto: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 <b>Governance Services</b>	Date sent: 17 <sup>th</sup> June 2019
For Delegated Decisions or Significant Operational Decisions – sent to appropriate <b>Directorate</b>	Date sent:
All other decisions – sent to <a href="mailto:equalityteam@leeds.gov.uk">equalityteam@leeds.gov.uk</a>	Date sent: