

**Coventry City Council
Equality and Consultation Analysis (ECA) Form**

In line with the principles of decision making outlined in the City Council Constitution, the Council will ensure that its decision making is open and transparent, and that due regard is given to the Council's obligations and desire to promote equality of opportunity and equal treatment.

Form 1

This part must be completed and before formal consultation is undertaken and must be available during the consultation stage.

Author of this document: Adrian Chowns

Name of Service Area/Proposal: Regulatory Services – Review of Private Sector Housing Enforcement Policy 2022

Head of Service: Andrew Walster

Date of completion: September 2022

Background to the planned changes

1. What is the background to the planned changes? Why is this change being considered?

New and updated legislation has been provided by Government to deal with certain offences regarding housing in the Private Rented Sector, which can be pursued by the Council to address poor housing conditions and rogue landlords.

In order for the Council to use these powers it must have reviewed and updated its policy setting out how it will implement these powers in relation to properties in the PRS. The original policy was approved in 2018 and reviewed in 2021 and since that time new powers have been introduced that are now incorporated into the policy document.

This report provides the details of this review and the new powers included in the revised policy.

2. Who do you need to consider as part of this ECA? **stakeholder analysis*

Landlords
Agents
Tenants in the Private Rented Sector
Residents living in the city.

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Pre-Consultation Engagement

This section refers to any activities that took place (such as briefings, meetings, workshops, scoping exercises etc) with stakeholders before the formal consultation period.

3. What engagement activities took place prior to formal consultation and what feedback (if any) was received in relation to equality issues?

There is no requirement to conduct a consultation exercise because the process for implementing civil penalties is set out in Government guidance which was developed as part of a national consultation exercise by the Government.

Analysis of Impact

In this section please ensure that you consider the three aims of the general duty as they affect **protected groups**. These groups are:

Age
Disability
Gender
Gender reassignment
Marriage/Civil Partnership
Pregnancy/Maternity
Race
Religion/Belief
Sexual Orientation

The **three aims of the general duty** require that a public authority, in the exercise of its functions, must have due regard to the need to:

- Eliminate discrimination, harassment and victimisation
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it

The Policy will not have a negative impact on any protected groups as it not specific to:-

- Age
- Disability
- Gender
- Gender reassignment
- Marriage/Civil Partnership
- Pregnancy/Maternity
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The adoption of the new powers and the civil penalties will have a positive impact upon all groups. The use of civil penalties and other enforcement action detailed in the policy will enable the Council to take formal enforcement action against rogue landlords.

- 4. Outline below how this proposal/review could impact on protected groups positively or negatively, and what steps/mitigations (if any) could be taken to reduce any negative impact that has been identified.**

Note – when identifying potential impacts below, please only include impacts that may exist over and above general impacts that may affect the wider community/population. (For example, a reduction in grant to Coventry Citizens Advice would affect all service users through a reduced level of first line advice being available to all – but it would affect the following groups more; age, disability, gender and race as they represent a larger proportion of the clients who use the advice service.)

The amendment of the policy for enforcing standards in private sector housing will enable the Council to implement a wider range of powers available to them, providing a holistic approach to dealing with problems in the private rented sector. In doing so the Council will be improving the standard and management of properties in the private rented sector and sending out a positive message to landlords that it takes the issue of poor housing extremely seriously.

- 5. Are there any other vulnerable groups that could be affected?** i.e. deprivation, looked after children, carers.

Also include any information about the health inequalities/Marmot implications of this proposal. Contact Caroline Ryder (caroline.ryder@coventry.gov.uk) or Hannah Watts (hannah.watts@coventry.gov.uk) in Public Health for more information.

Housing is a key determinant of health and cold, damp, unsafe homes impact on all groups but particularly the young and old. By improving standards in privately rented properties the occupants will potentially benefit from a direct improvement in health and be at less risk of accidents.

- 6. What are the gaps in evidence? Can this be addressed during the consultation stage?**

In this section, re-state those protected characteristics for which there is no data available. In addition, outline if there are any plans to collect further data during the consultation stage (through surveys, on-site sampling etc). If it is unlikely that additional data will be available to inform this ECA, then include a commitment statement in this section along the lines of 'following on from this ECA, once the new service is implemented/commissioning process undertaken, a specific requirement to collect and analyse relevant equalities data will be included in management information processes / service specifications*'. *delete as appropriate*

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- 7. What are the likely impacts of this project/review on staff from protected groups?** For further support please contact Andy Hyland (andy.hyland@coventry.gov.uk tel: 7683 3426)

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Form 2

This section should be completed AFTER any consultation has been concluded.

Author of this document:

Date of completion:

Potential Impacts – further information

8. Referring to the information detailed in question 4 of ECA Form 1, state if the potential impacts have been confirmed. Also detail below any additional information about potential impacts that has been highlighted during any consultation.

Outcome of equality impact

9. Indicate which of the following best describes the equality impact of this project/review:

There will be **no** equality impact if the proposed option is implemented

There will be **positive** equality impact if the proposed option is implemented

There will be **negative** equality impact if the proposed option is implemented but this can be objectively justified

There will be both **positive and negative** impacts if the proposed option is implemented

Summary of ECA

Write a paragraph below which summarises the key aspects of this ECA.

This paragraph should be included in the Equalities/EIA section of any Cabinet/Cabinet Member Report.

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Approvals from Director and Cabinet Member

Name of ECA Author: Adrian Chowns

Date: 5th September 2022

Director: Andrew Walster

Cabinet Member: Councillor David Welsh and Councillor
Abdul Khan

Please detail below any committees, boards or panels that have considered this analysis.

Name	Date	Chair	Decision taken
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Next steps

Please send this completed ECA to the Insight Team as follows:

Wendy Ohandjanian (wendy.ohandjanian@coventry.gov.uk tel. 7683 2939)

Jaspal Mann (jaspal.mann@coventry.gov.uk tel. 7683 3112)