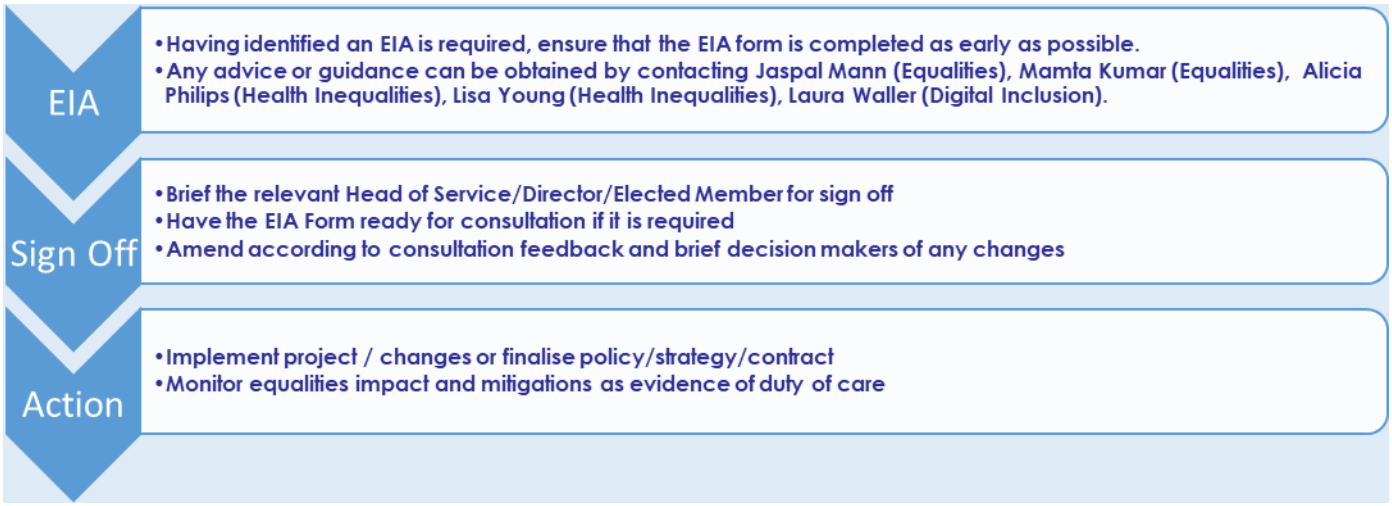
EQUALITY IMPACT ASSESSMENT (EIA)

APPENDIX 2

Coventry City Council

Title of EIA		**HMO licensing consultation**
EIA Author	Name	**Steven Chantler**
	Position	**Principal Environmental Health Officer**
	Date of completion	**18/5/23**
Head of Service	Name	**Davina Blackburn**
	Position	**Strategic Lead of Regulation**
Cabinet Member	Name	**David Welsh**
	Portfolio	**Cabinet Member for Housing and Communities**



PLEASE REFER TO EIA GUIDANCE FOR ADVICE ON COMPLETING THIS FORM

SECTION 1 – Context & Background

1.1 Please tick one of the following options:

This EIA is being carried out on:

☐New policy / strategy
☐New service
☒Review of policy / strategy
☐Review of service
☐Commissioning
☐Other project *(please give details)*

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1.2 In summary, what is the background to this EIA?

Coventry City Council implemented a city-wide HMO additional licensing scheme on 4 May 2020, which required all HMOs in the city to be licensed.

The council has a duty to carry out a review of any discretionary licensing scheme it has implemented to determine if it is achieving the aim of improving management standards and property conditions for the tenants that live there. The scheme is now reaching its third year and as such this is an appropriate time to review it. The outcome of this review will help measure the effectiveness so far and will assist in informing a future decision on the renewal of any scheme designation.

The review is also intended to lead to service improvements within the remaining life of the existing scheme and for any future scheme and will provide a positive way of engaging with partners, both internal and external, landlords and tenants, and as such has the additional benefit of raising awareness of HMO licensing.

1.3 Who are the main stakeholders involved? Who will be affected?

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

1.4 Who will be responsible for implementing the findings of this EIA?

The Property Licensing Team

SECTION 2 – Consideration of Impact

Refer to guidance note for more detailed advice on completing this section.

In order to ensure that we do not discriminate in the way our activities are designed, developed and delivered, we must look at our duty to:

- Eliminate discrimination, harassment, victimisation and any other conflict that is prohibited by the Equality Act 2010

- Advance equality of opportunity between two persons who share a relevant protected characteristic and those who do not
- Foster good relations between persons who share a relevant protected characteristic and those who do not

2.1 Baseline data and information

Please include a summary of data analysis below, using both your own service level management information and also drawing comparisons with local data where necessary (go to https://www.coventry.gov.uk/factsaboutcoventry)

We are now half way through the scheme and have collected a lot of data in relation to property improvements that have been made to the properties in terms of repair and maintenance, which will be baselined from the scheme's inception. The review and consultation process will seek to speak steakholders to guage their satisfaction of the scheme and what impact it has made to their lives.

2.2 On the basis of evidence, complete the table below to show what the potential impact is for each of the protected groups.

- Positive impact (P),
- Negative impact (N)
- Both positive and negative impacts (PN)
- No impact (NI)
- Insufficient data (ID)

Any impact on the Council workforce should be included under question 2.6 – **not below*

Protected Characteristic	**Impact type** P, N, PN, NI	**Nature of impact and any mitigations required**
Age 0-18	**P**	Improved housing conditions

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Age 19-64	**P**	Improved housing conditions
Age 65+	**P**	Improved housing conditions
Disability	**P**	Improved housing conditions
Gender reassignment	**P**	Improved housing conditions
Marriage and Civil Partnership	**P**	Improved housing conditions
Pregnancy and maternity	**P**	Improved housing conditions
Race (Including: colour, nationality, citizenship ethnic or national origins)	**P**	Improved housing conditions
Religion and belief	**P**	Improved housing conditions
Sex	**P**	Improved housing conditions
Sexual orientation	**P**	Improved housing conditions

HEALTH INEQUALITIES

2.3	Health inequalities (HI) are unjust differences in health and wellbeing between different groups of people which arise because of the conditions in which we are born, grow, live, work and age. These conditions influence our opportunities for good health, and result in stark differences in how long we live and how many years we live in good health. Many issues can have an impact: income, unemployment, work conditions, education and skills, our living situation, individual characteristics and experiences, such as age, gender, disability and ethnicity A wide range of services can make a difference to reducing health inequalities. Whether you work with children and young people, design roads or infrastructure, support people into employment or deal with welfare benefits – policy decisions and strategies can help to reduce health inequalities **Please answer the questions below to help identify if the area of work will have any impact on health inequalities, positive or negative.** **If you need assistance in completing this section please contact: Alicia Philips or Lisa Young in Public Health for more information. More details and worked examples can be found at** https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx

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Question	Issues to consider	
2.3a What HIs exist in relation to your work / plan / strategy	• Explore existing data sources on the distribution of health across different population groups *(examples of where to find data to be included in support materials)* • Consider protected characteristics and different dimensions of HI such as socio-economic status or geographical deprivation	
	Response:	
2.3b How might your work affect HI (positively or negatively). How might your work address the needs of different groups that share protected characteristics	**Consider and answer below:** • Think about whether outcomes vary across groups and who benefits the most and least, for example, the outcome for a woman on a low income may be different to the outcome for a woman a high income • Consider what the unintended consequences of your work might be	
	Response: a. Potential outcomes including impact based on socio-economic status or geographical deprivation	
	b. Potential outcomes impact on specific socially excluded or vulnerable groups eg. people experiencing homelessness, prison leavers, young people leaving care, members of the armed forces community. The review will enable the Council to continue improving the standards and management of HMO's in Coventry thus continuing to prevent issues of overcrowding and ensuring such properties are safe and well manged.	

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2.4 Next steps - What specific actions will you take to address the potential equality impacts and health inequalities identified above?

The HMO licensing scheme is city wide and aimed at improving some of the poorest accomadtion in the city and in the event that the review identifies areas of inequality, then a resource can be deployed in those areas to address specific problems.

DIGITAL INCLUSION

2.5

The Covid-19 pandemic accelerated the uptake of digital services nationally, whereby people who are digitally enabled have better financial opportunities, can access new information and are better connected to others (Lloyds Consumer Digital Index, 2021). However, for those who are digitally excluded, the digital divide has grown during the last two years, and without intervention people will be left behind with poorer outcomes across employment, health and wellbeing, education and service access. Some people are more likely to be excluded including: older people, people from lower income households, unemployed people, people living in social housing, disabled people, school leavers before 16 with fewer educational qualifications, those living in rural areas, homeless people, or people who's first language is not English (NHS Digital.)

Some of the barriers to digital inclusion can include lack of:

- **Access** to a device and/or data
- **Digital skills**
- **Motivation** to get online
- **Trust** of online safety

Digital exclusion is not a fixed entity and may look different to different people at different times.

Example 1. Person A, has access to a smartphone and monthly data and can access social media apps, however lacks the digital skills and confidence, and appropriate device to create a CV, apply for jobs and attend remote interviews, and/or access educational and skills resources.

Example 2. Person B, is digitally confident and has their own laptop, however due a lower household income and other financial priorities, they cannot afford their monthly broadband subscription and can no longer get online to access the services they need to.

Example 3. Person C has very little digital experience and has heard negative stories on the news regarding online scams. Despite having the financial resource, they see no benefit of being online and look for alternatives whenever possible. A new council service requires mandatory online registration, therefore they do not access it.

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	It is important that we all consider how we can reduce digital inequalities across our services, and this may look very different depending on the nature of our work. **Please answer the questions below to help identify if the area of work will have any impact on digital inequalities, positive or negative.** **If you need assistance in completing this section please contact: Laura Waller (*Digital Services & Inclusion Lead, CCC*). More details and worked examples can be found at** https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx

Question	Issues to consider	
2.5 What digital inequalities exist in relation to your work / plan / strategy?	• Does your work assume service users have digital access and skills? • Do outcomes vary across groups, for example digitally excluded people benefit the least compared to those who have digital skills and access? • Consider what the unintended consequences of your work might be.	
	Response: The review will contain a digital questionnaire, which may not be accessible to everyone.	
2.5b How will you mitigate against digital inequalities?	• If any digital inequalities are identified how can you reduce these? For e.g. if a new service requires online registration you may work with partner organisations to improve digital skills and ensure equitable processes are available if someone is unable to access online.	
	Response: Face to face meetings have been arranged in all wards in the city in the evenings, which will ensure that hand written or face to face interviews casn be undertaken.	

2.6 How will you monitor and evaluate the effect of this work?

A full appraisal of the information collated will be undertaken to ensure the HMO licensing scheme is reaching far and wide and fufuilling its purpose of improving housing conditions acrtoos the the city for

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all.

2.7 Will there be any potential impacts on Council staff from protected groups?

No

You should only include the following data if this area of work will potentially have an impact on Council staff. This can be obtained from: Nicole.Powell@coventry.gov.uk

Headcount:

Sex:

Female	
Male	

Age:

16-24	
25-34	
35-44	
45-54	
55-64	
65+	

Disability:

Disabled	
Not Disabled	
Prefer not to state	
Unknown	

Ethnicity:

White	
Black, Asian, Minority Ethnic	
Prefer not to state	
Unknown	

Religion:

Any other	
Buddhist	
Christian	
Hindu	
Jewish	
Muslim	
No religion	
Sikh	
Prefer not to state	
Unknown	

Sexual Orientation:

Heterosexual	
LGBT+	
Prefer not to state	
Unknown	

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3.0 Completion Statement

As the appropriate Head of Service for this area, I confirm that the potential equality impact is as follows:
No impact has been identified for one or more protected groups ☐
Positive impact has been identified for one or more protected groups ☐
Negative impact has been identified for one or more protected groups ☐
Both positive and negative impact has been identified for one or more protected groups ☐

4.0 Approval

Signed: Head of Service:	**Date:**
Name of Director: Andrew Walster	**Date sent to Director:**
Name of Lead Elected Member: David Welsh	**Date sent to Councillor:**

Email completed EIA to equality@coventry.gov.uk