



Equality Impact Assessment

**EIA-795626658 - Private Sector Housing Enforcement Policy
2026-2031**

Details

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| Title | Private Sector Housing Enforcement Policy 2026-2031 |
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| Head of Service | Davina Blackburn (Strategic Lead - Regulation and Communities) |
| Cabinet Member | Councillor Naeem Akhtar and Councillor Abdul S Khan (Policing and Equalities) |
| Director | Julie Newman (Law and Governance) |

Context and background

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| EIA carried out on | Review of policy or strategy |
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New and updated legislation in the form of the Renters Rights Act 2025 has been provided by Government to deal with certain offences regarding housing in the Private Rented and Social Housing sectors.

In order for the Council to use these powers, it must have reviewed and updated its enforcement policy setting out how it will implement these powers in relation to properties in the PRS and social housing. 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 amended policy document.

Background

Before the introduction of the Renters Rights Act, landlords had more freedom to raise rent multiple times, and notice periods varied and were sometimes shorter. Rent reviews were often tied to fixed-term renewals and tenants felt unsure about challenging increases due to the fear of retaliatory eviction.

After the new provisions of the Act are introduced (1st May 2026) there will be stricter controls on the rent increases, with landlords only being allowed to do this once per year, as well as stronger protections in relation to the eviction process and tenancy reforms which improve security of tenure and create fairness in the private rented sector.

Stakeholders

Internal services
Regulatory Services
Planning
Housing and Homelessness

External
Housing Associations
Landlords
Tenants
Managing/Letting Agents
Residents
Police
Citizens Advice
Advisory bodies

Responsibility

Safer Housing and Communities service

Consideration of impact

Baseline data and information

The growth of the PRS has been a significant change in the housing market in Coventry. In 2011 there were 21% of households living in the PRS which rose to 33% (48,708) in 2021. The percentage of PRS properties in each ward ranges from between 67% (St Michaels) to 17% (Bablake). 16 out of the 18 wards in Coventry have a higher percentage of PRS than that of the national average (19%).

In 2022 the Council carried out a stock survey of the PRS which found that:

- Coventry is the 64th most deprived local authority out of the 333 in England.
- Coventry has a high proportion of high deprivation wards. 9 out of 18 wards have IMD rankings below the national average and 3 wards are in the lowest 30% nationally.
- There are over 11,000 private rented properties in Coventry that are likely to have a serious Category 1 hazard. This equates to 23% of the PRS stock meaning 1 in 3 privately rented homes is likely to have a serious home hazard, almost double that of the national average.
- 898 PRS properties have F and G energy performance rating - fail statutory minimum requirements.
- There are a significantly higher proportion of PRS properties in fuel poverty (18.5%) than nationally (13.8%).

The Renters Rights Act 2025 is designed to improve the private renting experience for landlords and tenants. The details of the new powers are detailed in the policy and approval will ensure the Council meets its statutory duty to enforce the legislation.

Marmot Principles

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| 1. Give every child the best start in life |
| 3. Ensure a healthy standard of living for all |
| 5. Create and develop healthy and sustainable places and communities |
| 8. Pursue environmental sustainability and health equity |

Protected groups - Impact on Coventry Residents and Visitors

Age 0-18

Positive impact - Positive impact - The implementation of the policy will ensure the

Council fulfils its statutory duty in relation to the Renters Rights Act, which will provide greater housing security for families. The Council has been provided stronger powers to enforce compliance and tackle rogue landlords.

The Act abolishes Section 21 "no-fault" evictions, meaning landlords can no longer evict tenants without a valid reason. For children and young people, this translates into more stable living environments, as families with children will not face sudden displacement, reducing disruption to schooling and social networks.

There will also be a lower risk of homelessness, as more security of tenure helps prevent situations where families with minors are forced into temporary accommodation or sofa-surfing.

The provisions relating to "Protection Against Discrimination" explicitly bans discrimination against tenants with children or those receiving benefits. This is crucial because families with children often faced barriers in accessing private rentals due to blanket bans. By removing these barriers, the Act ensures equal access to housing, supporting children's right to a safe home.

Furthermore, the duties placed on the Council will enable it to improve housing standards to ensure properties meet minimum quality standards, reducing health risks such as damp and mould.

This is particularly important for children, as poor housing conditions are linked to respiratory illnesses and developmental issues.

The Act also caps advance rent requests and bans rental bidding wars. For families with limited income, this will result in lower upfront costs, making it easier to secure housing whilst reducing the financial stress.

Stable, safe, and affordable housing is foundational for children's health, education, and emotional well-being. By reducing eviction risks, improving housing standards, and banning discriminatory practices, the Council can create a more secure environment for young people to thrive.

Age 19-64

Positive impact - Positive impact - This age range often includes working professionals, parents, and those transitioning between life stages. The Act supports:

Career mobility: Flexible tenancies allow relocation without penalties.

Financial resilience: Predictable rent and lower upfront costs ease budgeting.

Health and wellbeing: Safer, better-quality homes reduce stress and illness.

As above in relation to greater security and stability, reducing homelessness risk, financial protections, improved housing standards, stronger enforcement and redress and impartial resolution of disputes without costly court action.

Local authority enforcement powers: Tenants can rely on councils to tackle rogue landlords and unsafe housing.

Inclusivity and Equal Access

Ban on discrimination: Landlords cannot refuse tenants based on benefits or family status, ensuring fair access for single adults, couples, and families.

Pet ownership rights: Adults can request to keep pets, improving wellbeing and flexibility.

Age 65+

Positive impact - Positive impact - Older renters are the fastest-growing segment in the rental market, often choosing to rent for flexibility, downsizing, or avoiding home maintenance burdens. The Act ensures:

- * Health and wellbeing: Safer, warmer homes reduce hospital admissions.
- * Financial security: Predictable costs and reduced upfront payments ease budgeting.
- * Dignity and independence: Strong protections allow older adults to age in place without fear of eviction.

Older adults often face anxiety about sudden displacement. The Act abolishes Section 21 “no-fault” evictions, meaning:

- * Tenancies can only end for valid reasons, reducing the risk of abrupt moves.
- * This stability is crucial for older renters who value continuity for health, social ties, and access to local services.

Improved Housing Standards - The Act introduces the Decent Homes Standard into the private rented sector: Homes must meet minimum quality standards, tackling issues like damp, mould, and unsafe conditions. Older people are particularly vulnerable to cold and poor housing, which can exacerbate respiratory and mobility issues.

Disability

Positive impact - Positive impact - Disabled renters often face compounded challenges—limited housing options, higher risk of discrimination, and vulnerability to unsafe conditions. The Renters’ Rights Act addresses these by:
Creating a fairer, more inclusive rental market.
Improving housing quality and security.
Providing accessible enforcement routes without costly litigation.

Gender reassignment

Positive impact - Positive impact - People undergoing gender reassignment often face heightened risks of housing discrimination and instability. The Renters’ Rights Act addresses these by:
Creating a fairer, more inclusive rental market.
Providing robust enforcement and accessible dispute resolution.
Supporting continuity and wellbeing during a critical life stage.
The Act reinforces existing equality protections under the Equality Act 2010, making it unlawful for landlords or agents to discriminate against tenants based on gender reassignment.
It bans blanket policies that indirectly discriminate, such as refusing tenants on benefits or imposing arbitrary restrictions that disproportionately affect marginalised groups.
Tenants who experience discrimination can seek redress through the new Private Rented Sector Ombudsman, offering a quicker and less costly alternative to court action.
The Council will have stronger enforcement powers to protect the rights of people undergoing gender reassignment.

Marriage and civil partnership

Positive impact - Positive impact - The Act supports stability, affordability, and fairness—key priorities for couples building a life together. It reduces financial stress, improves housing quality, and ensures equal treatment in the rental market.

Pregnancy and maternity

Positive impact - Positive impact - Pregnancy is a protected characteristic under equality and housing laws. The Renters’ Rights Act strengthens these protections by:
Creating a fairer, more inclusive rental market.
Providing stability and security during a critical life stage.
Ensuring safe, decent housing for maternal health and wellbeing.

Race

Positive impact - Positive impact - The Act reinforces existing equality laws, making it unlawful for landlords or agents to discriminate based on race or ethnicity.

It bans indirect discriminatory practices, such as blanket bans on certain groups or benefit recipients, which often disproportionately affect minority communities.

Tenants who experience discrimination can seek redress through the new Private Rented Sector Ombudsman, offering a quicker and less costly alternative to court action.

The Council has stronger powers to enforce compliance and protect vulnerable tenants.

The Ombudsman provides an impartial route for resolving disputes, ensuring equal access to justice for all racial groups.

People from minority ethnic backgrounds often face higher risks of discrimination, overcrowding, and poor housing conditions. The Renters' Rights Act addresses these issues by:

- Creating a fairer, more inclusive rental market.
- Improving housing quality and security.
- Providing robust enforcement and accessible dispute resolution.

Religion and belief

Positive impact - Positive impact - People of different religions and beliefs often face subtle or overt discrimination in the rental market. The Renters' Rights Act addresses these issues by:

- Creating a fairer, more inclusive rental environment.
- Providing robust enforcement and accessible dispute resolution.
- Supporting stability and respect for cultural and religious practices.

The Act reinforces existing equality laws, making it unlawful for landlords or agents to discriminate against tenants based on religion or belief.

It bans indirect discriminatory practices, such as blanket restrictions that could disproportionately affect certain faith groups.

Tenants who experience discrimination can seek redress through the new Private Rented Sector Ombudsman, offering a quicker and less costly alternative to court action.

The Council has stronger enforcement powers to support this group.

Sex

Positive impact - Positive impact - People of different sexes may experience systemic inequalities in income, employment, and housing access. The Renters' Rights Act addresses these issues by:

- Creating a fairer, more inclusive rental market.
- Providing robust enforcement and accessible dispute resolution.
- Supporting stability and equal opportunity for all tenants.

Sexual orientation Positive impact - Positive impact - People of different sexual orientations often face subtle or overt discrimination in the rental market. The Renters' Rights Act addresses these issues by:
Creating a fairer, more inclusive rental environment.
Providing robust enforcement and accessible dispute resolution.
Supporting stability and equal opportunity for all tenants.

Additional groups

Care experienced Positive impact - Positive impact - Carers often experience housing insecurity and financial strain while supporting dependants. The Renters' Rights Act addresses these challenges by:
Creating a fairer, more inclusive rental market.
Ensuring safe, stable housing for those providing and receiving care.
Offering accessible enforcement mechanisms to uphold rights.

Armed forces Positive impact - Positive impact - Service personnel and their families often face unique housing challenges due to frequent relocations and deployments. The Renters' Rights Act addresses these by:
Offering flexibility and security in tenancy arrangements.
Ensuring fair treatment and decent living conditions.
Providing accessible enforcement mechanisms for peace of mind.

Socio economic groups Positive impact - Positive impact - Different socio-economic groups face varied challenges:
All income households will benefit from affordability measures and stronger protections against eviction.
Gain stability and predictability in rent, supporting long-term planning.
Enjoy improved standards and fair dispute resolution without unnecessary costs.
The Act creates a fairer, more inclusive rental market, reducing inequalities and promoting housing security for all.

Next steps

| Inequality | Action | Owner | Timescale |
|------------|--------|-------|-----------|
|------------|--------|-------|-----------|

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| Monitor and evaluation | <p>KPIs will be included within the Safer Housing and Communities performance management system, which will be used to monitor and evaluate the effectiveness of the services being provided to meet the requirements of the Act.</p> <p>A review of the effectiveness of the policy approach for the Council will be carried out in 2027.</p> |
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Impact on Council staff

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| Will there be an impact? | Yes |
| Nature of impact and any mitigation required | <p>The approval of the policy has the potential to impact the organisation in future years. Although the Safer Housing and Communities service has restructured to plan ahead as the legislation is introduced, there may be future potential human resource implications. These will be monitored and reviewed regularly and, where possible, mitigated through the use of New Burdens funding and income from civil penalties. The current duties will be carried out using existing resources; however, there may be a need to restructure the service in future years. Additional training will also be required which will be funded from income.</p> |

Impact on Council staff - Sex

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| Female | 40 |
| Male | 57 |

Impact on Council staff - Disability

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|-----------------|
| Disabled |
|-----------------|

| |
|----------------------------|
| Not disabled |
| Prefer not to state |
| Unknown |

Impact on Council staff - Ethnicity

| |
|--------------------------------------|
| White |
| Black, Asian, minority ethnic |
| Prefer not to state |
| Unknown |

Impact on Council staff - Sexual orientation

| |
|----------------------------|
| Heterosexual |
| LGBT+ |
| Prefer not to state |
| Unknown |

Impact on Council staff - Age

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

Impact on Council staff - Religion

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

Completion statement

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| Potential equality impact | Positive impact has been identified for one or more protected groups |
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