

# **Camden Council Equality Impact Assessment Form**

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Before beginning this equality impact assessment (EqIA) form, you should use the [EqIA screening tool](#) to decide whether you need to complete an EqIA for your activity and read the [EqIA guidance](#).

The term “activities” is used by the Council to mean a range of things, such as policies, projects, functions, services, staff restructures, major developments or planning applications.

Most significant activities that affect Council stakeholders will require an EqIA when they are in the planning stage. Many will also require an EqIA to monitor their impact on equality over time or if there is a significant change that prompts a review, such as in local demographics.

EqIAs help the Council to fulfil its legal obligations under the Equality Act’s public sector equality duty. The duty requires the Council to have due regard<sup>1</sup> to the need to:

- eliminate unlawful behaviour, such as discrimination, harassment and victimisation;
- promote equality of opportunity between those who share a protected characteristic and those who don’t; and
- promote good relations between people who share a protected characteristic and those who don’t.

The way that we demonstrate that we have due regard for these three aims, and therefore that we are complying with the public sector equality duty, is by undertaking an EqIA.

EqIAs will almost certainly be required when a new activity affecting people who share the protected characteristics is being developed and when reviewing or changing such activities.

They will also be likely required before and during any staff re-organisations.

An EqIA should be started at the beginning of a new activity and developed in parallel with it. Activities such as services and projects should also be regularly reviewed for their impact.

An EqIA should be revisited and updated to determine whether any planned positive impacts have been achieved and whether any identified negative impacts have been mitigated. You can indicate the version of the EqIA below.

For more complex enquiries on EqIAs, in the first instance please contact [equalities@camden.gov.uk](mailto:equalities@camden.gov.uk) where you will be able to receive dedicated support.

EqIAs should be signed off by the relevant sponsor, director or Head of Service.

<sup>1</sup> [Due regard](#) is a legal requirement and means that decision makers have to consider the equality implications of a proposal before a commissioning or policy decision has been made that may affect people who share each of the protected characteristics. Paying ‘due regard’ means giving a proportionate amount of resource to this analytical exercise relevant to the potential impact on equality.

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<b>Title of the activity</b>	
New borough-wide additional HMO licensing scheme designation	
<b>Officer accountable for the EqIA (e.g. director or project sponsor)</b>	
Full name:	Glendine Shepherd
Position:	Director of Housing
Directorate:	Housing
Email:	<a href="mailto:Glendine.shepherd@camden.gov.uk">Glendine.shepherd@camden.gov.uk</a>
<b>Lead person completing the EqIA (author)</b>	
Full name:	Darren Wilsher
Position:	Private Sector Hosuing Service Manager
Directorate:	Housing
Email:	<a href="mailto:Darren.wilsher@camden.gov.uk">Darren.wilsher@camden.gov.uk</a>
<b>Person reviewing the EqIA (reviewer)</b>	
Full name:	Gerry Crowley
Position:	Head of Housing Allocation, Lettings and Private Housing
Directorate:	Housing
Email:	Gerry.crowley@camden.gov.uk
<b>Version number and date of update: 1.0 18 November 2024</b>	

## Step 1: Clarifying aims

**1.a Is it a new activity or one that is under review or being changed?**

- New  
 Under review  
 Being changed

**1.b. Which groups are affected by this activity?**

- Staff  
 Residents  
 Contractors

Other (please detail):

Landlords and managing agents

**1.c Which Directorate does the activity fall under:**

- Supporting People  
 Supporting Communities  
 Corporate Services  
 More than one Directorate. Please specify:

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## 1.d Outline the aims/objectives/scope of the activity. (You should aim for a summary, rather than copying large amounts of text from elsewhere.)

Camden currently operates a discretionary borough-wide licensing scheme for houses in multiple occupation (HMO), with the current 5-year designation due to expire in December 2025. The council is proposing to introduce a new borough wide designation for a further five years, effective December 2025.

36% of households in Camden live in the private rented sector. The sector plays a crucial role in delivering housing in the borough. Private renters are more likely than any other tenure to live in a poor-quality home. The Council receives on average 750 complaints a year from private renters concerning their home, which is a small percentage of the 35,000 households in this sector. The small numbers are due to a mixture of challenges from lack of awareness of the support that Camden can provide, to a reluctance to report issues because of concerns around retaliatory eviction from landlords.

HMOs are a specific type of accommodation, where tenants will share at least one type of amenity, i.e. kitchen, bathroom. Due to the sharing nature of this accommodation there is an increased risk on renters from poor standards and management.

The proposed scheme seeks to ensure that all HMOs achieve Camden's minimum standards.

A report on the proposed statutory consultation on the scheme has been prepared for consideration by Cabinet on 15 January 2025. Cabinet are asked to note the findings of the review in HMO licensing and consider the proposed consultation of the new designation .

The objectives of the proposed new designation support the We Make Camden ambition:

- Everybody in Camden should have a place they call home

And associated challenges:

- Housing - Camden has enough decent, safe, warm, and family-friendly housing to support our communities.
- Safety - Everyone is safe at home and safe in our communities.

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A large, empty rectangular box with a thin black border, occupying most of the page. It is intended for the user to provide their response to the Equality Impact Assessment form.

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## Step 2: Data and evidence

What data do you have about the people affected by the activity, for example those who use a service? Where did you get that data from (existing data gathered generally) or have you gone out and got it and what does it say about the protected characteristics and the other characteristics about which the council is interested?

Is there currently any evidence of discrimination or disadvantage to the groups?

What will the impact of the changes be?

You should try to identify any data and/or evidence about people who have a **combination, or intersection, of two or more characteristics**. For example, homeless women, older disabled people or young Black men.

### 2.a Consider any relevant data and evidence in relation to all Equality Act protected characteristics:

- Age
- Disability, including family carers<sup>2</sup>
- Gender reassignment<sup>3</sup>
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

#### Age

Camden has a relatively young population, with 83% of private renters in Camden in the 16 to 49 years age bracket, with only 4.9% aged 65 years or older. This is double the percentage of owner occupiers (40%) or social renters (38%) in this age group.

14% of private rented sector households have dependent children (owner occupied - 30%, social renter - 29%).

(data Census 2021)

Camden has the the 3rd largest student population in London, with just under 30,000 in higher education, of which 75% are in the private rented sector.

2 This is the legal term in the Equality Act. In practice there are specific legal protections for a diverse range of people who have physical, mental and sensory impairments, long-term health conditions and/or neurodivergence, as well as carers who provide unpaid care for a friend or family member who cannot function without their support. Census and local datasets use the Equality Act definition and will include people who may not use the language of disability to describe themselves.

3 This is the legal term in the Equality Act. In practice there are specific legal protections for anyone whose gender identity does not match the sex they were assigned at birth. This means, for example, that people who are trans and people who are non-binary or gender fluid are considered a specific protected group under the Equality Act.

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**Disability, including family carers**

Census 2021 data records that 23.2% of households in Camden have at least one person that is disabled (72.4% of households have no disabled persons).

**Gender reassignment**

No data.

**Marriage and civil partnership**

Data only available for all tenure types from Census 2021. The number of adults who were married or in a civil partnership in Camden increased by 0.9% since the 2011 Census.

**Pregnancy and maternity**

No data

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## **Race**

40% of households in Camden are non-white, an increase of 6% since the 2011 Census. The number of non-white households in the private rented sector in Camden is 32%.

- Asian total 16% (18.7%)
- Black total 3% (10.4%)
- Mixed total 5% (5.7%)
- White total 68% (60.7%)
- Other total 7% (4.4%)

Figures in brackets are for all tenure types in Camden.

White households are overrepresented in the private rented sector in Camden.

## **Religion or belief**

Census 2021 data states that 54% of households in the private rented sector have one or more religions within the household. There is no breakdown by type of religion by tenure at local authority level.

All households in Camden data: No religion - 34%; Christian - 31%; Muslim - 16%; Jewish - 5%; Hindu - 2%; Buddhist - 1%.

The numbers of households in the private rented sector with no religion is 40% and is significantly higher than the London (21%) and England (28%) figures for the private rented sector.

## **Sex**

No data available

## **Sexual orientation**

Census 2021 indicates that the private rented sector sexual orientation profile is very similar to that of all households in Camden. 5% (7%) gay or lesbian; 4% (2%) bisexual and 80% (83%) straight or heterosexual (figures in brackets for all household tenure types).



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## Intersectional Groups

### 2.b Consider evidence in relation to the additional characteristics that the Council is concerned about:

- Foster carers
- Looked after children/care leavers
- Low-income households
- Refugees and asylum seekers
- Parents (of any gender, with children aged under 18)
- People who are homeless
- Private rental tenants in deprived areas
- Single parent households
- Social housing tenants
- Any other, please specify

#### Foster carers

No data available

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**Looked after children/care leavers**

No data available

**Low-income households**

No data available

**Refugees and asylum seekers**

No data available

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## **Parents (of any gender, with children aged under 18)**

14% of private rented sector households have dependent children (owner occupied - 30%, social renter - 29%).

## **People who are homeless**

No data available

## **Private rental tenants in deprived areas**

Only data available is for 2019 and for all households in Camden, unable to drill into tenure.

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**Single parent households**

No data available

**Social housing tenants** No data/not relevant

**Any other, please specify**

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**2.c Have you found any data or evidence about intersectionality. This could be statistically significant data on disproportionality or evidence of disadvantage or discrimination for people who have a combination, or intersection, of two or more characteristics.**

None found

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## Step 3: Impact

Given the evidence listed in step 2, consider and describe what potential **positive and negative impacts** this work could have on people, related to their **protected characteristics** and the **other characteristics** about which the Council is interested.

Make sure you think about all three aims of the public sector equality duty. Have you identified any actual or potential discrimination against one or more groups? How could you have a positive impact on advancing equality of opportunity for a particular group? Are there opportunities within the activity to promote “good relations” – a better understanding or relationship between people who share a protected characteristic and others?

### 3.a Potential negative impact on protected characteristics

Protected Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Age	No	
Disability including carers	No	
Gender reassignment	No	
Marriage/civil partnership	No	

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Protected Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Pregnancy/ maternity	No	
Race	No	
Religion or belief	No	
Sex	No	
Sexual orientation	No	

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## 3.b Potential positive impact on protected characteristics

Protected Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Age	Yes	The proposed borough wide additional HMO licensing scheme will have a positive impact on standards within Camden's private rented sector for residents of all ages. Through Camden's Private Rented Sector Partners group the council is able to work with key stakeholders that support various age groups, e.g. University Accommodation Service (students); Age Concern (elderly tenants).
Disability including carers	Yes	The renewal of the borough wide additional HMO licensing scheme will result in a positive impact on standards within Camden's private rented sector. Additional health and safety hazards will be picked up via proactive inspections of licensable properties.
Gender reassignment	Yes	Scheme will lead to improvements in property standards and management of HMOs and minimise impacts on physical and mental health.
Marriage/civil partnership	Yes	Scheme will lead to improvements in property standards and management of HMOs and minimise impacts on physical and mental health.



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Protected Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Pregnancy/ maternity	Yes	Scheme will lead to improvements in property standards and management of HMOs and minimise impacts on physical and mental health.
Race	Yes	There is a lack of data and information about the demographic make-up of HMO occupants. However across the private rented sector, white renters are over represented. Scheme will lead to improvements in property standards and management of HMOs and minimise impacts on physical and mental health.
Religion or belief	Yes	Scheme will lead to improvements in property standards and management of HMOs and minimise impacts on physical and mental health.
Sex	Yes	Scheme will lead to improvements in property standards and management of HMOs and minimise impacts on physical and mental health.

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Protected Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Sexual orientation	Yes	Scheme will lead to improvements in property standards and management of HMOs and minimise impacts on physical and mental health.

### 3.c Potential negative impact on other characteristics

Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Foster carers	No	
Looked after children/care leavers	No	

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Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Low-income households	No	
Refugees and asylum seekers	No	
Parents (of any gender, with children aged under 18)	No	

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Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
People who are homeless	No	
Private rental tenants in deprived areas	No	
Single parent households	No	

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Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Social housing tenants	No	
Any other, please specify	No	

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## 3.d Potential positive impact on other characteristics

Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Foster carers	Yes	Scheme will lead to improvements in property standards and management of HMOs and minimise impacts on physical and mental health.
Looked after children/care leavers	Yes	Scheme will lead to improvements in property standards and management of HMOs and minimise impacts on physical and mental health.
Low-income households	Yes	Scheme will lead to improvements in property standards and management of HMOs and minimise impacts on physical and mental health.

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Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Refugees and asylum seekers	No	
Parents (of any gender, with children aged under 18)	Yes	Scheme will lead to improvements in property standards and management of HMOs and minimise impacts on tenants physical and mental health.
People who are homeless	No	

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Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Private rental tenants in deprived areas	Yes	Scheme will lead to improvements in property standards and management of HMOs and minimise impacts on tenants physical and mental health.
Single parent households	Yes	Scheme will lead to improvements in property standards and management of HMOs and minimise impacts on tenants physical and mental health.
Social housing tenants	No	
Any other, please specify	No	



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**3.e Consider intersectionality.**<sup>4</sup> Given the evidence listed in step 2, consider and describe any potential **positive and negative impacts** this activity could have on people who have a **combination, or intersection, of two or more characteristics**. For example, people who are young, trans and homeless, disabled people on low incomes, or Asian women.

The nature of the scheme is to improve standards within houses in multiple occupation in the private rented sector. Private renters will benefit from the schemes objectives, ensuring safe, healthy and well managed properties.

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<sup>4</sup> Intersectionality refers to the interconnected nature of social categorisations such as race, class, and gender as they apply to a given individual or group, regarded as creating overlapping and interdependent systems of discrimination or disadvantage.

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## Step 4: Engagement - co-production, involvement or consultation with those affected

### 4.a How have the opinions of people potentially affected by the activity, or those of organisations representing them, informed your work?

List the groups you intend to engage and reference any previous relevant activities, including relevant formal consultation? <sup>5</sup>	If engagement has taken place, what issues were raised in relation to one or more of the protected characteristics or the other characteristics about which the Council takes an interest, including multiple or intersecting impacts for people who have two or more of the relevant characteristics?
Private renters	Will be undertaking public consultation exercise on proposed new designation in January/ February 2025.
Landlords / managing agents	Will be undertaking public consultation exercise on proposed new designation in January/ February 2025.
Other Camden residents, stakeholders and neighbouring boroughs	Will be undertaking public consultation exercise on proposed new designation in January/ February 2025.

<sup>5</sup> This could include our staff networks, advisory groups and local community groups, advice agencies and charities.

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<b>List the groups you intend to engage and reference any previous relevant activities, including relevant formal consultation?<sup>5</sup></b>	<b>If engagement has taken place, what issues were raised in relation to one or more of the protected characteristics or the other characteristics about which the Council takes an interest, including multiple or intersecting impacts for people who have two or more of the relevant characteristics?</b>

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<b>List the groups you intend to engage and reference any previous relevant activities, including relevant formal consultation?<sup>5</sup></b>	<b>If engagement has taken place, what issues were raised in relation to one or more of the protected characteristics or the other characteristics about which the Council takes an interest, including multiple or intersecting impacts for people who have two or more of the relevant characteristics?</b>

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**4.b. Where relevant, record any engagement you have had with other teams or directorates within the Council and/or with external partners or suppliers that you are working with to deliver this activity. This is essential where the mitigations for any potential negative impacts rely on the delivery of work by other teams.**

We will be engaging with relevant stakeholders through the Councils Private Rented Sector Partners meeting, which consists of the following organisations:

- Camden Federation of Private Tenants
- Safer Renting
- University of London Housing Services
- Shelter
- Mary Ward Legal Centre
- Age UK Camden
- Citizens Advice Camden
- Camden Community Law Centre
- Flat Justice
- London Renters Union
- Justice for Tenants

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## Step 5: Informed decision-making

### 5. Having assessed the potential positive and/or negative impact of the activity, what do you propose to do next?

Please select one of the options below and provide a rationale (for most EqlAs this will be box 1). Remember to review this and consider any additional evidence from the operation of the activity.

<p><b>1. Change the activity to mitigate potential negative impacts identified and/or to include additional positive impacts that can address disproportionality or otherwise promote equality or good relations.</b></p>	
<p><b>2. Continue the work as it is because no potential negative impacts have been found</b></p>	<p>The borough wide additional HMO licensing scheme has been in operation for just under 9-years. There have been no negative impacts for Camden residents as a result of the scheme. Landlord's, may feel negatively impacted by the scheme as they have to pay a fee to license and may need to undertake works to their properties. However, the fee and works needed are necessary to ensure that HMOs meet Camden's minimum standards to protect the health, safety and welfare of private renters.</p>

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<p><b>3. Justify and continue the work despite negative impacts (please provide justification – this must be a proportionate means of achieving a legitimate aim)</b></p>	
<p><b>4. Stop the work because discrimination is unjustifiable and there is no obvious way to mitigate the negative impact</b></p>	

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## Step 6: Action planning

**6. You must address any negative impacts identified in steps 3 and/or 4. Please demonstrate how you will do this or record any actions already taken to do this.**

Please remember to add any positive actions you can take that further any potential or actual positive impacts identified in step 3 and 4.

Make sure you consult with or inform others who will need to deliver actions.

Action	Due	Owner
Not applicable		



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Action	Due	Owner

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## Step 7: EqIA Advisor

Ask a colleague, preferably in another team or directorate, to 'sense check' your approach to the EqIA and ask them to review the EqIA form before completing it.

They should be able to clearly understand from what you have recorded here the process you have undertaken to assess the equality impacts, what your analysis tells you about positive and negative actual or potential impact, and what decisions you have made and actions you have identified as a result.

They may make suggestions for evidence or impacts that you have not identified. If this happens, you should consider revising the EqIA form before completing this version and setting a date for its review.

If you feel you could benefit from further advice, please contact the Equalities service at [equalities@camden.gov.uk](mailto:equalities@camden.gov.uk)

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## Step 8: Sign-off

<b>EqIA author</b>	<b>Name</b> Darren Wilsher <b>Job title</b> Private Sector Housing Service Manager <b>Date</b> 16 December 2024 
<b>EqIA advisor / reviewer</b>	<b>Name</b> Gerry Crowley <b>Job title</b> Head of Housing Allocations, Lettings and Private Housing <b>Date</b> 19 December 2024 
<b>Senior accountable officer</b>	<b>Name</b> Glendine Shepherd <b>Job title</b> Director of Housing <b>Date</b> 20 December 2024 