

## Appendix 2

### Equality Impact Assessment

<b>Directorate:</b> Public Health and Public Protection	
<b>Service:</b> Housing Regulation	
<b>Name of Officer/s completing assessment:</b> Simon Beasley and Natalie Worley	
<b>Date of Assessment:</b> 12 <sup>th</sup> February 2026	
<b>Name of service/function or policy being assessed:</b> Discretionary Property Licensing	
1.	<p><b>What are the aims, objectives, outcomes, purpose of the policy, service change, function that you are assessing?</b></p> <ul style="list-style-type: none"><li>• An additional Borough-wide Houses in Multiple Occupation (HMO) licensing designation based on the criterion that the Council considers that a significant proportion of the HMOs that fall outside of the mandatory HMO licensing scheme are being managed ineffectively so as to give rise problems for the occupiers or members of the public. A significant number of housing hazards also exist in these HMOs. A predicted 1500 properties would fall under the proposed licensing designation.</li><li>• A selective licensing scheme covering all 21 wards of the Borough based on the poor housing conditions. The designation would cover 100% of private rented sector housing in the Borough which is predicted to be 14700 non-HMO properties.</li></ul> <p>Objectives of the proposed additional and selective licensing schemes are:</p> <ul style="list-style-type: none"><li>- Improved property standards: To ensure that properties meet minimum health, safety, and fire safety standards, including required gas, electrical, and amenity safety checks.</li><li>- Enhanced management standards: To hold landlords accountable for the management of their properties and to ensure that they are "fit and proper persons" to act as landlords.</li><li>- Reduced anti-social behaviour: To mitigate problems associated with, or arising from, poorly managed HMOs, such as noise, refuse issues, and anti-social behaviour.</li><li>- Enhanced tenant protection: To protect tenants (particularly in vulnerable groups) from unsafe, overcrowded, or substandard living conditions.</li><li>- Tackling rogue landlords: Identifying and enforcing against landlords who fail to comply with management standards or legal requirements.</li><li>- Targeted regulation: To fill the regulatory gap for smaller HMOs (those with 3 or 4 tenants)</li></ul>

	<p>- Environmental and area improvements: To make neighbourhoods cleaner and safer by requiring proper waste management arrangements to be in place.</p>
2.	<p><b>Who implements or delivers the policy, service or function? State if this is undertaken by more than one team, service, and department including any external partners.</b></p> <p>Predominantly the Council's Housing Regulation service and associated property licensing officers, with delivery of the schemes being supported by the Resilience and Enforcement, Community Safety, Corporate Fraud, and Planning Enforcement teams.</p>
3.	<p><b>Who will be affected by this proposal? For example who are the external/internal customers, communities, partners, stakeholders, the workforce etc. Please consider all of the protected characteristics listed (more information is available in the background information). Bear in mind that people affected by the proposals may well have more than one protected characteristic.</b></p> <p><b>Age:</b></p> <p>The Borough's population was made up of (Census 2021):</p> <p>0 to 15 = 25.0%  16-64 = 65.4%  65+ = 9.7%</p> <p>The Housing Health and Safety Rating System identifies vulnerable groups which includes the very young and older persons as being at a higher risk of harm due to poor property conditions. No negative impacts have been identified</p> <p><b>Disability:</b></p> <p>26.3% of Slough's household have one or disabled persons (Census 2021). Poor housing conditions can have a significant on physical health and mental well-being and compliance inspections may identify hazards that disproportionately affect disabled people.</p> <p><b>Gender Reassignment:</b></p> <p>0.4% of the Borough's population identify as trans (Census 2021). Trans tenants are more likely to experienced discrimination from landlords or agents, and are more likely to live in homes with damp or mould and had difficulties getting repairs done.</p>

**Marriage and Civil Partnership:**

50.7% of the Borough's population are married or in a civil partnership (Census 2021).

No direct negative or positive impacts have been identified, and residents who are married or in civil partnership are likely to benefit from a licensing scheme which aims to improve housing conditions and management standards along with the rest of the Borough's population.

**Pregnancy and maternity:**

Vulnerability increases during pregnancy and maternity, and rogue landlords may seek to take advantage of this. No negative impacts have been identified

**Race:**

In terms of race, the Borough's population is made up of (Berkshire Observatory):

- Asian, Asian British or Asian Welsh - 46.7%
- White - 36%
- Black, Black British, Black Welsh, Caribbean or African - 7.6%
- Mixed - 4%
- Other Ethnic Group - 5.6%

New migrants to the Borough are statistically more likely to be living in poor quality HMO or private rented accommodation, and may have limited understanding of the tenancy rights and obligations which make them more susceptible to be taking advantage of by rogue landlords. No negative impacts have been identified

**Religion and Belief:**

In terms of religion and belief, the Borough's population is made up of (Berkshire Observatory):

- Christian - 32%
- Muslim - 29.4%
- Sikh - 11.3%
- Hindu - 7.8%
- Buddhist - 0.5%
- Jewish - 0.1%

	<p>Other religion - 0.5%</p> <p>There is no evidence to indicate any specific positive impacts on those of a particular religion or belief beyond general improvement in housing conditions.</p> <p><b>Sex:</b></p> <p>The Borough's population is made up of (Berkshire Observatory):</p> <p>Female 50.2% Male 49.8%</p> <p>Women, particularly single women, will benefit from improved property conditions and the requirement that the licence holder must be "fit and proper". No negative impacts have been identified.</p> <p><b>Sexual orientation:</b></p> <p>1.9% (Census 2021) of the Borough's population identify as being LGBTQ+. Nationally, nearly one in five LGBTQ+ private rented tenants have experienced discrimination from landlords or agents. Additionally, 61% of LGBTQ+ renters have lived in homes with damp or mould, and 70% have struggled to get repairs done. No negative impacts have been identified</p> <p><b>Other</b></p> <p>Not applicable</p>
4.	<p>What are any likely positive impacts for the group/s identified in (3) above? You may wish to refer to the Equalities Duties detailed in the background information.</p> <p><b>Age</b></p> <p>The proposed licensing designations will positively impact the very young and older age groups by setting a minimum standard, ensuring compliance, and taking enforcement action where appropriate.</p> <p>Reduced anti-social behaviour will also benefit older residents who may feel more vulnerable.</p>

	<p><b>Disability</b></p> <p>Disabled persons are likely to benefit from a licensing scheme which aims to improve housing conditions and management standards along with the rest of the Borough's population.</p> <p>Those with mental health and drunk and alcohol problems are often disproportionately represented in HMO type accommodation, and the introduction of additional licensing will ensure a minimum standard of accommodation does not contribute towards worsening mental health.</p> <p><b>Pregnancy and maternity</b></p> <p>Vulnerability increases during pregnancy and maternity, and rogue landlords may seek to take advantage of this. Licensing will provide pregnant mothers and those with newborn babies' greater protection from harassment and illegal eviction due to the threat of their landlord having their licence revoked as they are no longer considered fit and proper.</p> <p>Safer, warmer homes reduce health risks for pregnant tenants and infants.</p> <p><b>Sexual orientation:</b></p> <p>Licensing can reduce exploitation and unsafe housing conditions that may disproportionately affect trans tenants.</p> <p><b>Race</b></p> <p>New migrants to the Borough are more likely to be living in HMO or private rented accommodation, and may have limited understanding of the tenancy rights and obligations which make them more susceptible to be taking advantage of by rogue landlords. Licensing will provide all races with greater protection from harassment and illegal eviction due to the threat of their landlord having their licence revoked as they are no longer considered fit and proper. It will also set a minimum standard meaning that all tenants can expect to live in a property which is compliant with licence conditions.</p>
5.	<p><b>What are the likely negative impacts for the group/s identified in (3) above? If so then are any particular groups affected more than others and why?</b></p> <p><b>Age</b></p> <p>An independent review of selective licensing in 2019 found that the frequent claim made that licensing increases rents, as landlords may pass on the costs of licensing to their tenant, was not supported by the evidence. The private rented sector is a competitive market and</p>

market forces mean that rents are set at a level the market will bear. In reality, in low quality properties, the rent is typically set by Local Housing Allowance rates. However, the Council acknowledges that licensing fees may be passed on to tenants through rent increases, which would disproportionately affect younger renters on low incomes.

**Disability**

Disabled landlords may experience difficulties in accessing the online licence application system.

**Religion and belief:**

Large households which are common in some faith groups may be affected if landlords avoid renting to them due to restrictions on the maximum occupancy of a property.

**Pregnancy and maternity:**

Potential rent increases may disproportionately affect single mothers, however the independent review of selective licensing found that market forces mean that rents are set at a level the market will bear. In reality, in low quality properties, the rent is typically set by Local Housing Allowance rates.

6. **Have the impacts identified in (4) and (5) above been assessed using up to date and reliable evidence and data? Please state evidence sources and conclusions drawn (e.g. survey results, customer complaints, monitoring data etc).**

Impacts have been assessed using data within:

- Berkshire Observatory
- Census 2021
- Private Rental Sector and Houses in Multiple Occupation: Housing Stock Condition and Stressors Report (February 2026)
- An Independent Review of the Use and Effectiveness of Selective Licensing (2019)

A further equality impact assessment will be completed after the consultation exercise (see response to question 7) with the results of the consultation being used to inform the assessment.

7.	<p><b>Have you engaged or consulted with any identified groups or individuals if necessary and what were the results, e.g. have the staff forums/unions/ community groups been involved?</b></p> <p>The Council will conduct a minimum 10-week consultation to gather feedback on the proposed discretionary property licensing schemes. This will include consultation with local residents including tenants, landlords and where appropriate their managing agents, and other members of the community who live or operate businesses or provide services within the proposed designation.</p> <p>The consultation will be undertaken using the Council's Citizen Space online consultation platform, with hard copies of the consultation report and questionnaire also being made available. The consultation will be publicised using the Council's usual communication channels and the Council will contact all existing and previously licensed landlord in the Borough to notify them of the consultation. In addition, neighbouring boroughs and partners such as the Police and Royal Berkshire Fire and Rescue Service will be contacted. A report will be brought back to this committee with the findings of the consultation for a decision to be made on implementation of the proposed scheme. Under Sections 56(3) and 80(9) Housing Act 2004 the Council must (and will) consider any representations made in accordance with the consultation.</p>
8.	<p><b>Have you considered the impact the policy might have on local community relations?</b></p> <p>Yes. Licensing will provide a level playing field between landlords, with the results of the schemes being publicised giving increased confidence to tenants and landlord that action is being taken by the Council to address licence breaches.</p>
9.	<p><b>What plans do you have in place, or are developing, that will mitigate any likely identified negative impacts? For example what plans, if any, will be put in place to reduce the impact?</b></p> <ul style="list-style-type: none"> <li>- Rent levels will be monitored post-implementation</li> <li>- Targeted communications towards older residents and younger renters</li> <li>- Targeted communications towards new migrants to the area</li> <li>- Signposting of tenants to appropriate support services</li> </ul>
10.	<p><b>What plans do you have in place to monitor the impact of the proposals once they have been implemented? (The full impact of the decision may only be known after the proposals have been implemented). Please see action plan below.</b></p> <p>Section 84 (3) of the Housing Act 2004 requires the Council to review the operation of property licensing schemes from time to time. As</p>

	<p>part of the best practice guidance, local authorities are requested to publish the outcome of any reviews that they undertake in respect of the schemes in a timely manner on their website. A review will be undertaken after the first year of operation and annually thereafter for the duration of the schemes (up to 5 years).</p>
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<b>What course of action does this EIA suggest you take? More than one of the following may apply</b>	✓
<b>Outcome 1: No major change required.</b> The EIA has not identified any potential for discrimination or adverse impact and all opportunities to promote equality have been taken	
<b>Outcome 2: Adjust the policy</b> to remove barriers identified by the EIA or better promote equality. Are you satisfied that the proposed adjustments will remove the barriers identified? (Complete action plan).	
<b>Outcome 3: Continue the policy</b> despite potential for adverse impact or missed opportunities to promote equality identified. You will need to ensure that the EIA clearly sets out the justifications for continuing with it. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact (see questions below). (Complete action plan).	✓
<b>Outcome 4: Stop and rethink</b> the policy when the EIA shows actual or potential unlawful discrimination. (Complete action plan).	

### Action Plan and Timetable for Implementation

At this stage a timetabled Action Plan should be developed to address any concerns/issues related to equality in the existing or proposed policy/service or function. This plan will need to be integrated into the appropriate Service/Business Plan.

Action	Target Groups	Lead Responsibility	Outcomes/Success Criteria	Monitoring & Evaluation	Target Date	Progress to Date
Monitor rent levels post implementation	<ul style="list-style-type: none"> <li>Age</li> <li>Pregnancy and maternity</li> </ul>	Property licensing	Rents do not increase as a result of the implementation of discretionary property licensing			
Monitor complaints and service requests for reports of discrimination	<ul style="list-style-type: none"> <li>Sexual orientation</li> </ul>	Property licensing	Where discrimination is identified, appropriate action is taken			
Targeted communications	<ul style="list-style-type: none"> <li>Disability</li> <li>Race</li> <li>Pregnancy and maternity</li> </ul>	Property licensing	Increase in reporting from the target groups identified			

	<ul style="list-style-type: none"> <li>• Sexual orientation</li> <li>• Gender</li> </ul>					
Signposting of tenants to appropriate support services	<ul style="list-style-type: none"> <li>• All</li> </ul>	Property licensing	Reduction in homelessness presentations from the private rented sector			

**Name:** Simon Beasley

**Signed:** **Simon Beasley** (Person completing the EIA)

**Name:** .....

**Signed:** .....( **Policy Lead if not same as above**)

**Date:** 13<sup>th</sup> February 2026