

Appendix 2: Equality Impact Assessment

Overall Information	Details of Full Equality Impact Analysis
Financial Year	2024/25
Name and details of policy, strategy, function, project, activity, or programme	<p>Private Rented Sector Policy</p> <p><u>Short summary:</u> The Council is seeking to adopt an ambitious Private Rented Sector (PRS) Policy for H&F, which aims to make private rented housing standards in the borough the best in London. The policy sets out how we will work with private renters and landlords to create a more accessible, secure, and high quality PRS for local residents. This work contributes positively towards the ambitions of the H&F Plan 2023-2026 and the Council's wider Housing Strategy, as we seek to deliver more affordable, accessible, safe, and sustainable housing options for our residents. This follows a wide-ranging public consultation that has shaped the policy.</p>
Lead Officer	<p>Name: Clancy Connolly Position: Policy Officer Email: clancy.connolly@lbhf.gov.uk</p>
Date of completion of final EIA	18 November 2024
Section 02	Scoping of Full EIA
Analyse the impact of the policy, strategy, function, project, activity, or programme	<p>Housing is a key component of inequality in the UK, and there are particularly long-standing inequalities with regards to ethnicity, age, sex, sexual orientation, and disability, among other protected groups identified in the Equalities Act 2010. Housing has the potential to both cause, and be a tool to address, inequalities that exist in today's society. This Policy contributes positively to tackling these issues. The Policy explains how we will tackle rental discrimination within the PRS that threatens the ability of some residents to secure accessible, secure, and safe housing. Drawing on the lessons from our Disabled and Older People's Resident Commissions, and our pioneering co-production initiatives, the policy sets out that we will work to drive out systemic discrimination and unfairness within the PRS and help people with additional support needs to ensure that the local PRS works for them. The Policy also seeks to tackle discrimination if faced by landlords in the borough, although this EIA focuses more so on renters, given this is a much larger group.</p>

The rising cost of private renting, growth of the sector, and comparative low quality of this tenure compared to owner and social tenures means there is inequality, as the sector has insufficient regulation, and research shows that some illegal and unethical practices happen.

English Housing Survey [data](#) (2022-23) shows that there is great diversity across the PRS, particularly compared to owner-occupied housing, with migrants from the EU and rest of the world renting in the borough. Statistics show that Black representation in the PRS (and owner occupied / mortgaged properties) is comparatively low, but accounts for a much higher percentage of social renters in the borough.¹

Private renters in particular protected groups can face discrimination when renting, or when seeking to agree a tenancy agreement, from unscrupulous landlords and letting agents. Research shows that private renters disproportionately encounter discrimination and barriers to access PRS homes if they; are Black or of an ethnic minority background; are in receipt of benefits; have children; are a single-parent household; or have pets.²

The financial and socio-economic barriers to renting in the PRS are also disproportionately high. More people in London spend a relatively high amount of their income on their rents (42% of the average Londoner's income) compared to the average 26%-30% seen more broadly nationally. Renters in the PRS will have less disposable income, whilst many residents are financially precluded from renting in the PRS to begin with, which is likely to add to pressures in social housing demand and/or force people to rent elsewhere.

Other socio-economic factors preclude people from the PRS, particularly around the decision-making of landlords. The English Private Landlord [Survey](#) (2021) reveals that private landlords are more likely to let to white collar, professional workers (60%), followed by blue collar / manual workers (39%), whilst the minority will let to people in receipt of Housing Benefit or Local Housing Allowance (~18%), or people in receipt of Universal Credit (~16%), key groups that rely on the PRS. The vast majority of landlords (83%) state that they believe their tenants do not receive any benefits.³

The policy explicitly seeks to target the poorest performing sub-sectors of the PRS market, where iniquity is most likely to exist. Accordingly, this PRS policy speaks directly to an awareness of these inequalities, how we will help to tackle discrimination in the sector and make the sector more accessible and inclusive for everyone through robust enforcement, resident engagement, implementation of national reforms and ensuring the Council continues to support the supply of more affordable homes that meets residents' needs.

¹ English Housing Survey. Jul 2024.

<https://www.gov.uk/government/statistics/english-housing-survey-2022-to-2023-rented-sectors/english-housing-survey-2022-to-2023-rented-sectors>

² Shelter. Dec 2023.

https://england.shelter.org.uk/what_we_do/updates_insights_and_impact/prejudice_in_practice_racism_in_the_private_rented_sector

³ English Private Landlord Survey. Sep 2024.

<https://www.ethnicity-facts-figures.service.gov.uk/work-pay-and-benefits/benefits/state-support/latest/>

This policy, and the equality implications that surround broader housing in the borough, is supported through wider strategic work through the Council’s Housing, Rough Sleeping and Homelessness, older and Disabled residents housing strategies, among others – all of which inform and are informed by our corporate priority in the H&F plan 2023-2026 of promoting fairness, equity and inclusions for all – alongside our organisational value of being a compassionate and inclusive council. A full equalities impact analysis is provided below, but in summary, the Council’s PRS Policy is only expected to have a positive impact on protected groups, with no negative impact expected based on our analysis.

Protected characteristic	Analysis	Impact:
Age	<p>The proposal will have a direct positive impact on people of different ages in the borough. We expect some people of all ages may be negatively impacted by poor housing conditions in different ways, and this Policy seeks to support all residents in that respect.</p> <p>For older residents in ill-health or Disabled residents, the Council offers funding for residents to adapt private rented homes with the support of their landlord. In line with English Housing Survey data, we recognise that the sector houses many younger residents, more so than other tenures (owner occupied, mortgage, or social housing). Supporting residents of all ages in accessing safe and warm housing, with secure tenancy agreements in place, will serve to provide a more solid foundation for residents going forward.</p> <p>This policy recognises that the law will change to end Assured Shorthold tenancies, which will be replaced by periodic / rolling tenancies – and that this will affect student living in the PRS. Under the Renters Rights Bill, purpose-built student accommodation will be exempt from the scope of the bill providing they have signed up to government approved codes of practice. Student off-street properties will be within scope of the Bill and we await clarifications from government on how new tenancy agreements will fall in step with the academic year in order to remain open to new student intakes.</p>	Positive
Disability	<p>Disabled and long-term ill residents are likely to be more impacted by poor PRS housing they may be more susceptible to the impacts of cold homes if they are less mobile. Disabled residents nationally are twice as likely to live in poverty and often need more domestic energy for essential living. Resolution Foundation</p>	Positive

		<p>research highlights that around half of disabled adults are having to cut back on food, have significantly less disposable income or savings than non-disabled people, and will struggle to heat their homes.⁴</p> <p>A separate report by Trust for London showed that disabled and long term sick people were the demographic group most likely to be unable to afford to keep their house warm.⁵</p> <p>Disability groups have called for more accessibility in the PRS, noting that the shortage of social housing has meant that renting privately has become the only option for many Disabled people, with 1 in 5 currently relying on the PRS. Of these PRS renters, 1 in 3 are forced to live in homes which are unsuitable.</p> <p>Disabled residents can also find it harder to secure suitable homes, in part because of discrimination that can exist, and with highly damaging repercussions. Disabled people living in unsuitable accommodation are; less likely to be in work; more likely to experience physical and mental health deterioration; more likely to be admitted to hospital as a result of falls; more likely to rely on social care and are not able to live independently.</p> <p>This Policy actively seeks to drive up home energy efficiency standards (supported by our housing development programme and Fuel Poverty Strategy) and offers to support Disabled residents with home improvements and / or adaptations through Disabled Facilities Grants.</p>	
	Gender reassignment	<p>As of the 2021 Census, 425 people in the borough identified as transgender. Research suggests that some landlords may refuse to let properties to transgender tenants based on their own personal prejudice. H&F offers the facility to register complaints in these situations and the policy commits to challenge discrimination, including for transgender residents – of which the 2021 Census found there were over 330 H&F residents living in the PRS, or rent-free. Discrimination within a housing context can take many forms – from landlords and estate agents refusing to rent to LGBTQ+ people, to harassment and abuse</p>	Positive

⁴ Resolution Foundation. Jan 2023.

<https://www.resolutionfoundation.org/press-releases/44-per-cent-disability-income-gap-makes-people-with-disabilities-more-likely-to-struggle-to-heat-their-homes-and-cut-back-on-food-this-winter/>

⁵ Trust for London. Jul 2022.

https://trustforlondon.fra1.cdn.digitaloceanspaces.com/media/documents/Londons_Poverty_Profile_2022_report_150dpi33_copy_4VN0wdD.pdf

		<p>from neighbours. A 2022 study found that around 1 in 5 LGBTQ+ private renters have experienced discrimination from landlords, with transgender individuals experiencing even higher levels of discrimination and risk of homelessness. ⁶</p> <p>The policy commits to prevent discrimination by raising awareness of what constitutes discrimination – and related rights and obligations among landlords and private renters – through an information campaign and our landlord forum.</p>	
	Marriage and Civil Partnership	The policy supports all residents regardless of their marital status.	Neutral
	Pregnancy and maternity	<p>Around 90% of single parents are women.⁷ The British Psychological Study have warned that the recent rise in everyday living costs, which is fuelled in part by high housing costs, will have a disproportionate impact on women’s mental health, in part because of childcare responsibilities and the associated costs, and the challenges that childbirth can create for re-entering the workplace.</p> <p>In 2023, the Property Ombudsman ruled that blanket bans on letting properties to families with children discriminates against women and are against the sector’s code of practice in England. Around 20% of parents – equating to almost 300,000 families in England – have been unable to rent somewhere they wanted in the last five years because they have children, according to Shelter.</p> <p>The UK has the highest childcare costs in Europe. The high cost of housing is a key issue and challenge for residents, and the high cost of childcare together with gender based average income inequality exacerbates affordability challenges for women.</p> <p>Our survey had over 60% of responses from women and this policy has been developed with their views in mind.</p>	Positive
	Race	In H&F, ‘white’ groups make up 63% of the population, and the majority of private renters (73%), which is slightly above the average across all tenures in	Positive

⁶ Generation Rent. Jun 2022. <https://www.generationrent.org/2022/06/28/i-didnt-feel-safe-being-my-full-self/>

⁷ Gingerbread. Jul 2024. <https://www.gingerbread.org.uk/our-work/single-parents-facts-and-figures/>

		<p>the borough (68%). Asian households make up around 10% of the population in the borough, and are slightly overrepresented in the PRS (12%) compared to the average across all tenures in the borough (10%). Conversely, nearly 14% of the borough 's population is Black residents or residents identifying as being of any other Black background, but these groups are underrepresented in the PRS, making up just 4% of PRS households, compared to 12% in all households (predominantly social rented housing) across the borough.⁸</p> <p>Research shows that Black and Ethnic Minority renters are disproportionately faced with barriers that prevent them from securing a home in the sector, compared to White renters. In particular, Black and Ethnic renters are more likely to encounter prejudicial barriers from landlords or agents if they; have children; are single parent households; and/or are in receipt of benefits. They are also disproportionately more likely to be asked to provide high levels of rent up front and tolerate poorer living arrangements.⁹ We also know that some ethnic groups are overrepresented in overcrowded and poorly insulated homes.</p> <p>The Policy focusses specifically on these poorest performing sectors of the market. The policy is explicit that “We will support local renters so that they have somewhere to turn when they are discriminated against, particularly those who may have additional support needs, and those who are exploited or excluded for being themselves.” This includes those who are discriminated against based on race.</p>	
	Religion/belief (including non-belief)	The policy is explicit that “We will support local renters so that they have somewhere to turn when they are discriminated against, particularly those who may have additional support needs, and those who are exploited or excluded for being themselves.” This includes those who are discriminated against based on religion or belief.	Positive
	Sex	English Housing Survey data finds that around 60% of private renters are male, whilst a similar percentage of social renters are women. As this document has highlighted, it is also highly likely that single parents, 90% of whom are female, will encounter discrimination and exclusion to renting in the PRS.	Positive

⁸ Census 2021 data for H&F.

⁹ Shelter (December 2023). Racism in the private rented sector.

https://england.shelter.org.uk/what_we_do/updates_insights_and_impact/prejudice_in_practice_racism_in_the_private_rented_sector

	Our survey had over 60% of responses from women and this policy has been developed accordingly. The policy supports all residents regardless of sex, and is committed to tackling discrimination in this respect.	
Sexual Orientation	The policy supports all residents, regardless of their sexual orientation. We know that LGBTQ+ people are disproportionately likely to face disadvantage in seeking appropriate housing, which in turn can impact their wellbeing. The policy is explicit that “We will support local renters so that they have somewhere to turn when they are discriminated against, particularly those who may have additional support needs, and those who are exploited or excluded for being themselves.” This includes those who are discriminated against based on religion or sexual orientation.	Positive
Care leavers	<p>The policy supports all residents including care leavers and is committed to tackling any discrimination this group faces in accessing PRS homes as part of living independently.</p> <p>In June 2023, Cabinet agreed that 'care experienced' be recognised as a protected characteristic in H&F. By agreeing to include care experience as a protective characteristic, H&F pledges to support those residents into housing, until the age of 25. We are committed that future services and policies made and adopted by the council will be assessed through equality impact assessments to determine the impact of changes on people with care experience.</p> <p>H&F commits, through our housing charter for care experienced young people, to work with suitable private landlords to support care experienced renters in accessing suitable and affordable PRS tenancies, pledging to provide the deposit and first month's rent, and act as a guarantor where necessary.</p> <p>Our charter also pledges to support renters to understand their rights and landlord responsibilities, whilst dealing with complaints promptly and fairly – escalating any issues where appropriate.</p>	Neutral

Human Rights or Children’s Rights

Will it affect Human Rights, as defined by the Human Rights Act 1998? No

Will it affect Children’s Rights, as defined by the UNCRC (1992)? No

Section 03	Analysis of relevant data Examples of data can range from census data to customer satisfaction surveys. Data should involve specialist data and information and where possible, be disaggregated by different equality strands.
Documents and data reviewed	<p>Key data sets and reported figures considered are:</p> <ul style="list-style-type: none"> • Census 2021, Office for National Statistics. • Gulliver, K. (2017). Racial discrimination in UK housing has a long history and deep roots. • Grant, S., Peel, CH. (2015). “No Passport Equals No Home”: An independent evaluation of the ‘Right to Rent’ scheme. • Single parents: facts and figures, Gingerbread https://www.gingerbread.org.uk/ • UK inflation rate is substantially higher for women’, New Statesman, August 2022. https://www.newstatesman.com/business/economics/2022/08/uk-inflation-rate-higher-for-women • Back on target, <i>Resolution Foundation</i>, May 2022, https://www.resolutionfoundation.org/publications/back-on-target/ • Falling faster amidst a cost-of-living crisis: Poverty, Inequality and Ethnicity in the UK’, <i>Runnymede Trust</i>, October 2022. 633d8007a3bfa49bd4cd0fa8 Runnymede Briefing Cost of Living FINAL.pdf • From Disability to Destitution’, <i>Joseph Rowntree Foundation</i>, July 2022. https://www.jrf.org.uk/deep-poverty-and-destitution/from-disability-to-destitution • English Housing Survey, 2021-22. English Housing Survey 2021 to 2022: private rented sector - GOV.UK • English Housing Survey, 2022-23. English Housing Survey 2022 to 2023: rented sectors - GOV.UK • English Private Landlord Survey, 2021. English Private Landlord Survey 2021: main report - GOV.UK • Family Resources Survey, 2022. State support - GOV.UK Ethnicity facts and figures • H&F Housing charter for care experienced young people. Housing charter for care experienced young people London Borough of Hammersmith & Fulham • Disability Rights UK. Disability Groups Call for More Accessible Housing for Private Renters, 2024. Disability Groups Call for More Accessible Housing for Private Renters Disability Rights UK • ‘I don’t feel safe being my full self’, Generation Rent, 2022. "I didn’t feel safe being my full self" - Generation Rent
Section 04	Consultation
Consultation	A separate consultation summary has been developed

Analysis of consultation outcomes	In our survey, there were approximately twice as many men who were landlords compared to women. Conversely, there were twice as many women who identified as private renters. Whilst the sample size was not statistically significant, it raises the importance of having a gender balance in future engagement activities, such as through the landlords forum proposed in the policy.
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Section 05	Action Plan			
Action Plan	Note: You will only need to use this section if you have identified actions as a result of your analysis			
	Action to be taken	When	Lead officer and department	Expected outcome
	To monitor on an ongoing basis which protected groups are accessing funding, to ensure they are fairly represented in the support we offer.	Over the course of the policy's delivery	Assistant Director, Housing Standards	Better and more equal representation of the views of residents and landlords.

Section 08	Agreement, publication and monitoring			
Senior Managers' sign-off	Name: Matthew Sales Position: Assistant Director Email: matthew.sales@lbhf.gov.uk Telephone No: 07776 672963			
Key Decision Report (if relevant)	Date of report to Cabinet Member: 20 November 2024 Key equalities issues have been included: Yes			