

Form name	Integrated Impact Assessment
Reference	IA541110370
Date	22/08/2023



Policy details

Request date	22/08/2023 11:23
Directorate	PCC Housing, Neighbourhood and Building Services
Service	Private Sector Housing, Mandatory Licensing of Houses in Multiple Occupation (HMO)
Title of policy, service, function	Mandatory HMO Licensing
Type of policy, service, function	Existing
What is the aim of your policy, service, function, project or strategy?	The aim of HMO licensing is to ensure that HMOs are safe and well managed for the safety of the tenants.
Has any consultation been undertaken for this proposal?	yes
What were the outcomes of the consultations?	A consultation was undertaken from May to August 2022 regarding HMO licensing, with a focus on the potential introduction of additional licensing of HMOs in the city, along with a review of the Private Sector Housing HMO space & amenity standards, and licence conditions. The results showed that the respondents to the consultation were overall in support of introducing an additional licensing scheme in the city. Respondents provided views on a number of aspects of the proposed scheme which have been taken into account. A further consultation has now been undertaken specifically with existing Mandatory HMO Licence holders on the proposal to align the mandatory & additional licensing scheme. 22% of all current licence holders participated in the survey, of these 73% of respondents stated that they agreed with the proposals to align the two schemes.
Has anything changed because of the consultation?	yes

Please provide details	The cabinet agreed in November 2022 to introduce a city wide designation of Additional Licensing in the city, this included a new approach to licensing whereby licences will be issued for different terms based on the compliance of the landlord or agent. The consultation led to changes being made to the proposed licensing model, fee structure, and related policies. One aspect of feedback was that landlords felt it was unfair that they should be subject to the same scheme and have to pay the same fee as those landlords who are not compliant. 73% of respondents to the latest consultation conducted with current Mandatory HMO licence holders stating that they agreed with these proposals, of those that disagreed, there were comments made which indicated that several of these respondents may have not read the information provided regarding the new proposals, for example stating that they would like to see the criteria for the different licence terms, or that they feared it may be too subjective.
Did this inform your proposal?	yes
Please provide details	The fee structure and criteria for licensing are designed to reflect that landlords who are compliant require less officer time and therefore will pay a lower licensing fee than those who raise concern about their compliance, who will pay more as officers will spend more time monitoring their compliance.

Equality & diversity - will it have any positive/negative impacts on the protected characteristics?

<p>With the above in mind and following data analysis, who is the policy, service, function, project or strategy going to benefit or have a detrimental effect on and how?</p>	<p>The scheme will positively impact those living in Houses in Multiple Occupation (HMOs). Evidence suggests that HMOs have a disproportionately high level of safety issues and/or poor management compared to other properties in the Private Rental Sector. Lowest income groups - Due to Local Housing Allowance rates, shared housing is often the only source of accommodation available for people on benefits and low income. It is important that such properties are improved proactively as previous consultations with HMO tenants have indicated that those living in HMOs due to affordability often do not feel able to complain about the conditions they live in for fear of eviction. Those on low incomes living in poor quality HMOs in the city will be positively impacted by improved living conditions through this scheme. Those on the lowest incomes who feel unable to move from poor living conditions because they cannot afford better accommodation will particularly benefit from the licensing scheme, as those who can afford to move from a property they are unhappy with already have the option to improve their living environment. Age - there is a significant population of students/young adults whose only source of affordable housing in the city is the shared house in multiple occupation. There is also data to suggest that people are relying on HMOs for accommodation later in life, with the occupants of HMOs steadily increasing to older age groups, who often feel they have no alternative options or prospective of moving out of the sector. It is important to ensure that good quality safe accommodation is provided for the benefit of all HMO occupants.</p>
<p>Will any of those groups be affected in a different way to others because of your policy, project, service, function, or strategy?</p>	<p>Those on low incomes living in poor quality HMOs in the city will be positively impacted by improved living conditions through this scheme. Those on the lowest incomes who feel unable to move away from poor living conditions because they cannot afford better accommodation will particularly benefit from the licensing scheme, as those who can afford to move from a property they are unhappy with already have the option to improve their living environment.</p>
<p>If you are directly or indirectly discriminating, how are you going to mitigate the negative impact?</p>	<p>It is not envisaged that this scheme is discriminating against a protected group/ characteristics</p>

<p>Who have you consulted with or are planning to consult with and what was/will be your consultation methodology?</p>	<p>a 10 week statutory consultation exercises from May to August 2022 sought views via</p> <ul style="list-style-type: none"> • Online questionnaire tailored to gauge a cross section of views. It was open for anyone to engage with, but was particularly targeted to tenants of HMOs, local residents living near to HMOs, and landlords and agents of HMOs, as well as to local businesses. It was promoted through ward and communities groups ; • Online focus groups with key stakeholder groups such as the universities and student bodies; • Other key organisations such as Hampshire Fire and Rescue Service, Police, University etc. • Drop in sessions in various parts of the City; • E-communications through social media and the Council`s website • Local Landlord association • Flagship articles in the Councils city-wide magazine • Leaflets and door knocking in areas of the city with high concentrations of HMOs <p>This consultation had a focus on the potential introduction of additional licensing in the city, rather than amending the current mandatory licensing scheme. However, several of the policies consulted upon impact both mandatory and additional licensing, and all landlords and agents were invited to participate in the consultation, including those who are mandatory licence holders.</p> <p>A further consultation was conducted with mandatory licence holders regarding the proposal to align the mandatory licensing scheme to the same criteria proposed for additional licensing. All current licence holders were contacted via email or post to invite them to participate in the survey, with 22% of licence holders participating in the survey. 73% of those that responded stated they agreed with the proposals.</p>
<p>How are you going to review the policy, service, project or strategy, how often and who will be responsible?</p>	<p>The licensing scheme, and in particular the licensing fees, will be reviewed regularly. The report includes an annual review of the licence fees, but the performance of the scheme will be reviewed alongside the reviews of additional licensing during the 5 year designation period of additional licensing.</p>

Crime - Will it make our city safer?

<p>Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?</p>	<p>Entry by Intruders is one of the 29 HHSRS which is considered by officers as part of the HMO inspection programme. Every licensed property will be inspected at least once during its licence term. The licence fee is designed to cover the cost of Council resources in carrying out these inspections</p>
<p>How are you going to measure/check the impact of your proposal?</p>	<p>A record of all hazards found during inspections will be reviewed, and that these are being monitored for compliance through the scheme.</p>

Housing - will it provide good quality homes?

<p>Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?</p>	<p>Evidence suggests that approximately 1 in 3 HMOs in the city may have one or more serious hazards, making them unsafe for the occupants or visitors of the properties. The licensing scheme is aimed at proactively inspecting these properties, identifying the safety issues, and ensuring that the licence holder rectifies these in a timely manner.</p>
<p>How are you going to measure/check the impact of your proposal?</p>	<p>Measures of the performance of the service, including the disrepair/safety issues identified and rectified will be measured and reviewed</p>

Health - will this help promote healthy, safe and independent living?

<p>Please expand on the impact your policy/proposal will have, and how you propose to mitigate any negative impacts?</p>	<p>There is significant body of evidence (Marmot Review) which demonstrates that there is a strong link between a residents health and poor housing, By raising the standard of housing in HMOs it is expected to have a positive impact on the health of HMO occupants.</p>
<p>How are you going to measure/check the impact of your proposal?</p>	<p>Measures of the performance of the service, including the disrepair/safety issues identified and rectified will be monitored and reviewed. The specific health outcomes for the occupants will not be possible to measure, but national research and data can be used to extrapolate the impact of this work.</p>

Income deprivation and poverty - will it consider income deprivation and reduce poverty?

This section is not applicable to my policy	<input checked="" type="checkbox"/>
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Carbon emissions - will it reduce carbon emissions?

This section is not applicable to my policy	<input checked="" type="checkbox"/>
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Energy use - will it reduce energy use?

This section is not applicable to my policy	<input checked="" type="checkbox"/>
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Climate change mitigation and flooding - will it proactively mitigate against a changing climate and flooding?

This section is not applicable to my policy	<input checked="" type="checkbox"/>
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Natural environment - will it ensure public spaces are greener, more sustainable and well-maintained?

This section is not applicable to my policy	<input checked="" type="checkbox"/>
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Air quality - will it improve air quality?

This section is not applicable to my policy	<input checked="" type="checkbox"/>
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Transport - will it make transport more sustainable and safer for the whole community?

This section is not applicable to my policy	<input checked="" type="checkbox"/>
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Waste management - will it increase recycling and reduce the production of waste?

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