

EQUALITY IMPACT ASSESSMENT

Community Connections



STAGE I: WHAT IS BEING ASSESSED AND BY WHOM?

<p>What is being assessed - including a brief description of aims and objectives?</p>	<p>This EIA applies to the new policy, guidance and procedure for making applications for Banning Orders. Banning Orders are a statutory power available to local authorities for tackling the most serious and prolific Rogue Landlords and Property Agents. This power was introduced as one of a range of additional enforcement measures, available to local authorities, by the Housing and Planning Act 2016 (Part 2, Chapter 2). For a local authority to be able to utilise this power, it must have a policy in place.</p> <p>A Banning Order, if granted, would prevent the subject (for a minimum of 12 months – no maximum period) from;</p> <ul style="list-style-type: none"> Letting housing in England Engaging in English letting agency work Engaging in English property management work; or Doing two or more of those things <p>Additionally;</p> <ul style="list-style-type: none"> A landlord subject to a banning order is also unable to hold a licence for a House in Multiple Occupation (HMO) and their property may also be subject to a management order A landlord is prevented from transferring the property to certain persons whilst the banning order is in force. <p>Plymouth City Council keeps housing conditions in its Private Rented Sector under review through the utilisation of the Housing Improvement Team, and HMO Licensing Team, offers as part of the Community Connections service.</p> <p>Prior to this policy, there was no specific policy in relation to the Banning Orders process. Plymouth City Council have reviewed national government guidance and other Banning Order policies in existence at other LA's. Having this policy in place positively contributes towards Pledge 81.</p>
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<p>Department and service</p>	<p>People - Community Connections – Housing Improvement Team</p>
<p>Date of assessment</p>	<p>10th January 2022</p>

STAGE 2: EVIDENCE AND IMPACT

Protected characteristics (Equality Act)	Evidence and information (eg data and feedback)	Any adverse impact See guidance on how to make judgement	Actions	Timescale and who is responsible
Age	<p>Rising house prices, a shortage of properties and changes to Housing Benefit are making it hard for young people to get on to the housing ladder or achieve independence. This means they are now more likely to live with parents or remain in the private rented sector.</p> <p>The average age in Plymouth (39.0 years) is about the same as the rest of England (39.3 years), but less than the South West (41.6yrs).</p>	<p>Whilst the impact is differential because there are more young people entering the private sector. Our assessment is the impact isn't negative and therefore there is no negative impact.</p>	<p>None required.</p>	<p>N/A</p>
Disability	<p>Although the gap in non-decent accommodation has closed over recent years, one in three households with a disabled person still live in non-decent accommodation.</p> <p>A total of 31,164 people (from 28.5 per cent of households) declared themselves as having a long-term health problem or disability (national figure 25.7 per cent of households), compared with the total</p>	<p>Whilst non-decent accommodation could have a greater impact upon persons with disabilities the policy is aimed at redressing poor standards, by preventing the most serious and prolific Rogue Landlords and Property Agents from operating in the private sector. Therefore the overall impact is positive.</p> <p>Frontline access to the service is online, through face to face at the Council's first stop shop and by telephone.</p>	<p>PCC is developing an online package of disability awareness training.</p> <p>We will liaise with the sub group to see any recommendations to implement.</p>	<p>Operational Manager to ensure staff are signposted to the training as required.</p> <p>Review -12 months.</p>

	<p>number of people with disabilities in UK (11,600,000).</p> <p>Some staff are not equipped to deal confidently with requests from disabled customers for reasonable adjustments to enable them to access Council services.</p> <p>With regard to computer access, we need to address people's literacy levels first and ensure that they have the knowledge to keep up with changes in technology.</p> <p>We have asked the Learning Disability Board to set up a sub-group to address housing issues in Plymouth, especially for people coming back to the county from long term mental health placements.</p>	<p>Whilst we feel that staff involved in making decisions in relation to the policy are generally adequately equipped to consider the needs of disabled clients we will need to ensure new members of staff receive appropriate training and existing staff have refresher training as appropriate.</p> <p>It is possible there may be learning from the Learning Disability Board sub group.</p>		
<p>Faith/religion or belief</p>	<p>84,326 (32.9 per cent) of the Plymouth population stated they had no religion.</p> <p>Those with a Hindu, Buddhist, Jewish or Sikh religion combined totalled less than 1 per cent.</p>	<p>No impact anticipated.</p>	<p>N/A</p>	<p>N/A</p>

	<p>Christianity: 148,917 people (58.1 per cent), decreased from 73.6 per cent since 2001.</p> <p>Islam: 2,078 people (0.8 per cent), doubled from 0.4 per cent since 2001.</p>			
Gender - including marriage, pregnancy and maternity	<p>Overall 50.6 per cent of our population are women and 49.4 per cent are men: this reflects the national figure of 50.8 per cent women and 49.2 per cent men.</p> <p>There were 3280 births in 2011. Birth-rate trends have been on the increase since 2001, but since 2010 the number of births has stabilised. Areas with highest numbers of births include Stonehouse (142), Whitleigh (137) and Devonport (137).</p> <p>Of those aged 16 and over, 90,765 people (42.9 per cent) are married. 5,190 (2.5 per cent) are separated and still legally married or legally in a same-sex civil partnership.</p>	No impact anticipated.	N/A	N/A
Gender reassignment	Recent surveys have put the prevalence of transgender people between 0.6 and 1% of population (some very recent reports have upped this to 2%).	No impact anticipated.	N/A	N/A

	<p>Over the last 8 years the prevalence of transgendered people in the UK has been increasing at an average rate of 20%+ per annum in adults and 50% for children.</p>			
<p>Race</p>	<p>Our community is slowly becoming more diverse. Whilst the proportion of our community that are White British remains higher than the UK average it is decreasing. At the time of the 2001 census 97 per cent of our population was White British. By 2011 this had decreased to 93 per cent.</p> <p>Local population growth between the 2001 and 2011 census had been driven by migration from outside the UK (63 per cent), most commonly from newly admitted EU countries. We are a dispersal area for asylum seekers: around 300 people will be accommodated in the City at any given time.</p> <p>Our Black and Minority Ethnic (BAME) communities are very diverse. The Polish, Chinese and Kurdish communities are amongst the largest. The census records that there are at least</p>	<p>There will be disproportionate numbers of BAME tenants in the private rented sector. Our policy is designed to improve the standards within private rented accommodation and the general impact would therefore be positive, in particular:</p> <p>We are aware of issues around rogue landlords e.g. operating a blanket policy of refusing tenancies for BAME groups because they don't wish to be burdened with the right to rent checks as required by Home Office.</p> <p>We have had a significant number of complaints from asylum seekers about Home Office contracted accommodation provider.</p> <p>Some BAME communities may require advice and support in languages other than English.</p>	<p>There are legal mechanisms for enforcing against rogue landlords including those that discriminate against ethnic minority communities.</p> <p>We have an ongoing dialogue with the provider. Where complaints have been escalated we have raised these at strategic level with the Home Office.</p>	<p>This will be addressed in the Rogue Landlord Policy which will sit alongside this policy. It will be reviewed within the next 12 months.</p>

	<p>43 main languages spoken in the city, and nearly 100 different languages are spoken in our schools. We have a small resident Gypsy and Traveller community.</p> <p>Across the country 18 per cent of households are social rented (17 per cent Private Rented). When comparing White British households with all other ethnic groups* they were less likely to rent social housing. The households that are most likely to rent social housing were headed by someone in the African, Caribbean, Other Black, Bangladeshi, Irish and Arab groups, or the Mixed groups other than Mixed White and Asian. As a group, ethnic minority households are also much more likely to rent privately than White British households and to spend a higher proportion of their incomes on rent, regardless of whether they rent from a social or private landlord.</p> <p>In Plymouth 19 per cent of households are Social Rented, (20 per cent are Private rented). More detailed work is needed to extrapolate data</p>			
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	<p>which is help by Social landlords.</p> <p>92.9 per cent of Plymouth’s population identify themselves as White British.</p> <p>7.1 per cent identify themselves as Black and Minority Ethnic (BAME) with White Other (2.7 per cent), Chinese (0.5 per cent) and Other Asian (0.5 per cent) the most common ethnic groups.</p> <p>Our recorded BAME population rose from 3 per cent in 2001 to 6.7 per cent in 2011, and therefore has more than doubled since the 2001 census.</p>			
<p>Sexual orientation - including civil partnership</p>	<p>The key findings from a recently published report by Stonewall “LGBT in Britain - Hate Crime and Discrimination”, (Sept 2017) are set out below. NOTE: data based on YouGov polling of more than 5000 LGBT people in Britain - data includes ‘transgender’);</p> <p>One in 10 LGBT people (10 per cent) who were looking for a house or flat to rent or buy in</p>	<p>We are aware of issues around rogue landlords discriminating against members of the LGBT community.</p>	<p>There are legal mechanisms for enforcing against rogue landlords including those that discriminate against LGBT communities.</p>	<p>This will be addressed in the Rogue Landlord Policy which will sit alongside this policy. It will be reviewed within the next 12 months.</p>

	the last year were discriminated against because of their sexual orientation and/or gender identity.			
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STAGE 3: ARE THERE ANY IMPLICATIONS FOR THE FOLLOWING? IF SO, PLEASE RECORD ACTIONS TO BE TAKEN

Local priorities	Implications	Timescale and who is responsible
Reduce the gap in average hourly pay between men and women.	N/A – no staffing implications in this policy.	N/A
Increase the number of hate crime incidents reported and maintain good satisfaction rates in dealing with racist, disablist, homophobic, transphobic and faith, religion and belief incidents.	Whilst it won't be likely as a result of this policy this may be an outcome from the proposed Rogue Landlord Policy.	N/A
Good relations between different communities (community cohesion)	Maintaining high standards in the private rented sector is important in maintaining good relations between tenants from differing backgrounds and the wider community.	N/A
Human rights Please refer to guidance	The policy supports Protocol 1, Article 1 - peaceful enjoyment of your property.	N/A

STAGE 4: PUBLICATION

Responsible Officer 

Date

12 January 2022

Director, Assistant Director or Head of Service