



HILLINGDON  
LONDON

## Appendix 4 - Equality and Human Rights Impact Assessment (“EIA”)

### A) Description of what is to be assessed and its relevance to equality

What is being assessed? Please tick ✓

Review of a service  Staff restructure  Decommissioning a service

Changing a policy ✓ Tendering for a new service  A strategy or plan ✓

Proposal to introduce discretionary property licensing in Hillingdon under the Housing Act 2004.

Who is accountable? E.g. Head of Service or Corporate Director

Dan Kennedy, Corporate Director of Residents Services  
Richard Webb, Director of Community Safety & Enforcement

Date assessment completed and approved by accountable person

Completed – 27 January 2026

Names and job title(s) of person / people carrying out the assessment

Michelle Greenidge, Private Sector Housing Manager  
Stephanie Waterford, Head of Public Protection & Enforcement

A.1) What are the main aims and intended benefits of what you are assessing?

This EIA was carried out after a 10-week consultation, commencing 31 October 2025 on proposals to introduce additional licensing for Houses of Multiple Occupation (HMO's) in Hillingdon under the Housing Act 2004.

If introduced the effect will be that landlords who rent or let smaller HMO's of 4 or less people in Hillingdon must have a licence.

The council recognises that much of the private rented sector in Hillingdon offers good accommodation to people who want to live in the borough, but also that in parts of the borough, HMO properties are badly managed, in poor condition, and in some cases, unsafe. The proposal to introduce additional licensing is intended to improve the conditions of HMO's in the private rented sector (PRS) and housing management standards.

The benefits of additional licensing are to:

- Provide an improved strategic approach to managing the sector
- Help to identify all properties that are rented out privately
- Establish a register of landlords operating in Hillingdon and ensure that they are "fit and proper" persons to manage rented properties
- Give the council the opportunity to inspect the properties to assess living conditions and to advise landlords, managing agents and tenants about their obligations
- Impose the local licensing conditions as a minimum letting standard in Hillingdon
- Redefine how the service operates by shifting the emphasis from a customer complaint- led, reactive service
- Reduce the levels of waste and anti-social behaviour in the borough and act against those whose properties or tenants cause persistent ASB
- Apply enforcement action to tackle those rogue landlords in the sector

Applications for the licence must be made to the Council and shall be accompanied by a licence fee. Licensing conditions will be applied to licences and compliance requirements will be enforced by the council.

Overall, if licensing is introduced, it will help the council to work with landlords, tenants and businesses, and with internal and external partners to drive up standards.

It is expected that the proposals will help to create a fairer private rented sector in Hillingdon.

A.2) Who are the service users or staff affected by what you are assessing? What is their equality profile?

The following outlines the data available for tenants and landlords as a whole, who may be affected by the proposals.

### **Tenants**

#### **Age**

Office for National Statistic Census data 2021 reported that younger households are more likely to rent privately than older households.

The average (median) age of Hillingdon increased by one year, from 35 to 36 years of age. The number of people aged 50 to 64 years rose by around 10,000 (an increase of 23.4%).

This area had a slightly higher average (median) age than London as a whole in 2021 (35 years) but a lower average (median) age than England (40 years).

A report by Shelter (2020) found that young renters disproportionately encounter the most and/ or the worst problems whilst renting in the PRS.

### **Disability**

We do not hold any local data of those with this protected characteristic living in or letting properties in the PRS in Hillingdon.

A report by Shelter (2020) found that in the private rented sector, disabled households are almost three times as likely to rely on Housing Benefit and thus be excluded by a No DSS policy than non-disabled households.

Census 2021 showed that 12.6% of residents stated they were disabled under the Equality Act.

### **Race/Ethnicity**

Hillingdon is an increasingly diverse borough. In 2021, 48.2% of people in Hillingdon identified their ethnic group within the "White" category (compared with 60.6% in 2011). 33.3% identified their ethnic group within the "Asian" category (compared with 25.3% the previous decade). 7.8% identified their ethnic group within the "Black" category (compared with 7.3% the previous decade), with 6.3% identifying as "Other" (compared to 3% in 2011).

A report by Shelter (2020) found that residents from Black, Asian and Minority Ethnic backgrounds are disproportionately likely to face significant challenges in the PRS.

The Housing and Migration Network found that 75% of recent migrants were reliant on the Private Rented Sector for their accommodation needs. Rogue Landlords and Agents target recent migrants as tenants due to their lack of understanding of their tenancy rights and need for low-cost housing. Data shows that Hillingdon had the 2<sup>nd</sup> highest net migration figure across London in the last two years.

A proportion of HMOs is likely to be occupied by refugees and new arrivals to the country.

### **Sex**

There is no local data for those living in or letting properties in the PRS in Hillingdon.

A report by Shelter (2020) found that women are among the groups most adversely affected in the UK rental market and are disproportionately more likely to face difficulties when renting privately. Women are 1.5 times more likely than men to receive Housing Benefit.

Additionally, 27% of women reported finding it “very difficult” to secure a decent, affordable home the last time they moved, compared to 19% of men.

### **Sexual orientation**

We do not hold any local data of those with this protected characteristic living in or letting properties in the PRS in Hillingdon however the report by the housing charity Shelter (2020) found that discrimination is widespread in the private rented sector including for people who share this characteristic.

Census 2021 showed that of the 63,080 residents (aged 16+) living in private rented accommodation (or living rent free) 3.6% identified as gay or lesbian, bisexual or any other sexual orientation.

### **Gender reassignment**

We do not hold any local data of those with this protected characteristic living in or letting properties in the PRS in Hillingdon however the report by the housing charity Shelter (2020) found that discrimination is widespread in the private rented sector including for people who share this characteristic.

Census 2021 showed that of the 63,080 residents (aged 16+) living in private rented accommodation (or living rent free) 1.7% identified as trans woman, trans man, any other gender identities or their gender differed from the sex registered at birth.

### **Religion/Belief**

We do not hold any local data of those with this protected characteristic living in or letting properties in the PRS in Hillingdon however the report by the housing charity Shelter (2020) found that discrimination is widespread in the private rented sector including for people who share this characteristic.

Census 2021 showed that 39% of residents identified as Christian, 14.5% as Muslim, 10.9% as Hindu, 8.7% as Sikh, 0.5% as Jewish and 1.7% as other religion; 19.3% identified as having no religion and a further 5.4% did not answer.

### **Landlords**

The English Private Landlord Survey 2024: main report Published 5 December 2024 shows that:

#### **Age, ethnicity and gender of landlords**

The median age of individual landlords was 59 years old. Almost two thirds (64%) of landlords were aged 55 or older, a similar proportion to the 2021 survey (63%). Landlords with larger portfolios tended to be older. Over three-quarters (77%) of landlords with five or more properties were aged 55 or older, compared with 57% of single-property landlords.

In terms of ethnicity, 87% of individual landlords identified as white, 8% Asian, 2% mixed, 2% black and the remaining 1% as other. This is similar to landlords in 2021.

In the 2021 Census statistics for England, a smaller proportion of the population identified as white (81%). The remaining population identified as Asian or Asian British (10%), 4% as black, black British, black Welsh, Caribbean or African, 3% mixed or multiple ethnic groups, and 2% other.

Half (50%) of individual landlords were female, 49% were male and 1% identified as 'other'. The proportion of female landlords has increased since 2021 when 44% said they were female. Male landlords were more likely to have larger portfolios, with 63% of landlords with five or more properties being male.

### **Borough statistics**

Primarily, this proposal has the potential to impact on all residents who live in the borough, including –

- Tenants living in private rented HMO accommodation,
- Landlords and letting agents whose properties will be subject to this scheme,
- Residents and Businesses living in the vicinity of private rented accommodation especially those who are affected by poorly managed HMO property,
- Other council teams and partner agencies providing a service or involved in the regulation of HMOs.

The data shows that there is a total of 113,124 residential properties within the London Borough of Hillingdon.

Of this number, 29,099 properties, are within the private rented sector (PRS).

This number is distributed across all 21 wards and the number of PRS per ward ranges from 283 – 2,231 with the highest number of PRS properties in Uxbridge (2,231), and Heathrow Villages (2,197). The lowest are in Harefield Village (283).

Hillingdon saw London's joint second largest percentage point rise in the proportion of privately rented homes from 19.1% in 2011 to 25.9 in 2021. This is consistent with long term nationwide and regional trends.

The private rented sector is becoming a long-term housing solution for many of our most deprived and vulnerable residents. Alongside this growth, we have seen an acute rise in insecure short-term tenancies, poor property conditions and persistent anti-social behaviour (ASB) in the PRS.

Hillingdon is an increasingly diverse borough.

In 2021, 60.6% of people in Hillingdon identified their ethnic group within the "White" category (compared with 48.2% in 2011). 33.3% identified their ethnic group within the "Asian" category (compared with 25.3% the previous decade). 7.8% identified their ethnic group within the "Black" category (compared with 7.3% the previous decade).

The PRS is utilised by all of the protected groups and therefore all will be affected by this proposal. We do not hold specific data on the PRS population based on their

protected characteristics in Hillingdon but can use national data and trends to allow us to compare.

### A.3) Who are the stakeholders in this assessment and what is their interest in it?

<b>Stakeholders</b>	<b>Interest</b>
Landlords	<ul style="list-style-type: none"> <li>• To ensure that the proposed additional licence arrangements and enforcement actions are implemented in a fair and transparent way</li> <li>• To ensure that the proposed arrangements, landlord responsibilities, and enforcement actions are communicated in a clear and accessible manner</li> <li>• That the cost of the licence is fair and proportionate</li> </ul>
Tenants/Renters	<ul style="list-style-type: none"> <li>• To provide safer and improved conditions in the private rented sector (PRS)</li> <li>• To ensure that responsibilities under the new licence arrangements are clearly communicated</li> </ul>
Local residents	<ul style="list-style-type: none"> <li>• To maintain a clean and safe environment by reducing the levels of waste and anti-social behaviour in the borough and act against those whose properties or tenants cause persistent ASB</li> </ul>
Local businesses	<ul style="list-style-type: none"> <li>• To maintain a clean and safe environment by reducing the levels of waste and anti-social behaviour in the borough and act against those whose properties or tenants cause persistent ASB</li> </ul>
Head of Service and Director of Community Safety & Enforcement	<ul style="list-style-type: none"> <li>• To ensure that the proposed additional licence arrangements are implemented in a fair and transparent way</li> <li>• To ensure that the proposed arrangements, associated responsibilities, and enforcement actions are communicated in a clear and accessible manner</li> <li>• To provide safer and improved conditions in the private rented sector (PRS)</li> <li>• To maintain a clean and safe environment by</li> </ul>

	<p>reducing the levels of waste and anti-social behaviour in the borough and act against those whose properties or tenants cause persistent ASB</p> <ul style="list-style-type: none"> <li>• To provide value for money in service delivery</li> </ul>
Corporate Director Residents Services	<ul style="list-style-type: none"> <li>• To ensure that the proposed additional licence arrangements are implemented in a fair and transparent way</li> <li>• To ensure that the proposed arrangements, associated responsibilities, and enforcement actions are communicated in a clear and accessible manner</li> <li>• To provide safer and improved conditions in the private rented sector (PRS)</li> <li>• To maintain a clean and safe environment by reducing the levels of waste and anti-social behaviour in the borough and act against those whose properties or tenants cause persistent ASB</li> <li>• To provide value for money in service delivery</li> </ul>
Leader of the Council and Council Cabinet	<ul style="list-style-type: none"> <li>• To ensure that the proposed additional licence arrangements are implemented in a fair and transparent way</li> <li>• To ensure that the proposed arrangements, associated responsibilities, and enforcement actions are communicated in a clear and accessible manner</li> <li>• To provide safer and improved conditions in the private rented sector (PRS)</li> <li>• To maintain a clean and safe environment by reducing the levels of waste and anti-social behaviour in the borough and act against those whose properties or tenants cause persistent ASB</li> <li>• To provide value for money in service delivery</li> </ul>

A.4) Which protected characteristics or community issues are relevant to the assessment? Tick in the box ✓

Age	✓	Sex	✓
Disability	✓	Sexual Orientation	✓
Gender reassignment	✓	Carers	
Marriage or civil partnership		Community Cohesion	✓

Pregnancy or maternity		Community Safety	✓
Race / Ethnicity	✓	Human Rights	✓
Religion or belief	✓		

## **B) Consideration of information; data, research, consultation, engagement**

### B.1) Consideration of information and data

A recent report by the housing charity Shelter (2020) found that discrimination is widespread in the private rented sector. The report found that in the 12 months up to September 2019, over 180,000 renters have said that they face discrimination in the sector due to their race, nationality, age, gender, sexual orientation and/ or disability.

The social groups that disproportionately encounter the most and/ or the worst problems are:

- people on the lowest household incomes
- people claiming Housing Benefit
- people from a Black, Asian and other ethnic backgrounds
- young renters
- women
- Members of the LGBTQ+ community
- Disabled renters
- people who are not working, but not retired (students, unemployed and other working age people who are not employed, such as unpaid carers) and people with children in the household.

Marginalised social groups are more likely to struggle in accessing decent, secure, and affordable accommodation within the private rented sector.

This potential discrimination is causing huge stress and anxiety, and forces people to remain in unsuitable and unsafe accommodation because they can't move.

It can also increase the fear of eviction because of the difficulty in finding another home.

Licensing legal requirements and conditions will provide greater protections for these tenants by reducing the fear of retaliatory 'no fault' evictions and helping to remove landlords with a record of discriminatory practices.

The assessment for landlords to be "fit and proper" people will identify any landlords with convictions for hate crimes, discrimination, harassment and will exclude them

from being able to manage properties. This will have a positive impact in reducing landlords with a record of discriminatory practices.

It is anticipated that there will be an overall positive equalities impact on all protected groups through this scheme due to improvements in the standards of housing locally. Housing and mental health are closely linked, therefore, the anticipated improvements to property conditions are highly likely to have a positive impact on the mental wellbeing of the Borough's most deprived and vulnerable tenants.

We do not believe that this proposal will result in any direct/indirect discrimination for any group with protected characteristics. As previously stated, the aim of the proposal is to drive up standards for all privately rented properties within our proposed designation area and licensing will be a legal requirement for any landlord/letting agent letting property in the area. By virtue of the scheme operating within all wards of the Borough additional licensing will help to bridge inequalities faced across the borough. Furthermore, improved property management is likely to result in better community relations.

With regards to landlords, the National cohort are proportionately more likely to be White and aged in their 50's. These proposals will therefore have a potentially, negatively, disproportionate effect on this cohort as there will be a cost attached to applying for the licence.

B.2) Did you carry out any consultation or engagement as part of this assessment?

Please tick ✓

No                      Yes ✓

The consultation on the proposed changes ran for 10 weeks from 31 October 2025 available via Hillingdon website.

The consultation was evidence-based and was hosted on the Hillingdon's website with a consultation pack outlining the findings of the feasibility study with proposals on the introduction of discretionary licensing in the borough.

Feedback and opinions were sought far and wide from as many people and organisations as possible who have an interest or personal experiences on the private rented sector in Hillingdon.

The consultation on the proposals used a range of consultation tools to engage all protected groups including outreach engagement to target groups that may not be responding as well as others.

From previous experience there has been a low response from tenants in HMOs, in particular from Black, Asian, or other ethnic groups who are disproportionately more likely to experience significant problems whilst renting in the PRS.

The range of tools included –

- Online Resident Survey. Accessibility was considered, and paper surveys were made available for those who needed them.
- Digital media. Facebook, `X (Twitter), Web Pages.
- Focus groups such as Landlord/Resident Forums and workshops.
- Ward forums
- Faith Groups
- Community Hubs
- Marketplace stalls
- Publicity campaign. Advertising the consultation widely was important to its success.

Communication with internal and external agencies to facilitate with the consultation was sought.

The results of the consultation will be made available along with a review of the outcomes. Anyone wishing to be individually informed of the consultation outcomes will be notified as part of the consultation process.

Key findings from the consultation indicate strong and widespread concern about the impact of Houses in Multiple Occupation (HMOs) on residential communities.

Many respondents expressed opposition to HMOs in principle, citing perceived links to anti- social behaviour, crime, noise, waste management issues, parking pressure and a loss of neighbourhood cohesion. Particular concern was raised about the concentration of HMOs in established and family- oriented areas, the cumulative impact on local services and the public realm, and the effects on groups considered more vulnerable due to age, disability or family status.

Respondents highlighted the potential for noise, overcrowding, poor waste management and reduced environmental quality to disproportionately affect children, older residents and people with disabilities, who may be more sensitive to such impacts or less able to mitigate them.

The consultation also revealed strong views on licensing design and enforcement, with many respondents supporting higher licence fees to fund robust inspection and enforcement activity and deter poorly managed HMOs, while others raised concerns about affordability and the risk of costs being passed on to tenants.

There were calls for clearer landlord accountability in relation to property standards, waste management, external maintenance and complaint handling, alongside demands for action against rogue landlords and illegal conversions, stronger planning controls, and improved transparency, reporting routes and communication between residents, landlords and the Council.

Some responses expressed concerns about the behaviour or background of HMO occupants; these views reflect perceptions and anxieties rather than evidence of disproportionate impacts linked to protected characteristics and underline the importance of ensuring that regulatory measures remain lawful, proportionate, non-discriminatory and focused on property standards and management practices.

Overall, the feedback reflects a desire for a balanced approach that improves management standards, protects residential amenity, supports community cohesion, and delivers positive outcomes for both HMO residents and the wider community while avoiding unintended discriminatory effects.

**B.3) Provide any other information to consider as part of the assessment**

Legal context

The Council has a duty to pay due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations (Equality Act 2010). The Council, as a public authority, is also required to comply with the Human Rights Act 1998 as well as the 2014 Act.

The Council's use of discretionary licensing across the Borough is considered a proportionate means to achieve a legitimate aim to pursue the wellbeing of occupiers of HMOs and the neighbourhood and for general public interest. It is anticipated that the proposal will not breach any of these Articles and will provide positive support for people's rights.

**C) Assessment**

What did you find in B1? Who is affected? Is there, or likely to be, an impact on certain groups?

C.1) Describe any **NEGATIVE** or **POSITIVE** impacts (actual or potential):

EQUALITY GROUP	IMPACT ON THIS GROUP AND ACTIONS NEEDED
<p><b>Younger and older residents</b></p>	<p>It is anticipated that the proposals will have a positive impact for this cohort in terms of their health especially for older people who may be more susceptible to hazards such as excess cold and falls.</p> <p>Targeted outreach will be necessary to maximise the benefits of licensing for this protected group to raise awareness.</p> <p>Care will be taken to ensure that information concerning the proposal is accessible to all with opportunities for signposting and support from partner organisations where appropriate.</p>

	<p>There may be a potential negative impact on this cohort if the landlord were to increase rent due to the proposed licence fee.</p>
<p><b>Women</b></p>	<p>It is anticipated that the proposals will have a positive impact for women as they are more likely to experience discrimination compared to men when renting.</p> <p>The assessment of landlords to be ‘fit and proper’ should reduce any potential discrimination for this cohort and the new arrangements will provide the ability to report unfair discrimination.</p> <p>Care will be taken to ensure that information concerning the proposal is accessible to all with opportunities for signposting and support from partner organisations where appropriate.</p> <p>There may be a potential negative impact on this cohort if the landlord were to increase rent due to the proposed licence fee.</p>
<p><b>Black, Asian or other ethnic groups</b></p> <p><b>White working class</b></p>	<p>It is anticipated that the proposals will have a positive impact for tenants who share these characteristics in terms of health and other inequalities.</p> <p>Targeted outreach will be necessary to maximise the benefits of licensing for this protected group to raise awareness and trust.</p> <p>Care will be taken to ensure that information concerning the proposal is accessible to all with opportunities for signposting and support from partner organisations where appropriate.</p> <p>The assessment of landlords to be ‘fit and proper’ should reduce any potential discrimination for this cohort and the new arrangements will provide the ability to report unfair discrimination.</p> <p>There may be a potential negative impact on this cohort if the landlord were to increase rent due to the proposed licence fee.</p>

<p><b>Disabled tenants</b></p>	<p>It is anticipated that the proposals will have a positive impact on disabled tenants in terms of health and other inequalities.</p> <p>Property inspections assess health and safety of living conditions. Supportive adaptations to properties will have a positive impact on physical and mental health.</p> <p>Licence holders who discriminate on the grounds of disability will also be held to account.</p> <p>Targeted outreach will be necessary to maximise the benefits of licensing for this protected group to raise awareness and trust.</p> <p>Care will be taken to ensure that information concerning the proposal is accessible to all with opportunities for signposting and support from partner organisations where appropriate.</p> <p>The assessment of landlords to be 'fit and proper' should reduce any potential discrimination for this cohort and the new arrangements will provide the ability to report unfair discrimination.</p> <p>There may be a potential negative impact on this cohort if the landlord were to increase rent due to the proposed licence fee.</p>
<p><b>LGBTQ+ community</b></p>	<p>The assessment of landlords to be 'fit and proper' should reduce any potential discrimination for this cohort and the new arrangements will provide the ability to report unfair discrimination.</p> <p>Care will be taken to ensure that information concerning the proposal is accessible to all with opportunities for signposting and support from partner organisations where appropriate.</p> <p>There may be a potential negative impact on this cohort if the landlord were to increase rent due to the proposed licence fee.</p>
<p><b>Community Cohesion and Safety</b></p>	<p>It is intended that the proposed licence arrangements will contribute to maintaining a clean and safe local environment by reducing the levels of waste and anti-social behaviour in the borough and act against those whose properties or tenants cause persistent ASB. This will potentially improve community cohesion and safety.</p>

<b>Human Rights</b>	<p>The Council, as a public authority, is also required to comply with the Human Rights Act 1998 as well as the 2014 Act.</p> <p>The Council's use of discretionary licensing across the Borough is considered a proportionate means to achieve a legitimate aim to pursue the wellbeing of occupiers of HMOs and the neighbourhood and for general public interest.</p> <p>It is anticipated that the proposal will not breach any of these Articles and will provide positive support for people's rights.</p>
<b>Religion/belief</b>	<p>The assessment of landlords to be 'fit and proper' should reduce any potential discrimination for those who share a characteristic of a religion or belief, and the new arrangements will provide the ability to report unfair discrimination.</p> <p>Care will be taken to ensure that information concerning the proposal is accessible to all with opportunities for signposting and support from partner organisations where appropriate.</p> <p>There may be a potential negative impact on this cohort if the landlord were to increase rent due to the proposed licence fee.</p>

## D) Conclusions

The key purpose of the scheme is to reduce antisocial behaviour, improve property conditions and management standards in HMOs. Addressing these criteria will have an impact on reducing the level of deprivation, which will benefit residents across all protected characteristics and particularly more vulnerable groups.

In particular, Black, Asian and other ethnic groups, families with young children, disabled residents and vulnerable adults will benefit from better enforcement of licence conditions and of the Housing Health and Safety Rating System standards.

All groups will benefit from improvements in engagement, communication and signposting information between the council, landlords and tenants and other service providers.

Information would relate to such matters as changes in the law affecting the PRS, energy efficiency measures and grants availability, information on local organisations and agencies which may be able to provide support.

The assessment has identified a potentially negative impact if landlords decide to increase rents, however, based on the experience of other Councils who have introduced licensing, we do not believe that licensing in itself should result in the need for landlords to increase rents.

The human rights of residents in the relevant areas will improve as the Additional Licensing scheme will have an impact on negative behaviours causing detriment to the area.

**COMPLETED BY:**



**Signed:**

**Name:** Stephanie Waterford

**Position held:** Head of Public Protection & Enforcement

**Dated:** 27<sup>th</sup> January 2026

**APPROVED BY:**



**Signed:**

**Name:** Richard Webb

**Position held:** Director Community Safety & Enforcement

**Dated:** 03/02/26