

## **Appendix E – Equality Impact Assessments**

<b>Proposal Ref</b>	<b>Proposal Name</b>	<b>EIA Needed?</b>
2025/26 001	Review Garage Voids	No
2025/26 004	Revenues & Benefits - Automations & Customer Contact	No
2025/26 005	Review of Cashflow Measures - Supplier Incentive Programme	No
2025/26 006	Reshaping Resident Hub	Yes - to be produced later, as part of staff consultation
2025/26 007	Digital and Technology Contract Review	No
2025/26 008	HR Service Review	Yes - to be produced later, as part of staff consultation
2025/26 009	Outsourcing of the Council's Film Office	No
2025/26 010	Registration Service Income	No
2025/26 011	Business Intelligence Review	Yes - to be produced later, as part of staff consultation
2025/26 012	Telecare Review	Yes - attached
2025/26 015	Platinum Jubilee Leisure Centre Management Fee	No
2025/26 016	Review Domestic Support Contracts	No
2025/26 017	Fast Track Planning Service	No
2025/26 018	Building Control Fee Uplift	No
2025/26 019	Discretionary Planning Fees Uplift	No
2025/26 020	Subsidy removal	No
2025/26 021	Review of Semi-Independent & Shared Accommodation	No
2025/26 023	New Care Offer - Review of Operating Model	No
2025/26 024	Review of Early Years Operating Model	No - completed last year
2025/26 025	Post 16 Policy change to offer Personal Transport Budgets	No - completed last year
2025/26 026	Creation of a SPV for Direct Care services	No
2025/26 067	Extended Producer Responsibility Grant	No
2025/26 068	HB Admin Subsidy	No
2026/27 002	Increase in Charges to Recover Court Costs	No
2026/27 014	Supplier Incentive Programme - Construction	No
2026/27 019	Hillingdon People Magazine	No
2026/27 027	Facilities management restructure	Yes - to be produced later, as part of staff consultation
2026/27 032	Corporate Management Team	No
2026/27 034	Digital take up	No
2026/27 050	Festive Light Residual Budget	No
2026/27 051	Legal Management Restructure	No
2026/27 057	Legal Research AI Licence	No
2026/27 070	Implementation of Additional Licensing Policy	Yes - attached
2026/27 077	Review of Pest Control discounts	Yes - attached
2026/27 080	Proceeds of Crime and POCA Investigations	No
2026/27 082	Annual Lettings Plan to allocate 400 social homes to households in B&B	Yes - one for all Housing proposals
2026/27 084	Housing for vulnerable families	Yes - one for all Housing proposals
2026/27 085	Additional Full Repair and TA Insure Leases	Yes - one for all Housing proposals
2026/27 086	Additional Leasing Scheme 1	Yes - one for all Housing proposals
2026/27 087	Reduced Cost Temporary Accommodation 1	Yes - one for all Housing proposals
2026/27 089	Reduced Cost Temporary Accommodation 2	Yes - one for all Housing proposals
2026/27 099	Resources for bereavement services	No
2026/27 109	Passenger Assistant supplier switch (Per Temps to Operator)	No
2026/27 110	Supported Living De-Commissioning	Yes - to be produced later, as part of consultation
2026/27 131	Transformation Team	No
2026/27 133	Communications Vacant Post Removal	No
2026/27 134	Grounds Maintenance service review	Yes - to be produced later, as part of staff consultation
2026/27 136	Waste Weekends - Powerday	No
2026/27 137	Increase Garden Waste Subscription fee	No
2026/27 138	Street Scene	Yes - to be produced later, as part of staff consultation
2026/27 139	Waste collection changes	Yes - to be produced later, as part of staff consultation
2026/27 140	Reduction in cost of recycling bags	No
2026/27 142	Weekend provision Cemetery and crematorium	No
2026/27 143	PRS accommodation 1	Yes - one for all Housing proposals
2026/27 145	Private Management Agreement Leasing Scheme	Yes - one for all Housing proposals
2026/27 147	Supported Housing	Yes - one for all Housing proposals
2026/27 148	PRS accommodation 2	Yes - one for all Housing proposals
2026/27 156	Service delivery model review	Yes - to be produced later, as part of staff consultation
2026/27 159	ULEZ expenditure	No
2026/27 160	Fleet management improvements	No
2026/27 162	NYGL civic amenities site	Yes - In due course when proposal detail further worked up - future year saving

2026/27 164	Street inspections digitally performed	No
2026/27 165	Digital Library Plan Pilot	Yes - attached
2026/27 172	Ceasing SEND Keyworking	No
2026/27 176	SEND Transport Demand 2026/27 to 2030/31	No
2026/27 182	Waste disposal management (resource)	No
2026/27 189	Additional Leasing Scheme 2	Yes - one for all Housing proposals
2026/27 190	Rapid PRS Rehousing	Yes - one for all Housing proposals
2026/27 191	Supported Housing - Rough Sleeper Pathway	Yes - one for all Housing proposals
2026/27 193	Reconciliation of Resident engagement cost	Yes - one for all Housing proposals
2026/27 197	Parking Services Programme Management Capacity	No
2026/27 198	Changes to parking tariffs	No
2026/27 201	Domestic Abuse Support Officer - service growth proposal	No
2026/27 213	Changes to parking payment options	Yes - attached
2026/27 214	Increase Homeless Prevention	Yes - one for all Housing proposals
2026/27 216	Efficiency Gain Fleet	No
2026/27 217	Digital Library Plan Phase 2	Yes - In due course when proposal detail further worked up - future year saving
2026/27 219	Council Tax Reduction Scheme	Yes - attached
2026/27 223	Theatres Operating Model	Yes - In due course when proposal detail further worked up - future year saving
2026/27 224	Bunker & Visitor Centre Operating Model	No
2026/27 229	Appointeeship Client Charges	Yes - attached
2026/27 231	Family Hubs - new grant	No
2026/27 235	Removal of Multiple Daily Free HFC Parking Sessions	No
2026/27 259	Additional Grant - Final LGFS	Yes - one for all Housing proposals

<b>EQUALITY IMPACT ANALYSIS FACTORS</b>											
<b>Proposal Name</b>	<b>Relevant to equality</b>	<b>Age</b>	<b>Disability</b>	<b>Gender Reassignment</b>	<b>Marriage/Civil Partnership</b>	<b>Pregnancy/ Maternity</b>	<b>Race/ Ethnicity</b>	<b>Religion/ Belief</b>	<b>Sex</b>	<b>Sexual Orientation</b>	<b>Cumulative impact</b>
Telecare Review	Y	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		White older women
Appointeeship Charges Proposal	Y	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>						<input checked="" type="checkbox"/>		White older men aged 55-64 with a learning disability
Implementation of Additional Licensing Policy	Y										All positive impacts
Review of Pest Control Discounts	Y	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>		Over 65s and those in receipt of means- tested benefits who are more likely to be from Pakistani & Bangladeshi backgrounds, women and/or have a disability
Changes to parking payment options	Y	<input checked="" type="checkbox"/>									Older people
Digital Library Plan Pilot	Y	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>								Older people and those with disabilities
Housing Needs	Y										All positive impacts
Council Tax Reduction Scheme	Y		<input checked="" type="checkbox"/>						<input checked="" type="checkbox"/>		Women and disabled people are more likely to be claimants and be affected



HILLINGDON  
LONDON

# Equality and Human Rights Impact Assessment

## PROPOSAL REF 2025/26 012: TELECARE REVIEW

### STEP 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

A review of the current Telecare Service model will be carried out which includes equipment provision, monitoring, responder arrangements, and the fees and charges associated with these services.

The purpose of the review is to develop a fair, transparent and sustainable approach that ensures residents can access Telecare support appropriate to their needs, while aligning Hillingdon's charging arrangements and service design with regional practice.

The review will ensure:

- Best value and long-term financial sustainability
- An equitable and consistent charging model
- A service that supports early intervention and promotes independence
- High-quality, modern, and accessible telecare pathways for all residents

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

Sarah Baker Assistant Director Adult Social Care Commissioning and Business

Delivery

Date assessment completed and approved by accountable person

27th January 2026

Names and job titles of people carrying out the assessment

Sarah Baker Assistant Director Adult Social Care Commissioning and Business Delivery

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

The main aim is to review and modernise Hillingdon's Telecare model so that equipment, service delivery, fees and charges, and early-intervention outcomes are fair, sustainable, aligned with best practice and have a positive effect on outcomes for residents.

**Intended benefits**

- Long-term sustainability of telecare provision
- Improved use of digital technologies and equipment
- A consistent, transparent, and equitable charging and service model
- A strengthened early-intervention approach that reduces crisis-led support
- Alignment with regional and national telecare practice
- Assurance that the model continues to deliver best value and supports independence and safety for residents

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

At the time of the review:

6,452 residents receive Telecare.

Their equality profile is presented below with data that is currently held:

Gender	Numbers	Percentage
Female	4,246	65.81%

Male	2,206	34.19%
<b>Grand Total</b>	<b>6,452</b>	<b>100%</b>
<b>Ethnicity</b>	<b>Numbers</b>	<b>Percentage</b>
Any other Asian background	192	2.98%
Any other black background	25	0.39%
Any other ethnic group	1,195	18.52%
Any other mixed background	40	0.62%
Any other White background	148	2.29%
As/Asian Brit-Pakistani	87	1.35%
Asian/Asian British-Indian	526	8.15%
Asian/Asn Brit-Bangladeshi	11	0.17%
Blk/Blk Brit-Caribbean	107	1.66%
Blk/Blk British-African	59	0.91%
Chinese background	18	0.28%
English	263	4.08%
Irish	121	1.88%
Mixed-White & Asian	9	0.14%
Mixed-White/Blk African	5	0.08%
Mixed-White/Blk Carib	10	0.15%
Northern Irish	1	0.02%
Refused to disclose	103	1.60%
Scottish	8	0.12%
Welsh	5	0.08%
White British	3,445	53.39%
White Irish	75	1.16%
<b>Grand Total</b>	<b>6,452</b>	<b>100%</b>
<b>Age</b>	<b>Numbers</b>	<b>Percentage</b>
0-17	14	0.22%
18-64	495	7.67%
65-74	821	12.72%
75-84	2,068	32.05%
85-94	2,610	40.45%
95+	444	6.88%
<b>Grand Total</b>	<b>6,452</b>	<b>100%</b>

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

<b>Stakeholders</b>	<b>Interest</b>
Residents using Telecare monitoring and responder service, their families, carers and Next of Kin.	<p>To ensure that any proposed changes are communicated effectively including how charges may be applied, amended or structured.</p> <p>To ensure that there is full engagement and consultation regarding any transition arrangements.</p> <p>To be reassured that Telecare will continue to provide safe, effective and cost-efficient support to those who need it.</p> <p>To ensure that any changes will not compromise quality and residents will continue to receive timely and appropriate support, particularly in maintaining independence.</p>
Corporate Director Adult Social Care and Health	<p>To ensure that any proposed changes are communicated effectively including how charges may be applied, amended or structured.</p> <p>To be reassured that Telecare will continue to provide safe, effective and cost-efficient support to those who need it.</p> <p>To ensure that any changes will not compromise quality and residents will continue to receive timely and appropriate support, particularly in maintaining independence.</p> <p>To ensure that the Telecare model is sustainable, equitable, evidence-based and aligned with regional practice, ensuring that resources are available to continue to maintain and enhance the service if required.</p> <p>To ensure the revised model is</p>

	<p>deliverable, efficient, and supported by appropriate processes and engagement</p> <p>To ensure that there are full engagement and consultation activities regarding any transition arrangements.</p>
<p>Council Leader and Cabinet</p>	<p>To ensure that any proposed changes are communicated effectively including how charges may be applied, amended or structured.</p> <p>To be reassured that Telecare will continue to provide safe, effective and cost-efficient support to those who need it.</p> <p>To ensure that any changes will not compromise quality and residents will continue to receive timely and appropriate support, particularly in maintaining independence.</p> <p>To ensure that the Telecare model is sustainable, equitable, evidence-based and aligned with regional practice, ensuring that resources are available to continue to maintain and enhance the service if required.</p> <p>To ensure the revised model is deliverable, efficient, and supported by appropriate processes and engagement</p> <p>To ensure that there are full engagement and consultation activities regarding any transition arrangements.</p>

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

Age	✓	Sex	✓
Disability		Sexual Orientation	
Gender reassignment		Socio-economic status	
Marriage or civil partnership		Carers	
Pregnancy or maternity		Community Cohesion	
Race/Ethnicity	✓	Community Safety	
Religion or belief		Human Rights	

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

B.1) Consideration of information and data - what have you got and what is it telling you?

- At the time of the proposal there are 6452 residents receiving telecare
- 92% of telecare users are older people and 80% are over 75 meaning any review of the model has a proportionately higher relevance to this group.
- 66% of women use telecare, reflecting demographic trends in life expectancy and disability in older age.
- The ethnic profile shows 60 % of people from White backgrounds, who represent a significant proportion of current service demand.

The proposals therefore may have a disproportionately negative impact on White women aged 75 – 94.

Any review of the model, including fees and charges, must ensure inclusive access and avoid disadvantaging older residents, disabled residents, or those on lower incomes.

Affordability is a core consideration, as telecare supports statutory duties around prevention, wellbeing and safety.

Any changes to the charging model must be designed to remain fair, transparent and

consistent, with mitigations for residents on low incomes where appropriate.

## Consultation

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

Please tick ✓      NO       YES

No consultation has been carried out to date however if the proposal is agreed in principle, then a full consultation exercise will take place with all residents in receipt of telecare, their families and any other relevant stakeholders.

It is acknowledged that early and transparent stakeholder engagement is vital to ensure that any resistance and potential emotional distress to the residents is considered and is mitigated wherever possible.

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

### Legal context

The council has a public duty to pay due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations (Equality Act 2010)

### Financial context

The savings attached to this review is £400k which reinforces the need for a sustainable model that enables continuity of service while complying with the Care Act 2014.

### National policy context

The Care Act 2014 sets out a wide range of statutory duties for local authorities, focused on promoting individual wellbeing, preventing and delaying needs, ensuring safety, and supporting people to live independently for as long as possible. Telecare directly supports these duties in several key ways including:

- Promoting wellbeing
- Preventing and delaying needs
- Ensuring safety
- Meeting eligible assessed needs
- Supporting carers
- Delivering integrated, modern, preventative care
- Maintaining a sustainable social care market

It is one of the most cost-effective and risk-reducing ways to fulfil the Council's Care Act obligations while enabling residents to remain safe, independent, and confident in their own homes.

### 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** impacts (actual or potential):

Equality Group	Impact on this group and actions you need to take
Older People	<p>As 92% of people using telecare are older people and 80% of people using telecare are over 75 the proposal to review the telecare model will potentially have a negative impact on this group.</p> <p>Changes to the telecare model, including the introduction or revision of fees and charges, may create affordability concerns or cause anxiety for residents.</p> <p>Any changes to the charging model must be designed to remain fair, transparent and consistent, with mitigations for residents on low incomes where appropriate.</p> <p>Residents will continue to have the option to return equipment if they choose not to continue with the service.</p> <p>Residents may choose to source telecare privately; however, private providers are also likely to be chargeable.</p> <p>If the proposal is agreed in principle, then a full consultation exercise will take place with all residents in receipt of telecare, their families and any other relevant stakeholders.</p>
Women	<p>As there is a fairly high percentage of women the proposal to review the telecare model will potentially have a negative impact on this group.</p> <p>Changes to the telecare model, including the introduction or revision of fees and charges, may create affordability concerns or cause anxiety for residents.</p> <p>Any changes to the charging model must be designed to remain fair, transparent and consistent, with mitigations for residents on low incomes where appropriate.</p> <p>Residents will continue to have the option to return equipment if they choose not to continue with the service.</p>

	<p>Residents may choose to source telecare privately; however, private providers are also likely to be chargeable.</p> <p>If the proposal is agreed in principle, then a full consultation exercise will take place with all residents in receipt of telecare, their families and any other relevant stakeholders.</p>
From a white group or background	<p>As there is a high percentage of people from a white group or background, the proposal to review the telecare model will potentially have a negative impact on this group.</p> <p>Changes to the telecare model, including the introduction or revision of fees and charges, may create affordability concerns or cause anxiety for residents.</p> <p>Any changes to the charging model must be designed to remain fair, transparent and consistent, with mitigations for residents on low incomes where appropriate.</p> <p>Residents will continue to have the option to return equipment if they choose not to continue with the service.</p> <p>Residents may choose to source telecare privately; however, private providers are also likely to be chargeable.</p> <p>If the proposal is agreed in principle, then a full consultation exercise will take place with all residents in receipt of telecare, their families and any other relevant stakeholders.</p>

C.2) Describe any **POSITIVE** impacts

<b>Equality Group</b>	<b>Impact on this group and actions you need to take</b>
Older People	<p>A modernised and sustainable service ensures continued availability of telecare.</p> <p>A clear, equitable and consistent fees and charges structure promotes fairness, transparency, and alignment with regional practice.</p> <p>Residents benefit from improved equipment pathways and early-intervention support that remain cost-effective and outcome-focused.</p>

Women	<p>A modernised and sustainable service ensures continued availability of telecare.</p> <p>A clear, equitable and consistent fees and charges structure promotes fairness, transparency, and alignment with regional practice.</p> <p>Residents benefit from improved equipment pathways and early-intervention support that remain cost-effective and outcome-focused.</p>
From a white group or background	<p>A modernised and sustainable service ensures continued availability of telecare.</p> <p>A clear, equitable and consistent fees and charges structure promotes fairness, transparency, and alignment with regional practice.</p> <p>Residents benefit from improved equipment pathways and early-intervention support that remain cost-effective and outcome-focused.</p>

## D) Conclusions

The review of the telecare service model, including a review of the fees and charges framework will help ensure the service is financially viable, equitable and aligned with best practice. The review is intended to ensure the service remains fair, sustainable, and future-proof, supporting early intervention and improved outcomes for residents.

As any change may cause uncertainty, especially for older residents, women and other frequent users of telecare, strong communication, comprehensive engagement, and careful equality analysis of any future proposals will be essential to minimise risk.

The Council will continue to monitor impacts throughout the process to ensure that no group is disproportionately affected and that the service remains accessible, equitable and aligned with the needs of all residents.

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Signed and dated:  27th January 2026.....

**Name and position:** Sarah Baker  
Assistant Director Commissioning and Business  
Delivery.....

# Equality and Human Rights Impact Assessment

## PROPOSAL REF 2026/27 229: Appointeeship Client Charges

### STEP 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

The proposal is to embed the appointeeship client fees within the Adult Social Care Charging Policy.

The charges are being moved in line with deputyship client charges which are set by the courts.

ASC clients with over £1k capital will be charged £11 per week for residential appointeeship and £15 per week for non-residential appointeeship.

This EIA assesses the impact on protected characteristic groups of the current appointeeship clients and the active ASC client cohorts that could require appointeeship arrangements in the future.

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

Steve Muldoon – Corporate Director of Finance  
Phil Hedges – Head of Transactional Finance

Date assessment completed and approved by accountable person

Completed: 26.01.2026

Names and job titles of people carrying out the assessment

Phil Hedges – Head of Transactional Finance. Debbie Lampard – CFA Team Leader.  
Vicky Trott – Inclusion and Wellbeing Manager

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

The benefit of implementing the charges is to contribute towards the cost of providing client financial affairs services (deputyship and appointeeship) for vulnerable residents who are unable to manage their own finances.

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

Data is presented below for all active ASC clients as they may require the appointeeship service in the future, and all current appointeeship clients.

There are currently 3484 active ASC clients.

**Ethnicity**

1886 are white (54.13%)

712 are Asian/Asian British (20.44%)

342 are Black/African/Caribbean/Black British (9.82%)

73 are mixed ethnicity (2.1%)

455 are other ethnicities (13.06%).

**Sex**

1930 are female (55.4%)

1554 are male (44.6%)

**Disability/Support Reason**

1492 require Physical Support (42.82%)

797 require Learning Disability Support (22.88%)

501 require Support with Memory and Cognition (14.38%)

419 require Mental Health Support (12.03%)  
270 require Social Support (7.75%).

**Age**

18-24 - 180 (5.2%)  
25-34 – 284 (8.1%)  
35-44 – 291 (8.3%)  
45-54 – 337 (9.7%)  
55-64 – 535 (15.3%)  
65-74 – 518 (14.9%)  
75-84 – 641 (18.4%)  
85-94 – 571 (16.4%)  
95+ - 127 (3.6%)

There are 104 appointeeship clients with a current service:

**Ethnicity**

80 clients are white (76.92%)  
10 are Asian/Asian British (9.62%)  
9 are Black/African/Caribbean/Black British (8.65%)  
1 is mixed ethnicity (0.96%)  
4 are other ethnic group (3.85%).

**Sex**

39 are female (37.5%)  
65 are Male (62.5%)

**Disability/Support Reason**

69 require Learning Disability Support (66.4%)  
18 require Mental Health Support (17.3%)  
11 require Physical Support (10.6%)  
5 require Support with Memory and Cognition (4.8%)  
1 requiring Social Support (1%)

**Age**

18-24 - 1 (1%)  
25-34 – 11 (10.5%)  
35-44 – 10 (9.6%)  
45-54 – 15 (14.4%)  
55-64 – 38 (36.5%)

65-74 – 12 (11.5%)
75-84 – 13 (12.5%)
85-94 – 4 (3.8%)
95+ - 0 (0%)

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

<b>Stakeholders</b>	<b>Interest</b>
ASC service users – current appointeeship clients	To ensure the charges are fair, affordable, in accordance with the service provided and adhere to the Care Act and other relevant legislation.
ASC service users – potential future appointeeship clients	To ensure the charges are fair, affordable, in accordance with the service provided and adhere to the Care Act and other relevant legislation.
Family, next of kin or client representatives	To ensure the charges are fair, affordable, in accordance with the service provided and adhere to the Care Act and other relevant legislation.
Director of Adult Social Care and Health	Provide a fair and transparent approach to increasing charges.  To ensure the charges are fair, affordable, in accordance with the service provided and adhere to the Care Act and other relevant legislation.  To ensure value for money in service delivery.
Director of Finance	Provide a fair and transparent approach to increasing charges.  To ensure the charges are fair, affordable, in accordance with the service provided and adhere to the Care Act and other relevant legislation.

	To ensure value for money in service delivery.
Council Cabinet and Leader	Provide a fair and transparent approach to increasing charges.  To ensure the charges are fair, affordable, in accordance with the service provided and adhere to the Care Act and other relevant legislation.  To ensure value for money in service delivery.

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

Age	✓	Sex	✓
Disability	✓	Sexual Orientation	
Gender reassignment		Socio-economic status	
Marriage or civil partnership		Carers	✓
Pregnancy or maternity		Community Cohesion	
Race/Ethnicity	✓	Community Safety	
Religion or belief		Human Rights	

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

B.1) Consideration of information and data - what have you got and what is it telling you?

Comparisons between the current active ASC clients and current appointeeship clients is shown below.

1) Ethnicity (%)

<b>Ethnicity</b>	<b>All Active ASC Clients</b>	<b>Current Appointeeship Clients</b>	<b>Difference (Appointeeship – All Active)</b>
<b>White</b>	54.13%	76.92%	<b>+22.79 pp</b>
<b>Asian / Asian British</b>	20.44%	9.62%	<b>-10.82 pp</b>
<b>Black / African / Caribbean / Black British</b>	9.82%	8.65%	<b>-1.17 pp</b>
<b>Mixed ethnicity</b>	2.10%	0.96%	<b>-1.14 pp</b>
<b>Other ethnicities</b>	13.06%	3.85%	<b>-9.21 pp</b>

The **Current Appointeeship** group is **proportionately more from a White ethnic background** (+22.79pp) compared to the ASC client cohort as a whole.

2) Sex (%)

<b>Sex</b>	<b>All Active ASC Clients</b>	<b>Current Appointeeship Clients</b>	<b>Difference (Appointeeship – All Active)</b>
<b>Female</b>	55.4%	37.5%	<b>-17.9 pp</b>
<b>Male</b>	44.6%	62.5%	<b>+17.9 pp</b>

**Current Appointeeship** clients are **proportionately more male than female** when compared to the ASC client cohort as a whole.

3) Disability / Support Reason (%)

<b>Disability / Support Reason</b>	<b>All Active ASC Clients</b>	<b>Current Appointeeship Clients</b>	<b>Difference (Appointeeship – All Active)</b>
<b>Physical Support</b>	42.82%	10.6%	<b>-32.22 pp</b>
<b>Learning Disability Support</b>	22.88%	66.4%	<b>+43.52 pp</b>
<b>Support with Memory &amp; Cognition</b>	14.38%	4.8%	<b>-9.58 pp</b>

<b>Mental Health Support</b>	12.03%	17.3%	<b>+5.27 pp</b>
<b>Social Support</b>	7.75%	1.0%	<b>-6.75 pp</b>

There are proportionately **more current appointeeship** clients who have **Learning Disability Support** compared to the ASC client cohort as a whole.

#### 4) Age band (%)

<b>Age band</b>	<b>All Active ASC Clients</b>	<b>Current Appointeeship Clients</b>	<b>Difference (Appointeeship – All Active)</b>
<b>18–24</b>	5.2%	1.0%	<b>-4.2 pp</b>
<b>25–34</b>	8.1%	10.5%	<b>+2.4 pp</b>
<b>35–44</b>	8.3%	9.6%	<b>+1.3 pp</b>
<b>45–54</b>	9.7%	14.4%	<b>+4.7 pp</b>
<b>55–64</b>	15.3%	36.5%	<b>+21.2 pp</b>
<b>65–74</b>	14.9%	11.5%	<b>-3.4 pp</b>
<b>75–84</b>	18.4%	12.5%	<b>-5.9 pp</b>
<b>85–94</b>	16.4%	3.8%	<b>-12.6 pp</b>
<b>95+</b>	3.6%	0.0%	<b>-3.6 pp</b>

There are proportionately **more current appointeeship** clients who are **aged 55-64** compared to the ASC client cohort as a whole.

#### Summary:

77% of the current appointeeship client base is White, however in the future the cohort of clients that may be impacted are 20% Asian/British Asian or 10% Black/African/Carribbean/Black British.

66% of the current appointeeship client base receive Learning Disability Support and 17% Mental Health Support. Future clients are more likely to require these type of support as clients referred to client financial affairs typically lack capacity to manage their own finances.

Comparison of age range stats between current and the potential future client cohort identifies that appointeeship clients are most likely to be in the 55-64 age range. 36% current appointeeship clients sit in this range currently. Appointeeship clients are 13% less likely to be from the 85-94 years aged bracket than the ASC client cohort, however this could change over time with the population ageing.

In terms of sex, current CFA clients 62% male, 18% more than the overall percentage in the active ASC client cohort.

In overall terms, white men aged 55-64 with a learning disability are proportionately more likely to be affected by the proposals.

## Consultation

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

Please tick ✓      NO ✓      YES

No consultation has been carried out directly as part of this assessment however should the proposal be agreed in principle, a full consultation exercise is planned.

- Whilst there is no provision in the Care Act (2014) itself requiring the Council to consult on local practice there are several areas of decision making highlighted in the Care and Support Statutory Guidance where consultation is advised. This includes decisions about a Council's charging policy.
- In accordance with best practice, the consultation period would run for 6 weeks. The primary stakeholders in the consultation are the current and future appointeeship residents supported by the client financial affairs team in Hillingdon, their carers, their representatives, family and friends and the providers of care services. It will also be of interest to residents and the voluntary sector more broadly.
- Given that the residents affected by the proposal do not have the capacity to manage their own finances, their best interests will be duly considered when evaluating the proposal's impact as part of the consultation process

The consultation will provide:

- The context, the start and end dates, who is invited to respond, what will be done with the responses and next steps.
- The questions will have a narrative to explain what we are asking and why, and where possible an example or scenario.

- We will ask questions to understand the demographics of the respondents to ensure there is fair representation from individuals and groups of people who share common characteristics.
- The consultation will be undertaken online with paper forms being made available. A direct mailing will be sent to all current users of services or to their representative along with current service providers. The consultation will be promoted on social media and the council's website.
- A further report will be produced following the conclusion of the consultation process and this will include an updated Equality Impact Analysis.

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

Legal context

The council has a public duty to pay due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations (Equality Act 2010)

National Policy Context:

Whilst there is no provision in the Care Act (2014) itself requiring the Council to consult on local practice there are several areas of decision making highlighted in the Care and Support Statutory Guidance where consultation is advised. This includes decisions about a Council's charging policy.

**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** impacts (actual or potential):

<b>Equality Group</b>	<b>Impact on this group and actions you need to take</b>
<b>White Males between 55-64.</b>	Currently 62% of appointeeship clients are male, 77% white and 36.5% in the 55-64 age group. These clients

	<p>may be disproportionately negatively impacted by this change due to the costs being incurred.</p> <p>We will ensure that clients and their representatives are briefed and kept up to date with information related to the proposals.</p> <p>We will carry out regular engagement activities with this group to ensure everyone is fully informed of the changes and supported through any transition arrangements.</p>
<b>People requiring Learning Disability Support or Mental Health Support</b>	<p>83% of active appointeeship clients require these support options and are to be impacted by the introduction of these charges.</p> <p>We will ensure that clients and their representatives are briefed and kept up to date with information related to the proposals.</p> <p>We will carry out regular engagement activities with this group to ensure everyone is fully informed of the changes and supported through any transition arrangements.</p>

C.2) Describe any **POSITIVE** impacts

<b>Equality Group</b>	<b>Impact on this group and actions you need to take</b>

**D) Conclusions**

We recognise that the proposed charges will impact on current and future appointeeship clients who share protected characteristics of age, disability and sex.

The groups that are impacted most by the proposal are White Males aged between 55-64 and those clients requiring Learning Disability Support or Mental Health Support.

The changes proposed are intended to have a positive impact in funding the client financial affairs service. This will support additional clients receiving the service in the future and improve the service for existing appointeeship clients.

The negative impacts have been mitigated by a proposal which doesn't charge those clients under a £1k capital threshold. The charges proposed are also consistent with deputeeship client charges which are set by the courts.

We will ensure that clients and their representatives are briefed and kept up to date with information related to the proposals and carry out regular engagement activities with this group to ensure everyone is fully informed of the changes and supported through any transition arrangements.

We will continue to review the impact of the proposal throughout the consultation process and further equality impact analysis will be carried out where appropriate.

**Signed and date:**  27.01.2026

**Name and position:** Phil Hedges - Head of Transactional Finance



HILLINGDON  
LONDON

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

## PROPOSAL REF 2026/27 070 IMPLEMENTATION OF ADDITIONAL LICENSING POLICY

### 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 Resident’s Services  
Richard Webb, Director of Community Safety & Enforcement

Date assessment completed and approved by accountable person

Completed – 27 January 2026  
Signed

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 HMOs 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 HMOs 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> </ul>

	<ul style="list-style-type: none"> <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>
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 will be considered, and paper surveys will be made available for those who need 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):**

<b>EQUALITY GROUP</b>	<b>IMPACT ON THIS GROUP AND ACTIONS NEEDED</b>
<b>Younger and older residents</b>	<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:**



HILLINGDON  
LONDON

# Equality and Human Rights Impact Assessment

## PROPOSAL REF 2026/27 077: REVIEW OF PEST CONTROL DISCOUNTS

### STEP 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

Cessation of subsidised pest control service for Hillingdon residents

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

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

Date assessment completed and approved by accountable person

27/01/2026

Names and job titles of people carrying out the assessment

Richard Webb – Director of Community Safety and Enforcement

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

The Council's subsidised pest control service currently provides a free or reduced cost services as follows:

Treatment of rats and mice inside the home and rat nests in the garden (3 visits):

- Free for Council tenants and all homeowners over-65
- £15 for owner occupier and council leaseholders in receipt of means tested benefits (includes income support, housing benefit, council tax benefits, pension credit, tax credit and working tax credit, Universal Credit and income-related job seekers allowance)

Treatment of wasps:

- £52 for 1 visit for Council tenants or council leaseholders

Treatment of cockroaches, squirrels, mortar bees, pharaoh ants and woodworm:

- Free for council tenants

The proposal is to end the non-statutory subsidised element of a pest control service which would provide a cost saving to the council.

The offer for Council tenants would remain unaffected as that is separately funded through the Housing Revenue Account and managed by the Property Services team.

The Council will continue to undertake pest control on its property and where legally required.

Pest control services will remain available to residents through private pest control providers. The end of the subsidised service offer means that these services will probably be at a higher cost to residents who were previously eligible for the subsidised service. Therefore, the impact of the end of the subsidised service will be mainly financial.

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

The proposal will affect homeowners over 65 and those on means tested benefits, who will no longer be able to access the subsidised offer.

According to the Census 2021:

13.5% of the population in Hillingdon are aged 65+

Those on means tested benefits are more likely to have a lower socio-economic status. Although this is not a protected characteristic under the Equality Act 2010, socio-economic status is linked to other protected characteristics:

Pakistani & Bangladeshi groups most likely to be in low income

Women more likely than men to have never worked/be long-term unemployed and have higher disability rates

## Disabled people face disproportionately poor economic, housing, and employment outcomes

[Protected characteristics by disability status, England and Wales: Census 2021 - Office for National Statistics](#)

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

<b>Stakeholders</b>	<b>Interest</b>
Residents over 65 and those in receipt of means tested benefits	<p>To ensure that pest control services are provided in a cost effective, fair and transparent manner.</p> <p>To ensure they can access an alternative affordable pest control service should they require it.</p> <p>To ensure they can access financial support if required.</p> <p>To ensure that that the council prevents health risks arising from pest infestations.</p>
Hillingdon residents	<p>To ensure that pest control services are provided in a cost effective, fair and transparent manner.</p> <p>To ensure that that the council prevents health risks arising from pest infestations.</p> <p>To ensure that the council provides a cost effective and efficient mechanism to report and resolve environmental problems impacting on residents and where aligned to functions and duties of the Council.</p>
Director of Community Safety and Enforcement	<p>To ensure that pest control services are provided in a cost effective, fair and transparent manner.</p>

	<p>To ensure that that the council prevents health risks arising from pest infestations.</p> <p>To ensure that the council provides a cost effective and efficient mechanism to report and resolve environmental problems impacting on residents and where aligned to functions and duties of the Council.</p>
Corporate Director of Residents Services	<p>To ensure that pest control services are provided in a cost effective, fair and transparent manner.</p> <p>To ensure that that the council prevents health risks arising from pest infestations.</p> <p>To ensure that the council provides a cost effective and efficient mechanism to report and resolve environmental problems impacting on residents and where aligned to functions and duties of the Council.</p>
Leader of the Council and Council Cabinet	<p>To ensure that pest control services are provided in a cost effective, fair and transparent manner.</p> <p>To ensure that that the council prevents health risks arising from pest infestations.</p> <p>To ensure that the council provides a cost effective and efficient mechanism to report and resolve environmental problems impacting on residents and where aligned to functions and duties of the Council.</p>

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

Age	✓	Sex	✓
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Disability	✓	Sexual Orientation	
Gender reassignment		Socio-economic status	✓
Marriage or civil partnership		Carers	
Pregnancy or maternity		Community Cohesion	
Race/Ethnicity	✓	Community Safety	
Religion or belief		Human Rights	

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

B.1) Consideration of information and data - what have you got and what is it telling you?

The proposal will affect homeowners over 65 and those in receipt of means tested benefits, who will no longer be able to access the subsidised offer.

The proposal may therefore have a disproportionately negative impact on people from these groups from the perspective of potential financial disadvantage.

The cohort of people who are in receipt of means tested benefits are more likely to be from a Pakistani or Bangladeshi background, be women and/or have a disability.

### **Consultation**

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

Please tick ✓ NO ✓ YES

No specific consultation has taken place as part of this assessment.

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

Legal context

The Council has a duty under the Equality Act 2010 to-

- To eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act;
- To advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
- To foster good relations between people who share a protected characteristic and people who do not share it.

The Council, as a public authority, is also required to comply with the European Convention on Human Rights.

Article 8 of the ECHR provides that everyone has the right to respect for his private and family life, his home and his correspondence and that there shall be no interference by public authority with the exercise of this right except such as “in accordance with the law” and “necessary in a democratic society”.

The Council has a number of statutory duties relating to pest infestations.

Under the Environmental Protection Act 1990 (EPA 1990) pest infestations can constitute a statutory nuisance when they pose a risk to health. Local authorities must investigate complaints of statutory nuisance, including those caused by pests. This typically arises as a result of accumulated refuse, unhygienic waste storage, or poor structural conditions.

Under the Housing Act 2004 pests are considered a hazard to health (e.g., rats, mice, cockroaches, bed bugs). As a result, the Council in some circumstances has a duty to address pest infestation in residential property.

Pest control is a core responsibility for businesses preparing food for sale or supply, and local authorities have duties under food safety legislation to ensure businesses have pest management systems in place to prevent health risks arising.

Businesses have a statutory duty of care over their waste, to ensure it is managed in a way that does not create environmental problems or hazards.

Local authorities have duties to ensure businesses manage their waste in accordance with those legal responsibilities. A failure to manage waste appropriately can create food sources for pests, leading to an infestation.

The Council does not have a statutory duty to provide pest control services for residents or to provide subsidised pest control services.

The service change does not impact on the way in which the Council will seek to discharge its statutory duties concerning pest infestations or health risks relating to pests.

#### Budget context

The offer of 3 free pest control visits to homeowners aged over 65 or in receipt of means tested benefits is administered by Customer Contact Centre but the budget

for this service is held by the Street Scene Enforcement team. The budget is £47.3k p.a. but normally overspends as the cost of services provided to eligible residents exceeds the budget. The budget is supported by the general revenue fund.

## 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** impacts (actual or potential):

<b>Equality Group</b>	<b>Impact on this group and actions you need to take</b>
<b>Residents aged over 65</b>	<p>Residents aged over 65 will no longer receive subsidised pest control services from the Council.</p> <p>The proposal may therefore have a disproportionately negative impact on this group.</p> <p>All reports of pest infestations that are assessed as potentially falling within one of the statutory duties of the Council will still be investigated by the Council. These legal duties apply so that any infestation that is likely to be hazardous to health will still require action from the Council.</p> <p>Pest infestations in Council property will continue to be investigated by the Council.</p> <p>If implemented, the impact of the proposal will be monitored.</p>
<b>Residents in receipt of means tested benefits who are more likely to be from Pakistani or Bangladeshi backgrounds, women and/or those with a disability</b>	<p>Residents in receipt of means tested benefits will no longer receive subsidised pest control services from the Council.</p> <p>The proposal may therefore have a disproportionately negative impact on this cohort including those who share protected characteristics including those from Pakistani or Bangladeshi backgrounds, women and/or those with a disability.</p> <p>All reports of pest infestations that are assessed as potentially falling within one of the statutory duties of the Council will still be investigated by the Council.</p>

	<p>These legal duties apply so that any infestation that is likely to be hazardous to health will still require action from the Council.</p> <p>Pest infestations in Council property will continue to be investigated by the Council.</p> <p>If implemented, the impact of the proposal will be monitored.</p>
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C.2) Describe any **POSITIVE** impacts

<b>Equality Group</b>	<b>Impact on this group and actions you need to take</b>
All	The efficiencies generated from the withdrawal of this service will ensure that other services which face higher levels of demand or which support the most vulnerable in the area can continue to be provided.

## D) Conclusions

We recognise that the proposal to withdraw the subsidised pest control service will directly negatively residents who are currently eligible for those services and who would have otherwise accessed those services.

These impacts will be financial since the services remain available but at a higher cost and will only impact on a small proportion of the population of the borough given the number of people who currently access this service.

The change will provide cost reductions to the council allowing the Council to avoid or minimise service reductions in other functions it provides and therefore consideration of the impact of this change has to be balanced against the impacts on other functions if this non-statutory service continued to be funded.

We recognise that the end of the subsidised service for people in receipt of means tested benefits will result in people of lower socio-economic status losing access to a subsidised service that they may need. However, the Council will still act on reports of pest infestations when it has a statutory duty to do so, which will mitigate the impacts of this service change on residents.

Signed and dated:



27/01/2026

**Name and position:** Richard Webb, Director of Community Safety and Enforcement



# Equality and Human Rights Impact Assessment

## PROPOSAL REF 2026/27 213: CHANGES TO PARKING PAYMENT OPTIONS

### STEP 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

The proposal is to remove pay and display machines used for payments for parking, so that all payments for parking sessions in the Council's car parks and on on-street parking bays, will need to be made using the PaybyPhone service or in PayPoint shops only.

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

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

Date assessment completed and approved by accountable person

27/01/2026

Names and job titles of people carrying out the assessment

Richard Webb, Director of Community Safety and Enforcement

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

As a result of the budget pressures facing the Council, it has been necessary to

review service provision across the whole Council to identify opportunities to reduce cost and set a balanced budget for 2026/27 onwards. During this review there has been a need to reconsider all services provided by the Council.

The Council provides car parking facilities both through car parks and on-street parking bays. Users of those parking facilities where payment is required currently have 3 options to pay for their parking session: pay by phone, and either card payment or cash at the parking machines.

The Council is considering removing pay and display machines, which will mean that motorists using the Council's car parks and on-street parking bays will need to use the PaybyPhone payment service or in PayPoint shops only.

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

Users of the Council's car parks and on-street parking bays are affected by this proposal.

These are universal services provided for all residents of the borough and visitors to the borough.

No equality data is obtained on users of the Council's parking facilities but it is reasonable to assume that anyone who can drive may use these facilities and there is no reason to suspect that the equality profile of those users differs from that of the drivers in the borough as a whole.

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

<b>Stakeholders</b>	<b>Interest</b>
Car park and on-street parking bay users	To be able to pay for parking quickly and easily.
Local businesses	To ensure that potential customers can park easily near their businesses.
Director of Community Safety and Enforcement	To ensure residents and visitors can pay for parking quickly and easily.  To provide a value for money parking service.
Corporate Director of Residents Services	To ensure residents and visitors can pay for parking quickly and easily.  To provide a value for money parking service.

Leader of the Council and Council Cabinet	To ensure residents and visitors can pay for parking quickly and easily.  To provide a value for money parking service.
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A.4) Which protected characteristics or community issues are relevant to the assessment? ✓ in the box.

Age	✓	Sex	
Disability		Sexual Orientation	
Gender reassignment		Socio-economic status	
Marriage or civil partnership		Carers	
Pregnancy or maternity		Community Cohesion	
Race/Ethnicity		Community Safety	
Religion or belief		Human Rights	

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

B.1) Consideration of information and data - what have you got and what is it telling you?

### Demographic data and information

No data is obtained during the provision of parking services which informs us about the user profile of people paying to park in our car parks or on-street. It is reasonable to assume that anyone who can drive may use these parking facilities.

Data published by the Financial Conduct Authority estimates that around 2% of the adult population in this country do not have bank accounts. This proposal will impact those people but it is likely that a lower proportion of people who drive cars have no access to a bank account than the wider general population given the cost of motoring general and the need to have insurance.

USwitch research from 2025 identified that 96% of the population are mobile phone users. However, the proportion of older people who do not use mobile phones is greater than the population as a whole, with around 12% of older people not using mobile phones according to AgeUK.

Research also shows that around 39% of over 65's do not feel confident using a smart phone, with data from Ofcom showing that only 68% of those aged 65 or over use a smartphone to go online. [Adults' Media use and attitudes report 2024](#)

Data on mobile phone usage in London is similar to the UK population as a whole. It is likely that the proportion of people without access to a mobile phone who also drive is likely to be lower than for the general population as a whole.

Barriers to mobile phone ownership are similar to barriers to car ownership and usage, and include cost and physical limitations.

The proposal will not affect people who have a blue badge to enable them to park in parking bays reserved for blue badge holders since that parking will remain free.

#### Type of payment

Removing the pay and display machines will primarily affect cash payments since payment by card can still be made by phone.

The Parking Services team keep data on the overall transactions by car park and for on-street parking. Overall, between 1<sup>st</sup> December 2024 and 30<sup>th</sup> November 2025, there were a total of 145,411 parking transactions paid for with cash, out of a total of 4,202,454 transaction (3.4%).

Over the same period £303,181 of payments for parking were made with cash, out of a total of £5,269,334 received (5.7%).

This data shows considerable variation in the use of cash to pay for parking in car parks, with the highest proportion of cash payments being Devonshire Lodge Car Park 10.12% and the lowest being Long Drive at 1.05%.

Devonshire Lodge is the only car park with more than 10% of payments being by cash. The average across all car parks is 4.0%.

Similar variation is seen with on-street parking payments, with the highest percentage of cash transactions being at one location with 21.57% of all transactions being by cash.

However, at more than half of the Council's on-street pay and display locations, less than 10% of payments are made with cash the overall average percentage of cash payments is 7.99%.

The PaybyPhone service contracted by the Council allows motorists to pay by cash in shops that offer the PayPoint service. Using the data on volumes of cash

payments made at our parking locations the Council will be able to identify locations where higher volumes of cash payments are made and assess the availability of local PayPoint shops to determine if mitigation measures are required for the removal of the pay and display machines. An assessment will be completed for each road with on-street parking bays and each car park.

## Consultation

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

Please tick ✓      NO       YES ✓

This proposed change was part of the public consultation on the overall budget for the Council, published in December 2025. As part of the consultation on the Council's budget plans, the Council's select committees also reviewed the proposals. Feedback from the consultation and committee review of budget proposals will be considered when developing the formal decision paper for this proposed service change.

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

### Legal context

The council has a public duty to pay due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations (Equality Act 2010).

### Budget context

The Council needs to reduce costs to address budget pressures. The proposal to remove the option to pay for parking at pay and display machines will result in cost savings, enabling the Council to sustain other services it needs to provide. Alternative options will be made available to pay for parking through PaybyPhone or in PayPoint shops only.

The change being assessed is necessitated by the financial position faced by the Council and the outcome to be achieved is cost reduction. The removal of the option to pay for parking on a pay and display machine could save the Council in the region of £190k p.a. and enable changes to be made to parking tariffs that may not be possible through pay and display machines.

## 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** impacts (actual or potential):

Equality Group	Impact on this group and actions you need to take
Older people	<p>Generally, research shows that older people are less likely to carry and regularly use mobile phones than the population as a whole. Where they own a smart phone, they are also less likely as a cohort to use it to go online.</p> <p>This proposal will have a greater impact on people who do not have access to a mobile phone or use a smart phone to go online since they will not have the ability to pay for parking by cash or card in Council parking spaces.</p> <p>The change therefore may have a disproportionately negative impact on older people.</p> <p>To mitigate against this, information will be provided in advance of the change, by way of general communications and signage in car parks and near on-street parking bays to make sure that drivers are aware that the change will be made before it is implemented.</p> <p>In many locations, payment by cash will still be possible where there is a PayPoint shop near the parking space concerned.</p> <p>If implemented, the impact of the proposal will be monitored.</p>

C.2) Describe any **POSITIVE** impacts

None identified.

**D) Conclusions**

Whilst the changes to the parking service offered to motorists in the borough will have an impact on older people, the number who are likely to be significantly disadvantaged due to their protected characteristic is expected to be very small and limited to those who drive but do not have a mobile phone.

The ability to pay for parking using cash via PayPoint shops further limits the potential negative impact of this potential change.

The Council is not the only provider of car parking spaces in many areas of the

borough. The changes will not affect options for residents permits in restricted parking areas.

This change is considered necessary in the content of the budget pressures facing the council and the consequential need to reduce the cost of service provision.

However, this change will be kept under review by the Parking Services team who will use data to assess areas where the proportion of cash payments is higher and to seek to identify mitigation consider feedback from residents either during the consultation process or subsequently to determine whether mitigation measures are required.

**Signed and dated:**



27/01/2026

**Name and position:** Richard Webb; Director of Community Safety and Enforcement



# Equality and Human Rights Impact Assessment

## PROPOSAL REF 2026/27 165: DIGITAL LIBRARY PLAN PILOT

### STEP 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

Digital Library Plan Pilot

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

Corporate Director, Residents Services

Date assessment completed and approved by accountable person

26/01/26

Names and job titles of people carrying out the assessment

Dan Kennedy, Corporate Director, Residents Services

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

Introducing new digital technology which will allow residents using the library to self-serve and increase access to digital information, without the need for assistance from the library service staff team. This will ensure residents can use the service at their own convenience and ensure the staffing resource available is deployed to ensure

the smooth running of services.

The proposal is to introduce new self-service technology into 6 libraries as a pilot, working with residents and library staff, to test the benefits of the new technology. A decision on the 6 libraries to receive the new technology has not been made at this point (January 2026).

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

The data available at this point is based on the population profile for the Borough, which is available published on the Council's website.

<https://pre.hillingdon.gov.uk/downloads/file/739/section-2-summary>

<https://pre.hillingdon.gov.uk/downloads/file/741/section-3-population>

<https://pre.hillingdon.gov.uk/downloads/file/744/section-4-health-conditions-and-mortality>

An updated assessment will be prepared using data on residents when a decision has been made on the six libraries to be included in the pilot.

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

<b>Stakeholders</b>	<b>Interest</b>
Hillingdon Residents	<ul style="list-style-type: none"><li>• To ensure there is continued access to library services in a way that is convenient for residents.</li><li>• To ensure that no groups who share equality characteristics are disproportionately negatively affected by the proposals.</li><li>• Ensure value for money and an improved service for residents.</li></ul>
Corporate Director, Residents Services	<ul style="list-style-type: none"><li>• To ensure the sufficiency of library services in line with Public Libraries and Museums Act 1964.</li><li>• To ensure the library service is cost effective and efficiently run.</li><li>• To ensure that no groups who share equality characteristics are disproportionately negatively affected by the</li></ul>

	proposals.
Leader of the Council and Council Cabinet	<ul style="list-style-type: none"> <li>• To ensure the sufficiency of library services in line with Public Libraries and Museums Act 1964.</li> <li>• To ensure the library service is cost effective and efficiently run.</li> <li>• To ensure that no groups who share equality characteristics are disproportionately negatively affected by the proposals.</li> </ul>

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

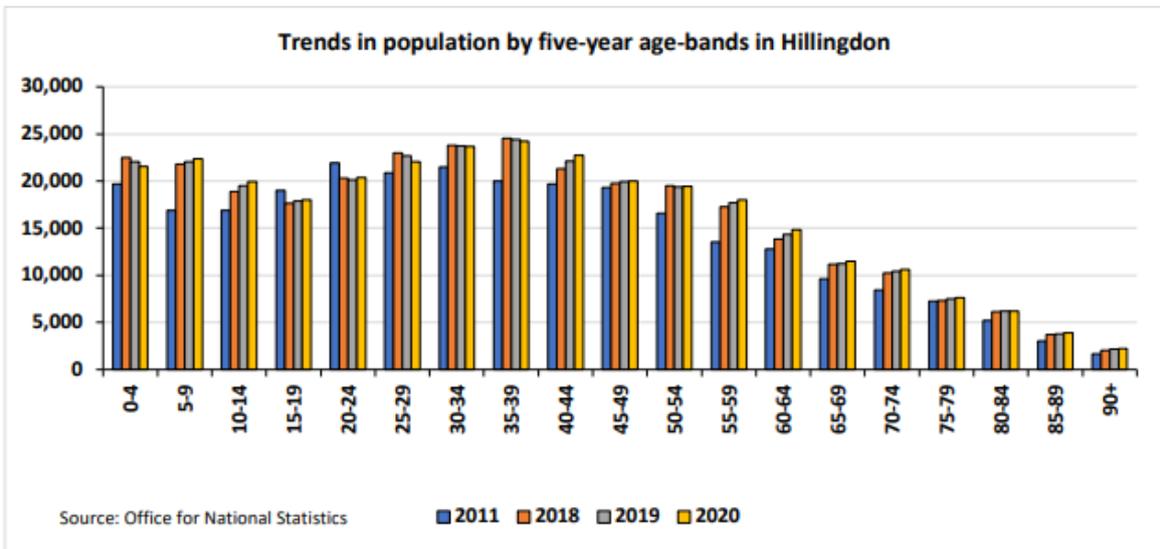
Age	✓	Sex	✓
Disability	✓	Sexual Orientation	
Gender reassignment		Socio-economic status	
Marriage or civil partnership		Carers	
Pregnancy or maternity	✓	Community Cohesion	✓
Race/Ethnicity	✓	Community Safety	
Religion or belief		Human Rights	

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

B.1) Consideration of information and data - what have you got and what is it telling you?

From the published population data for Hillingdon (2022) which uses Census 2021 data, Hillingdon's population is characterised by a younger, but ageing population when compared to many London Boroughs.

From the graph below, it can be seen that the number of residents in the 60+ age bands are increasing.



For older residents using the library service, there may be a higher rate of concern about using the self-service digital technology and accessing digital information compared to other age groups. To support all residents using the library service, there will be support available to assist residents using the technology in the pilot phase, which will be subject to review.

Rates of ill health and disability in Hillingdon’s population typically match the London averages. There may be concerns raised by some residents with ill health or disabilities that the new digital technology is difficult to use or access.

Overall, it is not anticipated there will be a negative impact on residents seeking to use the library service during the pilot phase given the support that will be available to assist residents and the wider benefits that the new technology brings, such as convenience and ease with which to access library materials.

## Consultation

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

Please tick  NO  YES

Engagement will be undertaken with residents as part of the pilot of new self-service technology into six libraries across the Borough.

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

#### Legal context

The council has a public duty to pay due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations (Equality Act 2010)

#### Financial context

The digital library pilot stage will deliver a savings target of £706k, over two years, from 2026/27.

The digital plan pilot for the library service is consistent with the five-year Library Service Strategy for Hillingdon, which sets out 5 ambitions:

1. Reading, Literacy and Culture
2. Health and Wellbeing
3. Improving digital services and inclusion
4. Information and learning
5. Sustainable service delivery

The fifth of these five ambitions link directly to the need for sound financial management as explained above. Ambitions 1-4 aim to support residents with access and provision of services, initiatives and promotions that enrich, empower and inform those who live, work or study in the borough. This includes ambition 3, to improve digital services and inclusion.

### 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** impacts (actual or potential):

Equality Group	Impact on this group and actions you need to take
Older People	<p>The introduction of new self-service technology and digital materials in the library service could mean some older residents have difficulty or are not confident in accessing the library service and therefore lead to a negative experience.</p> <p>In order to mitigate against this negative impact, support will be available to residents during the pilot phase in rolling out new technology to assist them.</p> <p>We will carry out regular engagement activities with residents to ensure everyone is fully informed of the changes and supported in the transition pilot phase.</p>
Residents with disabilities	<p>The introduction of new self-service technology and digital materials in the library service could mean some residents with disabilities have difficulty accessing the library service and therefore lead to a negative experience.</p> <p>In order to mitigate against this negative impact, support will be available to residents during the pilot phase in rolling out new technology to assist them.</p> <p>We will carry out regular engagement activities with residents to ensure everyone is fully informed of the changes and supported in the transition pilot phase.</p>

C.2) Describe any **POSITIVE** impacts

Equality Group	Impact on this group and actions you need to take
All residents	<p>The proposed changes to the way the library service is delivered with new technology and digital options increases access to library materials and will offer a more convenient service to best meet residents' needs.</p>

## D) Conclusions

Whilst it is recognised that the proposed changes to service delivery in the library service, offering residents self-service options and a wider range of digital options, may have an impact residents who feel less confident and able to use the technology, the changes proposed are intended to have a positive impact in developing opportunities for residents to have more control over their service experience, in a way which is cost effective and convenient.

Support will be provided to all service users during transition.

When the detail of delivery plan is agreed, including confirmation of the 6 libraries to be included in the pilot, this assessment will be reviewed and updated.

**Signed and dated:...**  29 January 2026

**Name and position:** Dan Kennedy, Corporate Director, Residents Services.



HILLINGDON  
LONDON

✓

## Equality and Human Rights Impact Assessment

**PROPOSAL REFS 2026/27 082, 084, 085, 086, 087, 089, 143, 145,  
147, 148, 189, 190,191, 193, 214, 259 – HOUSING NEEDS**

### **STEP 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 ✓

#### **Housing Needs and Homelessness MTFs Action Plan 2026/27 to 2028/29**

Homelessness and Temporary Accommodation has increased in Hillingdon – leading to increasing budgetary challenges.

The MTFs Action Plan aims to manage and contain the budget challenges. The Action Plan contains four workstreams – set out below:

#### **Workstream 1: Increase prevention and reduce new temporary accommodation placements**

- Reduce placements of mainstream demand from 20% to 10% (general fund homeless), Chagos islands arrivals, and rough sleepers.

#### **Workstream 2: Increase access to alternative housing options**

- a) Rapid rehousing – 24 placements out of London
- b) PRS Accommodation 1 – 63 move on (Chagos Pathway)
- c) PRS Accommodation 2 – 90 (Local Housing Company)
- d) PRS Accommodation 3 – 34 additional mainstream PRS move on.
- e) Supported Housing – Rough Sleeper Pathway – 33
- f) Housing for Vulnerable Singles – 15 single homelessness pathway

#### **Workstream 3: Reduce cost of temporary accommodation**

- a) Additional Leasing Scheme 1 – 87 unit (Frays Water)

- b) Additional Leasing Scheme 2 – 17 units (Arora)
- c) Additional Leases (full repair and insure) – 40 units

**Workstream 4: Increase move-on into social housing**

- a) Annual Lettings Plan to allocate 110 additional social homes to households in B&B, 329 in total
- b) Shortlife housing - additional 144, 155 in total
- g) Reduced Cost Temporary Accommodation 1 – 23 placements converted low demand social to Shortlife TA, for use by homeless households

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

Adam Stephenson, AD Housing Needs and Homelessness

Date assessment completed and approved by accountable person

27/01/2026

Names and job titles of people carrying out the assessment

Adam Stephenson, AD Housing Needs and Homelessness  
Lorrita Johnson, Housing Needs Modernisation Programme Manager  
Debbie Weller, Head of Housing Strategy and Policy

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

Plan to deliver MTFs action plan which aims to produce general fund savings and reduce reliance on high cost temporary accommodation.

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

Service users – housing needs and homeless households, mainly those in temporary accommodation.

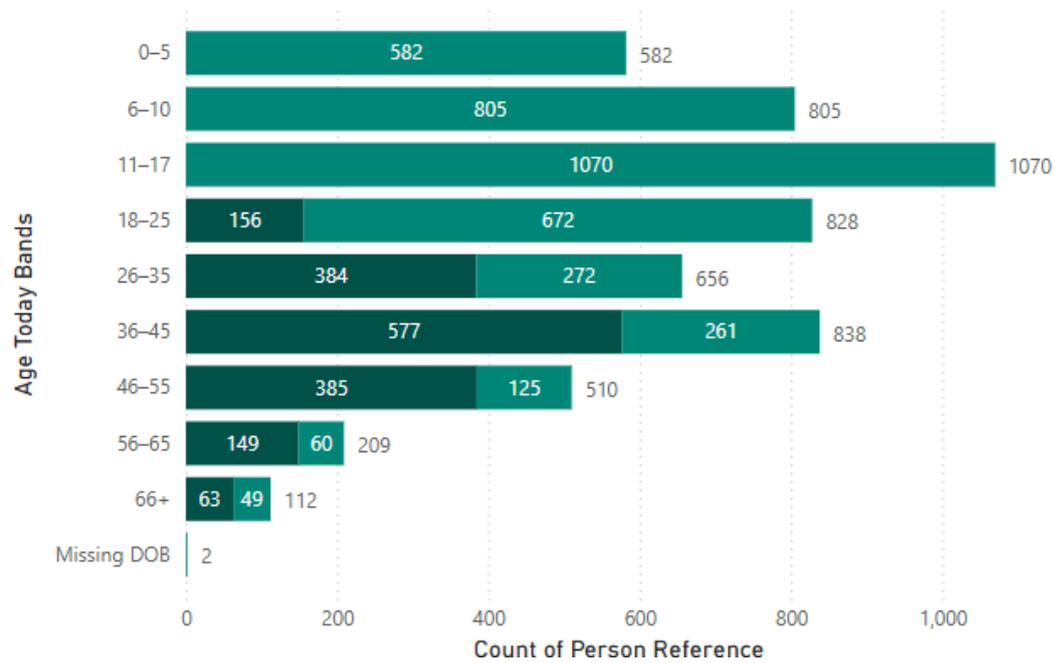
**Temporary Accommodation**

Based on NEC data on 27/01/2026 there are 5,471 homeless people in 1,636 households in temporary accommodation.

The **age profile** of these people is shown below with the main tenant separately identified:

### Age Today

Main Tenant Indicator ● Main Tenant ● Other

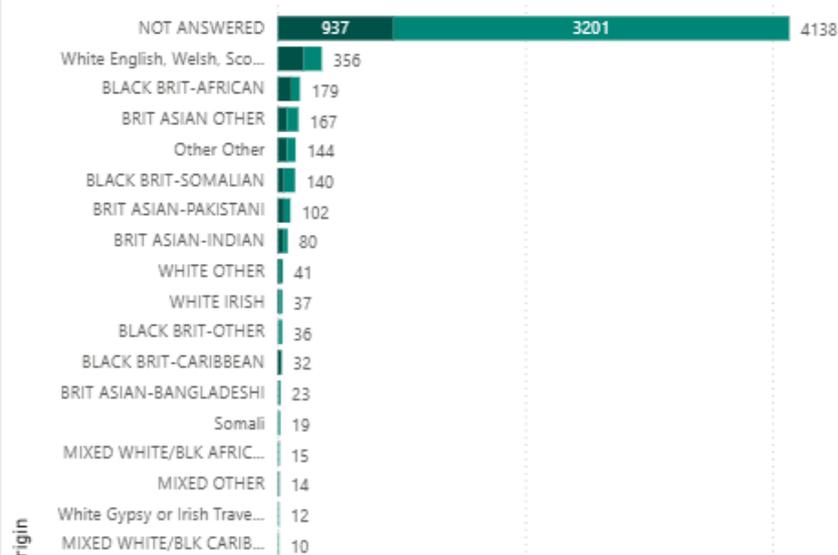


The highest numbers of households are those with main tenants in the mid age ranges, particularly 36-45, with lower numbers at either end of the age spectrum.

The **ethnicity profile** is shown below (those with less than 10 people are not shown):

### Ethnic Origin

Main Tenant Indicator ● Main Tenant ● Other



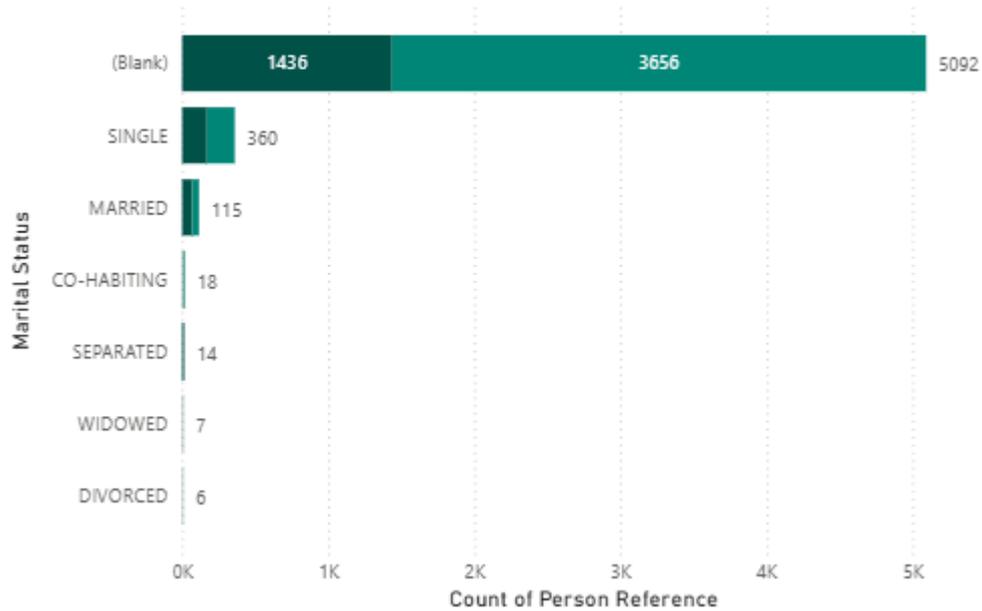
Unfortunately, this data is missing in most instances. Where its is shown the ethnicity is mainly white or black groups, with a lower number in Asian groups and fewer again in other categories.

There is limited data available related to **marital status**. Where this is shown there

are considerably more single than married or cohabiting.

### Marital Status

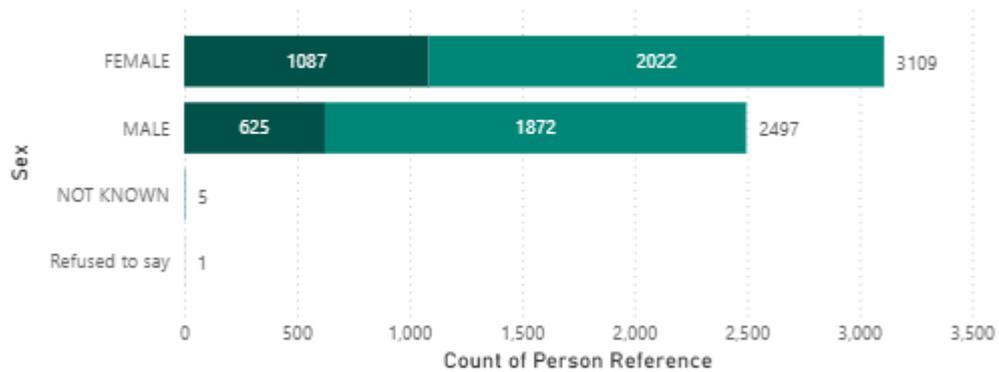
Main Tenant Indicator ● Main Tenant ● Other



**Sex** – almost two thirds of households are headed by a female tenant

### Sex

Main Tenant Indicator ● Main Tenant ● Other



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

<b>Stakeholders</b>	<b>Interest</b>
Council Cabinet and Leader Corporate Management Team, and Assistant Director Housing Needs and Homelessness	<ul style="list-style-type: none"> <li>• Transparent and fair delivery of homelessness services</li> <li>• Delivering necessary general fund savings across homelessness services</li> <li>• Ensuring that the Council is meeting its duties under the Housing Act 1996 (as amended), Homelessness Reduction Act 2017, Statutory Homelessness Guidance and Statutory Housing Allocations Guidance, Localism Act 2011 and Equalities Act 2010.</li> </ul>
Homeless households	<ul style="list-style-type: none"> <li>• Likely nature of and time spent in temporary accommodation</li> <li>• Availability and nature of rehousing options</li> </ul>

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

Age	✓	Sex	✓
Disability		Sexual Orientation	
Gender reassignment		Socio-economic status	
Marriage or civil partnership	✓	Carers	
Pregnancy or maternity		Community Cohesion	
Race/Ethnicity	✓	Community Safety	
Religion or belief		Human Rights	

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

B.1) Consideration of information and data - what have you got and what is it telling you?

The MTFs proposals will increase the availability of settled rehousing options in both the social and private rented sector and will provide temporary accommodation options that will reduce reliance on nightly paid accommodation.

This will benefit all homeless applicants requiring accommodation.

**Consultation**

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

Please tick ✓ NO ✓ YES

Consultation has not been carried out specifically in relation to the MTFs measures, however we currently have a draft Homelessness Strategy which is closely aligned

with the MTFs proposals. This strategy is currently being consulted on and a wide range of staff and partners have been involved in developing the strategy in the first instance and have influenced the priorities and actions in the draft document.

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

Legal context

The council has a public duty to pay due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations (Equality Act 2010)

Financial context - standard text

Since 2010, the council has driven a transformation programme across all services aimed at reducing costs and improving efficiency to ensure that in an environment of increased expenditure from population growth and inflationary uplifts we continue to deliver high quality services that put residents first.

The council continues to prioritise the delivery of its rigorous savings programme maintaining high standards of resident services, however, the latest projections indicate that further savings of £34m will be required during 2025-26 to bridge the budget gap as a result of reducing government funding and the increasing cost of service delivery.

**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** impacts (actual or potential):

<b>Equality Group</b>	<b>Impact on this group and actions you need to take</b>
<b>Age</b>	Mid age range families are more prevalent amongst homeless households with less at either end of the age spectrum. There is no bed size breakdown provided for the MTFs proposals, but it is generally easier to secure smaller bedsize accommodations. Efforts should be made to secure large properties where possible to minimise the potential negative impact on larger families.
<b>Marriage or civil partnership</b>	There is no reason for these proposals to impact on this equality group aside from a possible correlation with age.
<b>Sex</b>	There are more households headed by women than men among

	homeless households. The additional supply will however benefit both sexes.
<b>Ethnicity</b>	The increased supply will benefit homeless households of all ethnicities.

C.2) Describe any **POSITIVE** impacts

<b>Equality Group</b>	<b>Impact on this group and actions you need to take</b>
Age	See C1

## **D) Conclusions**

The measures are unlikely to impact disproportionately other than potentially favouring those at either end of the age spectrum. It should however be noted that housing supply already favours these groups and the proposals will simply increase overall supply. This can be mitigated through efforts to prioritise acquiring family homes where possible.

**Signed and dated:** *Adam Stephenson*

**Name and position:** Adam Stephenson, AD Housing Needs and Homelessness



# Equality and Human Rights Impact Assessment

## PROPOSAL REF 2026/27 212: COUNCIL TAX REDUCTION SCHEME

### STEP 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

Hillingdon Council's Working Age Council Tax Reduction Scheme changed to a banding scheme in April 2020. Since then, it has been updated in 2023 and 2025 with various changes such as the weekly non-dependent deduction and the minimum weekly award amount.

The banding scheme has helped to simplify the assessment of Council Tax Reduction and allows for minimal income changes that do not necessarily change the award of Council Tax Reduction. This creates less uncertainty over what the Council Taxpayer must pay, and fewer bills with amended instalment amounts.

There are 3 proposals to change the banding scheme from 01/04/2026 which are intended in a balanced and proportionate way to help reduce the overall cost of the scheme as the continued increase in demand has put immense pressure on an already limited budget.

The proposals are:

1. Apply the standard £10.00 non-dependant deduction across all schemes including the vulnerable scheme (unless the non-dependant is a student when no deduction is taken)
2. Reduce the maximum award from 80% to 75% across the vulnerable scheme as part of our phasing in of aligning the 2 schemes.
3. Increase the non-dependant deduction from £10 to £12 per week.

Those eligible under the 'vulnerable scheme' are in receipt of a disability benefit such as Personal Independence Payment (PIP), Disability Living Allowance (DLA) or registered blind.

This assessment considers the proposed changes to the Council Tax Reduction scheme from an equality and human rights impact perspective.

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

Steve Muldoon, Corporate Director of Finance

Date assessment completed and approved by accountable person

06/01/26

Names and job titles of people carrying out the assessment

Tiffany Boreham, Head of Revenues and Benefits  
Vicky Trott, Inclusion and Wellbeing Manager

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

Proposed reforms of the scheme are intended to meet two policy objectives, in the context of competing demands on finite funding available to support local services:

1. Aligning the vulnerable scheme with the standard scheme, and;
2. Reducing the overall cost of the scheme.

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

Those of working age currently in receipt of Council Tax Reduction could be impacted by any changes to the scheme.

Our current caseload is 15,976 which includes 10,947 working age households. Our pensioner caseload is protected and will not be affected by any of these changes.

Working age caseload equalities data

Sex

Male	3548	32%
Female	7399	68%
Total	10947	100%

68% of the claimants within the working age scheme are female.

### Ethnicity

Not completed/Any other	7027	64.2%
White British	2300	21%
European other	233	2.1%
Asian and White	27	0.2%
Black African and White	1	0.01%
Black Caribbean	51	0.5%
Black Caribbean and White	13	0.1%
Black African	238	2.2%
Black other	124	1.1%
Irish	85	0.8%
Indian	89	0.8%
Pakistani	71	0.6%
Bangladeshi	30	0.3%
Chinese	8	0.07%
Asian or Asian British: Bangladeshi	31	0.3%
Asian or Asian British: Indian	107	1%
Asian or Asian British: Pakistani	93	0.9%
Asian or British: Any other Background	127	1.2%
Black-Black British: African	222	2%
Black-Black British: Caribbean	67	0.6%
Travellers	3	0.02%
Total	10947	100%

We do not have ethnicity data for over half of the working age caseload as this information has not been completed on the form or the customer has selected 'any other group' which is not an ethnicity.

This is something we are looking to improve, as based on current data we are unable to properly determine whether the proposed changes will have an impact on a particular ethnicity or not.

### Disability

Disabled	6476	59%
Not disabled	4471	41%

Total	10947	100%
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Over half of the customers within our working age scheme are disabled.

We do not hold information regarding other protected characteristics.

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

<b>Stakeholders</b>	<b>Interest</b>
Hillingdon residents	To ensure the council has a robust, transparent and fair Council Tax Reduction scheme. That the Council Tax Reduction scheme delivers value for money. To ensure that residents who need financial support have access to the scheme.
Corporate Director of Finance	To ensure the council has a robust, transparent and fair Council Tax Reduction scheme. That the Council Tax Reduction scheme delivers value for money. To ensure that residents who need financial support have access to the scheme.
Cabinet Member for Finance and Transformation	To ensure the council has a robust, transparent and fair Council Tax Reduction scheme. That the Council Tax Reduction scheme delivers value for money. To ensure that residents who need financial support have access to the scheme.
Council Cabinet and Leader of the Council	To ensure the council has a robust, transparent and fair Council Tax Reduction scheme. That the Council Tax Reduction scheme delivers value for money. To ensure that residents who need financial support have access to the scheme.
Voluntary and Third Sector partners	To ensure the council has a robust, transparent and fair Council Tax Reduction scheme.

	<p>That the Council Tax Reduction scheme delivers value for money. To ensure that residents who need financial support have access to the scheme.</p>
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A.4) Which protected characteristics or community issues are relevant to the assessment? ✓ in the box.

Age	✓	Sex	✓
Disability	✓	Sexual Orientation	
Gender reassignment		Socio-economic status	
Marriage or civil partnership		Carers	
Pregnancy or maternity		Community Cohesion	
Race/Ethnicity	✓	Community Safety	
Religion or belief		Human Rights	

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

B.1) Consideration of information and data - what have you got and what is it telling you?

The data presented in this assessment is of the claimant rather than of the household. We acknowledge that the changes may have an impact on the household, but it is not possible to determine what those impacts may be.

We understand that women are more likely to claim benefits and more likely to be in a single parent household. This may potentially have an impact on their income and socio-economic status.

We acknowledge that in the absence of 64% of data for ethnicity, it is not possible to determine any disproportionate impacts of the proposals based on those grounds.

The impact of each of the proposals has been assessed using the data which is available.

Proposal 1 - Apply the standard £10.00 non-dependant deduction across all schemes including the vulnerable scheme (unless the non-dependant is a student when no deduction is taken)

This proposal would have a negative impact on the households where someone has a disability **and** a non-dependant living in the property where no deduction is

currently being taken. A deduction would be applied to 2080 non dependants living in households considered vulnerable under the CTR scheme. This proposal may therefore have a disproportionately negative impact on this group.

Proposal 2 - Reduce the maximum award from 80% to 75% across the vulnerable scheme as part of our phasing in of aligning the 2 schemes.

This proposal would have a negative impact on the 6476 households where someone has a disability which equates to 59% of our caseload.

Of those claimants who have a disability:

<b>Male</b>	<b>2166</b>	<b>33%</b>
<b>Female</b>	<b>4310</b>	<b>67%</b>
<b>Total</b>	<b>6476</b>	<b>100%</b>

The percentage of females with a disability is in line with the proportion of females in the scheme.

This proposal may therefore have a disproportionately negative impact on women with a disability.

Proposal 3 - Increase the non-dependant deduction from £10 to £12 per week

This proposal would have an impact on the vulnerable households where no deduction is currently being taken and the households where a deduction is currently being taken at £10.00 per week.

Of those 1398 claimants:

<b>Male</b>	<b>431</b>	<b>31%</b>
<b>Female</b>	<b>967</b>	<b>69%</b>
<b>Total</b>	<b>1398</b>	<b>100%</b>

This proposal may therefore have a disproportionately negative impact on female claimants specifically those with a disability.

## Consultation

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

Please tick  NO  YES

The Council Tax Reduction consultation went live on 21/10/25 for 6 weeks and closed at midnight on 01/12/25.

During the 6 weeks we received 26 responses to our proposals.

To promote the consultation, we contacted CAB so that they could discuss the consultation with their customers. We also put a banner on the Revenues and Benefits webpages with a link to the consultation and used social media to increase awareness.

The Capita contact centre advertised the consultation through their initial greeting on the phone line and the customer advisors promoted it when speaking to residents.

The GLA were also sent details of the consultation.

#### Details of respondents

Out of the 26 responses 18 were from females, 4 were from males and 4 preferred not to state their sex.

<b>Sex</b>	
Male	4
Female	18
Prefer not to say	4

The majority of responses were from people over 45 years of age

<b>Age range</b>	
25-34	5
35-44	0
45-54	6
55-64	6
65+	2
Prefer not to say	7

Most of the responses were from within Hillingdon with only 1 being left blank

<b>Postcode</b>	
HA4	7
UB10	7
UB3	1
UB4	2
UB7	3
UB8	4
UB9	1
Blank	1

Out of the 26 responses 13 confirmed they had a disability.

<b>Disability Yes/No</b>	
Yes	11

No	12
Prefer not to say	3

The majority of respondents were from a white group or background

<b>Ethnicity group or background</b>	
Mixed or multiple ethnic group or background	2
Prefer not to say	8
White group or background	16

Only 9 customers that responded to the consultation confirmed they were in receipt of Council Tax Reduction.

<b>CTR Yes/No</b>	
Yes	9
No	17

The majority of responses were from customers who did not have a non-dependant living with them

<b>Non-dependant Yes/No</b>	
Yes	6
No	19
Blank	1

#### Responses to each Proposal

The 3 proposals that we consulted on were to

1. Apply the standard £10.00 non-dependant deduction across all schemes including the vulnerable scheme (unless the non-dependant is a student when no deduction is taken)
2. Reduce the maximum award from 80% to 75% across the vulnerable scheme as part of our phasing in of aligning the 2 schemes.
3. Increase the non-dependant deduction from £10 to £12 per week.

**Table 1 - Breakdown of responses**

<b>Response</b>	<b>Strongly agree</b>	<b>Agree</b>	<b>Neither agree or disagree</b>	<b>Disagree</b>	<b>Strongly disagree</b>	<b>Don't know</b>	<b>Total</b>
Apply the standard £10.00 non dep deduction to the vulnerable group	3	3	3	5	10	2	26
Align the vulnerable	5	3	2	3	11	2	26

group							
Increase the non dep deduction to £12.00	3	4	1	7	9	2	26
<b>Total</b>	<b>11</b>	<b>10</b>	<b>6</b>	<b>15</b>	<b>30</b>	<b>6</b>	<b>78</b>
<b>Percentage</b>	<b>14%</b>	<b>13%</b>	<b>8%</b>	<b>19%</b>	<b>38%</b>	<b>8%</b>	<b>100%</b>

As you can see from the table the response to all proposals was mostly negative with strongly disagree and disagree being the combined highest score.

Table 2 - Breakdown of responses from the 9 residents in receipt of Council Tax Reduction

<b>Response</b>	<b>Strongly agree</b>	<b>Agree</b>	<b>Neither agree or disagree</b>	<b>Disagree</b>	<b>Strongly disagree</b>	<b>Don't know</b>	<b>Total</b>
Apply the standard £10.00 non dep deduction to the vulnerable group	1	0	2	0	5	1	9
Align the vulnerable group	1	0	0	1	6	1	9
Increase the non dep deduction to £10.00	0	0	1	2	5	1	
<b>Total</b>	<b>2</b>	<b>0</b>	<b>3</b>	<b>3</b>	<b>16</b>	<b>3</b>	<b>27</b>
<b>Percentage</b>	<b>8%</b>	<b>0</b>	<b>11%</b>	<b>11%</b>	<b>59%</b>	<b>11%</b>	<b>100%</b>

As in Table 1 the overall response to the proposals is still negative with strongly disagree being the highest score amongst the Council Tax Reduction customers.

As we only had 26 people respond to the consultation and out of those only 9 are in receipt of Council Tax Reduction the findings cannot be viewed as a clear representation of the views of the people that could be affected by these proposals.

The GLA sent an email on 01/12/25 in response to our consultation. The GLA understand that the final scheme design is a local decision for Hillingdon but considers any changes to the scheme should be based on a comprehensive analysis of household capability to pay increased obligations. They advise that changes to the scheme should be designed to safeguard against non-collection, minimise household debt and ensure optimal revenue generation. They recommend that we consider the impact on various socio- economic populations and that this could assist us with identifying household most vulnerable to

increases in household debt.

The GLA welcomes the fact we have published a detailed consultation documentation which outlines how the changes being proposed could affect working age CTR customers. They have advised that we should also make a judgement as to the forecast collection rates from those claimants and council tax payers affected by any changes to our scheme.

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

Legal context

The council has a public duty to pay due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations (Equality Act 2010)

Financial context

The Council Tax Reduction Scheme is costing more than expected due to the increase in households falling within the vulnerable band.

As the pension age scheme is governed nationally, we are unable to make any amendments to this part of the scheme.

## 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** impacts (actual or potential):

<b>Equality Group</b>	<b>Impact on this group and actions you need to take</b>
<b>People with a disability</b>	<p>Proposals 1 and 2 directly affects people who share this characteristic as the proposals aim to align the support given to disabled households with that of households where there are no disabled residents.</p> <p>Implementing proposal 3 at this time will also potentially affect the ability of this group to pay their council tax which may have an impact on debt recovery.</p> <p>We will monitor the effect of this change and any impact it has on this group.</p>

	Section 13a will be considered for those that are struggling financially because of this proposal.
<b>Women with a disability</b>	<p>Proposals 1 and 2 directly affects people who share these characteristics as the proposals aim to align the support given to disabled households with that of households where there are no disabled residents and women make up 68% of this cohort.</p> <p>Implementing proposal 3 at this time will also potentially affect the ability of this group to pay their council tax which may have an impact on debt recovery.</p> <p>We will monitor the effect of this change and any impact it has on these households.</p> <p>Section 13a will be considered for those that are struggling financially because of this proposal.</p>

C.2) Describe any **POSITIVE** impacts

<b>Equality Group</b>	<b>Impact on this group and actions you need to take</b>
<b>N/A</b>	There are no clear positive impacts

## **D) Conclusions**

Whilst the proposed changes to the scheme may have a potentially detrimental impact on various groups based on disability and sex, the changes are intended to align the scheme and to reduce the overall cost.

Due to the limitations of what is governed nationally, a variety of local scheme options were considered. These included removing the older person's discount and reviewing the income bands. Although these options were rejected at the time, they may be considered in the future.

Information regarding the changes will be published on our website and support will be available and provided to all service users when the new Council Tax Reduction is calculated.

A handwritten signature in black ink, appearing to be 'TB', enclosed within a large, hand-drawn oval. A vertical line extends downwards from the bottom center of the oval.

**Signed and dated:**

06/01/26

**Name and position:** Tiffany Boreham, Head of Revenues and Benefits