FAIRER HOUSING

City of Westminster

LICENSING OF HOUSES IN MULTIPLE OCCUPATION



Appendix 4

Equalities Impact Assessment

August 2025

SECTION 1: Programme details

Name of the policy, project, service, or strategy being assessed, and a brief overview of its aims and objectives	Renewal of Additional licensing of Houses in Multiple Occupation
Name of person completing this EqIA	**Geraint Maddocks**
Name of Director	**Mark Wiltshire**
Team	**Private Sector Housing**
Directorate	**Public Protection & Licensing**
Contact Email	**Gmaddocks@wesminster.gov.uk**
Where is this EqIA stored. (This is to ensure colleagues can pick this up in your absence.)	NA
Is this EqIA accompanying a report that is going through a formal decision process? If so which meeting, is it going to for decision?	Accompanying the public consultation and forthcoming decision on proposals to renew the additional licensing designation. Cabinet for approval.

SECTION 2: EqIA Screening – Do you need to complete a full EqIA?

Please complete the checklist below, including impact to help determine if a full EqIA is necessary.

Please see table in Section 3 for a breakdown of the protected characteristics

Question	Answer (Yes, No, Unclear)	Impact (Positive, Negative or Neutral)
Does your programme have the potential to disproportionally affect men, women or those who identify as non-binary?	No	Neutral
Does your programme have the potential to disproportionally affect people of a particular race or ethnicity? This includes refugees, asylum seekers, migrants and gypsies and travellers.	Yes	Positive
Does your programme have the potential to disproportionally affect people with a disability? Consider physical and learning disabilities and mental health conditions.	No	Positive
Does your programme have the potential to disproportionally affect people of certain sexual orientations?	No	Neutral
Does your programme have the potential to disproportionally affect people of different age groups? Consider children and elderly populations.	Yes	Positive
Does your programme have the potential to disproportionally affect those undergoing or intending to undergo the process of gender reassignment?	No	Neutral
Does your programme have the potential to disproportionally affect those due to pregnancy or maternity? The Equality Act protects women or birthing people from discrimination from when you become pregnant until your right to maternity leave ends and you return to work. If you do not have the right to maternity leave this is 2 weeks after the child is born.	No	Positive
Does your programme have the potential to disproportionally affect people of different faiths and beliefs?	No	Positive
Does your programme have the potential to disproportionally affect people on low incomes or living in poverty?	Yes	Positive
Does your programme have the potential to disproportionally affect people living in the most deprived areas of WCC? There is further detail in Section 3 below in the socioeconomic and geographical box.	Yes	Positive

If you have assessed the impact to any of the above questions to be Negative or Unclear, then you will need to complete Sections 3, 4.
If you have assessed the impact as Positive, explain the rational for this below and then go to Section 5.

This EqIA has been carried out to support the review of additional HMO licensing and proposals to renew the current designation which comes to an end on 30 August 2026. The assessment has analysed findings of the 2021 Census data, local ward profile information, English Housing Survey data and the councils tenure intelligence and Housing Stock Condition Survey to provide granularity on the composition of the Private Rented Sector in Westminster.

Additional HMO licensing covers HMOs not already licenced under mandatory licensing and includes smaller HMO with 3 or more people and HMO in purpose-built bocks.

The council recognises that although most landlords are responsible, there is a minority of rogue landlord who are found to not comply with relevant legal provisions, for example, renting properties with safety issues and overcrowding. By renewing the designation, it will allow the council to continue to improve living standards in multiple occupied properties by both supporting responsible landlords further through the setting of clear standards and providing enhanced support, whilst simultaneously targeting rogue landlords who may be exploiting tenants by providing substandard accommodation, thus helping to create a more level playing field for all rental providers and tenants.

Significant progress has been made to date ensuring that licenced properties are brought up to standard with licence conditions imposed on over 1600 properties, mostly relating to fire safety. There are close to 2500 licenced HMO properties in WCC. The total number of households at known (licenced) HMO dwellings in Westminster is 8,978. The total number of occupants at known HMO dwellings is 12,595. Data on characteristics is not available for the occupants of these properties as the council is not permitted to collect this information as part of the administrative process.

There is limited information concerning the characteristic of landlords in Westminster, with a high proportion of properties owned by corporate entities, however according to the English Private Landlords Survey 2024, the national profile of landlords includes the following characteristics:

- Landlords are as likely to be male as female, though male landlords tend to have larger portfolios than female landlords
- The median age of individual landlords is 59 years old. This is older than the general population. Almost two thirds (64%) of landlords are aged 55 or older
- The ethnicity of landlords broadly reflects that of the population as a whole, though Census 2021 data shows a smaller proportion of the wider population identified as white (81% compared to landlords at 87%)
- Around one in five (21%) of landlords had a total annual gross income of £100,000 or more
- Looking at both income from rent and income from other sources, on average landlords received nearly half (50%) of their total income from rental property

[1] English Private Landlord Survey 2024: main report - GOV.UK

SECTION 3: Assessing the Impact

<table>
<tr><th>Protected characteristic</th><th>Analysis</th><th>Impact (Positive, Negative or Neutral)</th></tr>
<tr><td>Age</td><td>
2021 census: 75% of Westminster is working age (+6 over the London average). Our last census data saw a change in under 5 year olds by -30% but an increase in 11 – 16 year olds by and 20 – 24 year olds by 5% and 11% respectively. Relative to the rest of London, Westminster has 6% more young people (16 – 34 years).
The age breakdown of our population is:

<table>
<tr><td>Age bracket</td><td>Westminster %</td></tr>
<tr><td>0 – 4 years</td><td>4%</td></tr>
<tr><td>5 – 9</td><td>4%</td></tr>
<tr><td>10 – 15</td><td>5%</td></tr>
<tr><td>16 – 24</td><td>13.9%</td></tr>
<tr><td>25 – 34</td><td>21.6%</td></tr>
<tr><td>35 – 64</td><td>37.4%</td></tr>
<tr><td>65+</td><td>12%</td></tr>
</table>

How many people will be affected

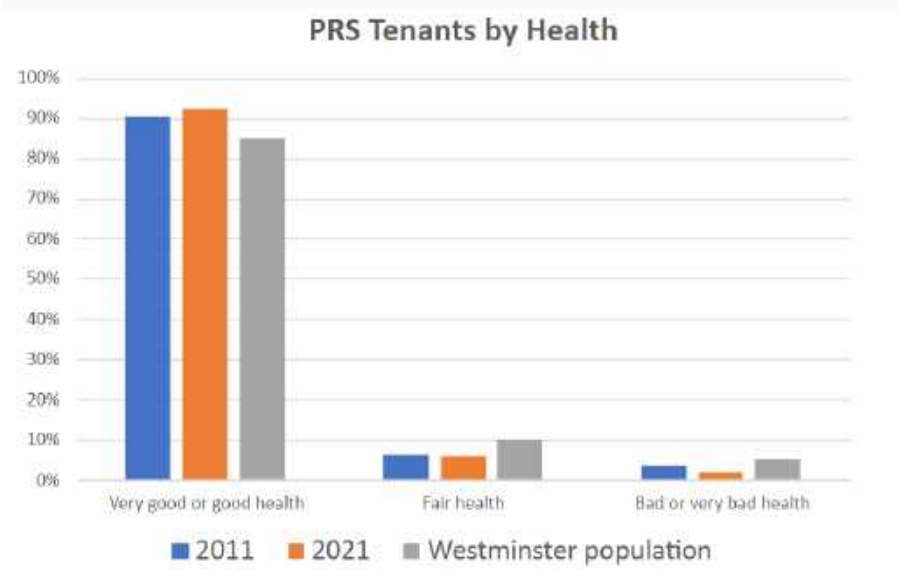
The ONS Census 2021 population age profile estimates for Westminster show that 12.1% of residents are aged 65 or older; this is compared to 18.6% nationally. Within the PRS, there is a larger proportion of the 25-44yrs age group occupying the private rented sector (city survey). The PRS nationally shows a younger demographic with the most common age group within the private rented sector was those 25 to 34.
Evidence from the English housing survey 2021 suggest that whilst there is less representation in older age groups. It is more likely that the length of tenancy increases with age, resulting in greater exposure to any housing hazards.

There is no specific data concerning this group when it comes to HMO’s however it is recognised that this group face a greater risk of homelessness. The scheme should ensure that all licence holders are fit and proper and offer a means to report discrimination both from landlords and hostile living environments.

Accessibility and Inclusion:
Means to contact the service and sharing of information will be in an accessible format for both tenants and landlords.

Analysis of impact:
Improving the standard of living accommodation will likely have a positive impact on all age groups. It will also have a positive impact on older people who are often more susceptible to hazards such as excess cold and falls.

The licensing of HMOs is considered to have an overall positive impact on this group and no further mitigating actions are required.
</td><td>Positive</td></tr>
</table>

Disability	2021 census: 18% of residents in the borough said they had a long-term condition or disability that limited their life in some way. With the highest proportions in Church Street (21%), Westbourne (19%), and Queen's Park (18%), these rates are three times higher than our most affluent wards. It is important to bear in mind these same wards are the most likely to have unpaid carers (8-10% of residents). These same wards have a life expectancy of 76 years, 18 years less than the most affluent wards. Data on service users/those affected: Overall there is a lower proportion of residents reporting poor health in the Private Rented Sector compared to the Westminster average.  Accessibility and Inclusion: The licensing of HMO allows the council to engage directly with landlords and tenants and support tenants that may require adaptations or assistance. Officers are able to meet with tenants through physical property inspections and identify and onward referral needs. Analysis of impact: HMO licensing is unable to take into consideration a tenant's disability or needs associated with their disability when applying standards. The effect of licensing overall however would be positive for households with disabled occupants in improving overall housing conditions. It is also expected that positive impacts will be realised by our officers adopting a whole person approach, with the ability to identify any concerns and make referrals to partners. Particularly for our more isolated private renters. It is well know that those with long term health conditions and disabilities are more susceptible to the effect of poor housing, and in particular excess cold. Officers training to adopt a whole person approach will actively identify wider referral needs. Mitigations for negative impact/actions taken for positive impact: No mitigations required	Positive

Gender reassignment	According to the 2021 Census, 0.75% of Westminster residents (around 1,329 people) reported that their gender identity is different from their sex registered at birth. This is lower than the London average of 0.91%, but higher than the England average of 0.55%. Notably, the Census question on transgender status was asked for the first time in 2021 and may have been misunderstood, particularly among residents whose first language is not English. Approximately 9.2% of Westminster's population did not answer the question, suggesting the true proportion may be higher The introduction of additional HMO licensing is intended to improve housing standards and management across the private rented sector. • There is no evidence to suggest that transgender or non-binary residents are *disproportionately* represented among HMO tenants compared with other groups. • However, LGBTQ+ people, including those who are transgender, can face housing vulnerability, discrimination, or barriers to accessing safe, secure accommodation. • There is therefore a duty to consider their needs in implementation, even if no negative or disproportionate impact is anticipated from the policy itself. Analysis of impact: There is unlikely to be any *disproportionate negative impact* on people with this protected characteristic. The licensing scheme is applied universally to HMOs and aims to improve conditions for all tenants. Mitigations for negative impact/actions taken for positive impact: There is no data or expectation that there will be any positive or negative impact on landlords or tenants.	Neutral
Marriage and civil partnership	54.4% of Westminster Adults have never been married, a 3% increase since the last census, despite this figure now including same-sex marriages. Data on service users/those affected: There are more single occupants within the private rented sector completed to the Westminster average, perhaps representative of the younger demographic. It is also notable that there are likely that private renters are less likely to have dependants however this is a trend that has decreased over the last decade. Accessibility and Inclusion: All PRS tenants and landlords within the scheme geography are included. Analysis of impact: There not likely to be a disproportionate affect on this group. Improving private rented housing conditions is likely to have a positive impact on all tenants, including those with dependants. Mitigations for negative impact/actions taken for positive impact: We have no data as to the marital status of occupants or landlords of HMOs.	Neutral

Pregnancy and maternity	General trends in census data show less births on average in Westminster over the past decade. Data on service users/those affected: There is limited data to analyse to show pregnancy rates by tenure or those on maternity leave by tenure Accessibility and Inclusion: All PRS tenants and landlords subject to HMO licensing are included Analysis of impact: Improvement of property conditions and standards in HMOs should have a positive impact on the health and wellbeing for this group ensuring occupation standards are met and issues that could affect the health of vulnerable groups are addressed promptly by landlords. Pregnancy can increase susceptibility to certain housing related issues and a HMO licensing scheme will ensure that any issues that arise are addressed promptly. Mitigations for negative impact/actions taken for positive impact: No mitigating actions are deemed to be required.	Positive
Race	In 2021, 28% of the population were 'White: British', and 25% was 'White: European or Other'. The next largest ethnic groups identified as 'Indian and Bangladeshi' (17%), 'Arab' (8%), and 'Black' (8%) and 7% of residents identifying with more than one ethnicity. When considering ethnicity and data it is important to note there can be major disparities within census groupings. For instance, Indian and Bangladeshi communities have great variance between them in outcomes but often are considered as one grouping in data. When considering ethnicity it is important to consider that 20% of Westminster households do not have an adult or child who uses English as their primary language. Besides English the most spoken languages are Arabic, French, Spanish, Italian and Portuguese. Accessibility and Inclusion: All tenants and landlords in the applicable scheme geography are covered regardless of race. The licensing scheme will apply equally to all landlords and tenants regardless of race or ethnicity. All guidance, communications, and application materials will be designed to be accessible and inclusive Analysis of impact: As Mixed and Other Ethnic Groups are disproportionately overrepresented in the PRS and therefore likely to be positively impacted by improvement standards and managements in Private Sector Housing. The assessment of landlords to be 'fit and proper people' will identify any with convictions for hate crimes of any kind, excluding these people from a position where harassment, victimisation or discrimination of any kind has the potential to be particularly harmful. The assessment of landlords should on balance reduce the number of landlords in the borough who might discriminate against people on the grounds of their race. With recent tenure intelligence identify that there is still predicted to be a proportion of unlicenced HMOs, it is possible that migrants, who may be less aware of the legal requirements are housed in unlicenced substandard accommodation. Mitigations for negative impact/actions taken for positive impact: No mitigating actions are required.	Positive

<table>
<tr>
<td>Religion or belief</td>
<td>Westminster is generally more Religious (73%) compared to London (63%) and England (53%). The most common religions are Christianity (37%) and Islam (20%).

Data on service users/those affected:
All private renters across affected wards. A significantly higher number of private renters compared to owner occupiers and affordable renters have no religion (53.5%).

The 2021 Census results for Westminster regarding religion or beliefs are shown below.

<table>
<tr><th>Religion or beliefs</th><th>Percentage (2021 Census)</th></tr>
<tr><td>No religion</td><td>25.9</td></tr>
<tr><td>Christian</td><td>37.3</td></tr>
<tr><td>Buddhist</td><td>1.3</td></tr>
<tr><td>Hindu</td><td>2.2</td></tr>
<tr><td>Jewish</td><td>2.8</td></tr>
<tr><td>Muslim</td><td>20.0</td></tr>
<tr><td>Sikh</td><td>0.3</td></tr>
<tr><td>Other religion</td><td>0.9</td></tr>
<tr><td>Not answered</td><td>9.4</td></tr>
</table>

Accessibility and Inclusion:
All tenants and landlords are covered regardless of religion.

Analysis of impact:
Statistically there is not likely to be any significant impact on a particular religion. Overcrowding is much higher for Muslim households and much lower for Hindus and those with no religion. There is likely to be a positive impact where overcrowding concerns can be addressed, particularly though ensuring properties are not let in an overcrowded condition. The assessment of landlords to be ‘fit and proper people’ will identify any with convictions for hate crimes of any kind, excluding these people from a position where harassment, victimisation or discrimination of any kind has the potential to be particularly harmful. The assessment of landlords should on balance reduce the number of landlords in the borough who might discriminate against people on the grounds of their religion.

Mitigations for negative impact/actions taken for positive impact:
No mitigating actions are required.</td>
<td>Positive</td>
</tr>
<tr>
<td>Sex</td>
<td>Data on service users/those affected:
According to the 2021 Census, Westminster’s population is approximately evenly split between men and women (52% female and 48% male). The borough has a highly mobile, diverse population, with significant numbers of students, young professionals, families, and older residents. Both men and women live in private rented housing, including HMOs.

Accessibility and Inclusion:
All tenants and landlords in the applicable scheme are covered regardless of sex.

Analysis of impact:
No disproportionate impact expected

Mitigations for negative impact/actions taken for positive impact:
No mitigating actions are required.</td>
<td>Neutral</td>
</tr>
</table>

<table>
<tr>
<td>Sexual orientation</td>
<td>2021 census information on sexual orientation is only captured for people aged 16 and above. Approximately 5% of Westminster residents identify as LGBT+, slightly higher than the London average, and almost double the national average with the West End and Soho having the highest proportion (11%). It is important to note 9% of residents do not respond to this question, thus, numbers are under-reported.

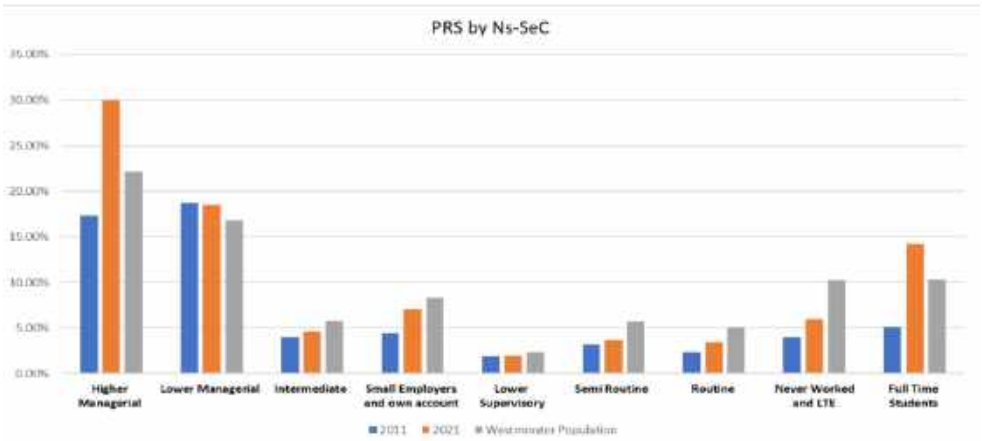
1.Data on service users/those affected:

Figure 59: Percentage of Persons by Sexual orientation and Tenure 2021 (Source: UK Census of Population)
<table><tr><th></th><th colspan="4">Tenure</th></tr><tr><th></th><th>Owner occupied</th><th>Private rent</th><th>Affordable Rented Housing</th><th>Total</th></tr><tr><td>Heterosexual</td><td>27.4%</td><td>41.6%</td><td>31.0%</td><td>100%</td></tr><tr><td>Gay or Lesbian</td><td>34.2%</td><td>49.2%</td><td>16.6%</td><td>100%</td></tr><tr><td>Bisexual</td><td>20.6%</td><td>60.2%</td><td>19.2%</td><td>100%</td></tr><tr><td>Any other sexual orientation</td><td>18.2%</td><td>53.6%</td><td>28.2%</td><td>100%</td></tr><tr><td>No answer</td><td>26.2%</td><td>45.2%</td><td>28.6%</td><td>100%</td></tr><tr><td>TOTAL</td><td>27.4%</td><td>42.6%</td><td>30.1%</td><td>100%</td></tr></table>
Figure 60: Percentage of Persons by Sexual orientation and Overcrowding 2021 (Source: UK Census of Population)
<table><tr><th></th><th colspan="6">Overcrowding</th></tr><tr><th></th><th>Under-occupied by 2+ bed rooms</th><th>Under-occupied by 1 bedroom</th><th>Correct number of rooms</th><th>Overcrowded by 1 bedroom</th><th>Overcrowded by 2+ bedrooms</th><th>Total</th></tr><tr><td>Heterosexual</td><td>12.1%</td><td>24.3%</td><td>45.7%</td><td>12.1%</td><td>5.7%</td><td>100%</td></tr><tr><td>Gay or Lesbian</td><td>10.7%</td><td>29.1%</td><td>52.4%</td><td>5.6%</td><td>2.2%</td><td>100%</td></tr><tr><td>Bisexual</td><td>7.9%</td><td>23.2%</td><td>54.5%</td><td>11.2%</td><td>3.2%</td><td>100%</td></tr><tr><td>Any other sexual orientation</td><td>12.9%</td><td>21.0%</td><td>51.0%</td><td>12.2%</td><td>2.8%</td><td>100%</td></tr><tr><td>No answer</td><td>10.6%</td><td>21.8%</td><td>47.5%</td><td>13.7%</td><td>6.4%</td><td>100%</td></tr><tr><td>TOTAL</td><td>11.9%</td><td>24.2%</td><td>46.3%</td><td>12.1%</td><td>5.6%</td><td>100%</td></tr></table>
Accessibility and Inclusion:
All tenants and landlords are covered regardless of sexual orientation.

Analysis of impact:
The assessment of landlords to be ‘fit and proper people’ will identify any with convictions for hate crimes of any kind, excluding these people from a position where harassment, victimisation or discrimination of any kind has the potential to be particularly harmful. The assessment of landlords should on balance reduce the number of landlords in the borough who might discriminate against people on the grounds of their sexual orientation.

Mitigations for negative impact/actions taken for positive impact:
No mitigating actions are required.</td>
<td>Neutral</td>
</tr>
<tr><td></td><td></td><td></td></tr>
<tr>
<td>Socio-economic and Geographical</td>
<td>Westminster has the highest economic disparity in the country The unemployment rate is 4%, same as the London figure, but higher than that of England at 2.9%. The LSOA with the highest unemployment rate is in the Westbourne ward, in this LSOA the unemployment rate is 10%, more than twice the Westminster average.

Church Street is the London ward with the highest amount of deprivation (73.4%, meanwhile Knightsbridge & Belgravia has the lowest (28.9%). Additionally, in Westminster’s most deprived wards, over 50% of children live below the UK poverty line.</td>
<td>Positive</td>
</tr>
</table>

	We know the economic capacity is the greatest determinant of health, thus a critical component to addressing inequality in the borough.  Westminster PRS has a high representation of higher managerial tenants as well as students. There is a marked difference compared to the last census in 2011. This is something for consideration as the project progresses. PSH tenants are less likely to be in receipt of housing benefits. Many lower-income households in Westminster rely on the PRS, including HMOs, due to the limited availability of social housing and high cost of owner occupation. HMOs are often used by people on lower incomes, including students, key workers, and those in precarious or lower-paid employment. Residents on lower incomes are more likely to live in HMOs, and therefore more likely to benefit from higher minimum standards, better management, and enforcement against unsafe or exploitative landlords. The cost of licensing fees will fall on landlords, who may seek to pass on costs. However, fees are set to cover only reasonable administration costs and will be applied consistently across all landlords. It is often perceived that unscrupulous landlords may attempt to evict tenants or increase rents disproportionately in response to licensing. Research across London has shown that the fee itself has not impacted tenants as the cost spread over a 5 year licence period is minimal. Any perceived negative impact is likely to be outweighed by improvements to housing and management standards.	
Care Leavers	Westminster City Council currently has 177 Looked After Children and 348 care leavers who are aged between 18-25 years. There is likely to be a positive impact on the looked after children as care leavers in Private Rented Accommodation. Particularly those under 5 who are more susceptible to housing hazards.	
Other Groups	The only military base in Westminster is Hyde Park Barracks which means that Armed Forces personnel represent a minimal impact on the housing market of the area. This would be exempt from licensing requirements. There is unlikely to be a disproportionate impact on any other group.	

SECTION 4: Action Plan

Have you identified the need to reduce or remove any negative impacts, conduct work with those from protected groups to participate where their participation is disproportionately low, or fill any data gaps? If so, complete the Action Plan below to show the work that is planned.

Issue Identified	**Planned Action**	**Lead Officer and Timeframe**
N/A	N/A	N/A

SECTION 5: Sign-off

Director/ Head of Service Name	**Mark Wiltshire**
Contact Email	**Mwiltshire@westminser.gov.uk**
Date of sign off	3.7.25
Review **It is important to consider equalities issues at every stage of the process. Remember an EqIA is a live document which means it must be regularly reviewed and updated considering new evidence or information, for example, have you now completed your consultation or has there been news on funding. Please ask your Director or Head of Service to sign-off at every review stage. You can have as many reviews as are appropriate for your work.**	
Date of 1st Review	
Name of Reviewer	
Director signature	
Date of 2nd Review	
Name of Reviewer	
Director signature	
Date of 3rd Review	
Name of Reviewer	
Director signature	