

Additional Licensing Equality Impact Assessment

Overview

This Equality Impact Assessment (EIA) considers the likely effects of the proposed borough-wide Additional Licensing Scheme for Houses in Multiple Occupation (HMOs) on people who share protected characteristics, in accordance with the Public Sector Equality Duty under section 149 of the Equality Act 2010.

The proposed scheme applies to small HMOs (3–4 occupants) that are not currently subject to mandatory licensing under the Housing Act 2004 and is intended to operate for a period of five years from 20 August 2026.

The assessment has been informed by:

- A comprehensive evidence base on HMO conditions, health and safety risk, safeguarding concerns and neighbourhood impacts
- A 12-week public consultation (December 2025 – March 2026) involving 338 respondents, including residents, landlords, tenants and partner organisations
- Targeted engagement with statutory partners, including West Mercia Police and Shropshire Fire & Rescue Service
- The Council's Better Homes for All programme and wider housing, homelessness, community safety and equality strategies

The purpose of the additional licensing scheme is to address identified local risks associated with poorly managed and unregulated HMOs, including:

- Poor housing conditions and fire safety risks
- Safeguarding and exploitation of vulnerable residents
- Anti-social behaviour and community harm
- Lack of regulatory visibility of small HMOs

This EIA recognises that HMOs disproportionately house groups who share protected characteristics and/or experience structural disadvantage.

The assessment therefore focuses on whether the proposed scheme advances equality of opportunity, eliminates discrimination, and fosters good relations, while also considering and mitigating any potential adverse impacts.

Impact Assessment – Additional Licensing

Consider how people who share protected characteristics are affected by these proposed changes in relation to the General Equality Duty;

- eliminate unlawful discrimination, harassment and victimisation
- advance equality of opportunity
- foster good relations between different groups

Protected Characteristic	Impact (X limited, XX High impact)				Who is affected?	How are they affected?	Comment
	Positive	Negative	Neutral	No data			
Age	XX	X	-	-	Young people under the age of 35 have proportionately higher representation in HMOs	<p>High Positive - improvement of HMO quality, safety and management. Less likely to experience exploitation by unscrupulous landlords/managing agents.</p> <p>Negative - potential temporary reduction of available properties during implementation whilst the regime comes into operation.</p>	The retrospective application of the licensing scheme will improve the rental landscape of Telford and Wrekin benefiting younger people (especially under the age of 35) by ensuring the properties are legally compliant.
Disability	XX	X	-	-	People with poor mental health have proportionately higher representation in HMOs.	<p>High Positive - improvement of HMO quality, safety and management will improve the living environment for those people experiencing poor mental health, which will improve health outcomes.</p>	The retrospective application of the licensing scheme will improve the rental landscape of Telford and Wrekin benefiting people with poor mental health by ensuring

						Negative - potential temporary reduction of available properties during implementation whilst the regime comes into operation.	the properties are legally compliant.
Gender	XX	X	-	-	Men have a proportionately higher representation in HMOs	High Positive - improvement of HMO quality, safety and management. Less likely to experience exploitation by unscrupulous landlords/managing agents. Negative - potential temporary reduction of available properties during implementation whilst the regime comes into operation.	The retrospective application of the licensing scheme will improve the rental landscape of Telford and Wrekin benefiting men by ensuring the properties are legally compliant.
Marriage or civil partnership	-	-	-	-	-	-	Not applicable.
Pregnancy or maternity	XX	X	-	-	Pregnant women	High Positive - improvement of HMO quality, safety and management will increase the health and wellbeing of pregnant women leading to better outcomes. Less likely to experience exploitation by unscrupulous	The retrospective application of the licensing scheme will improve the rental landscape of Telford and Wrekin benefiting pregnant women by ensuring the properties are legally compliant.

						landlords/managing agents. Negative - potential temporary reduction of available properties during implementation whilst the regime comes into operation.	
Race, nationality and ethnic origin	XX	X	-	-	Transitional temporary workers who are more likely to have a range of different nationalities and ethnicities have a proportionately higher representation in HMOs	High Positive - improvement of HMO quality, safety and management. Less likely to experience exploitation by unscrupulous landlords/managing agents. Negative - potential temporary reduction of available properties during implementation whilst the regime comes into operation.	The retrospective application of the licensing scheme will improve the rental landscape of Telford and Wrekin benefiting people from different nationalities and ethnicities by ensuring the properties are legally compliant.
Religion or belief	-	-	X	-		-	In some cases, HMOs occupied by members of religious communities are exempted from licencing.
Sexual orientation	-	-	-	X		-	No data available
Transgender status	-	-	-	X		-	No data available

Care experience	XX	X	-	-	Those leaving care may not have the supporting framework to stay in a household after the age of 18 so may transition into single room accommodation including HMOs.	High Positive - improvement of HMO quality, safety and management. Less likely to experience exploitation by unscrupulous landlords/managing agents. Negative - potential temporary reduction of available properties during implementation whilst the regime comes into operation.	The retrospective application of the licensing scheme will improve the rental landscape of Telford and Wrekin benefiting care experienced individuals, by ensuring the properties are legally compliant.
Armed Forces	XX	X	-	-	Ex-armed forces personnel have higher representation in HMOs, particularly when transitioning from service life to civilian life.	High Positive - improvement of HMO quality, safety and management. Less likely to experience exploitation by unscrupulous landlords/managing agents. Negative - potential temporary reduction of available properties during implementation whilst the regime comes into operation.	The retrospective application of the licensing scheme will improve the rental landscape of Telford and Wrekin benefiting ex armed forces personnel by ensuring the properties are legally compliant.
Deprivation	XX	X	-	-	People on low income particularly individuals in receipt of means tested benefits have higher representation in HMOs.	High Positive - improvement of HMO quality, safety and management. Less likely to experience exploitation by unscrupulous	The retrospective application of the licensing scheme will improve the rental landscape of Telford and Wrekin

						landlords/managing agents. Negative - potential temporary reduction of available properties during implementation whilst the regime comes into operation.	benefiting those experiencing higher levels of deprivation, by ensuring the properties are legally compliant.
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Evidence and data

This assessment draws on a range evidence sources including:

- **Public consultation evidence** (338 responses), including free-text analysis and written organisational submissions
- **Partner intelligence and operational evidence** from the Police, Fire & Rescue Service, supported housing providers and advice agencies
- **Census 2021 data**, supplemented by local service data and enforcement intelligence
- Casework and inspection findings from the Council's **Private Sector Housing Team**
- Evidence presented in the **Additional Licensing Evidence Base** and **Consultation Commentary**

The evidence base demonstrates consistent patterns regarding who lives in HMOs, the risks they experience, and where existing regulatory approaches fail to provide effective protection.

Consultation and engagement has taken place with stakeholders from across the borough including but not limited to;

- Landlords – both HMO and non-HMO
- Private tenants
- Social housing tenants
- Lettings agents
- Owner-occupiers
- Local housing organisations and partners
- Community groups
- Employers that may have temporary/transitional employees and employees recruited from overseas
- Town and parish councils
- Staff, including housing and planning
- Harper Adams University including Student Unions.
- General public

Evidence shows that certain groups are **over-represented in HMOs**, including:

- **Younger people**, particularly those under 35
- **People on low incomes**, including those in receipt of means-tested benefits
- **People experiencing poor mental health** (disabled people)
- **Care-experienced individuals** transitioning to independent living
- **Ex-armed forces personnel** transitioning to civilian life
- **Migrant workers and people from ethnic minority backgrounds**, including those with language barriers

These groups are more likely to rely on shared accommodation due to affordability constraints, housing transitions, or reduced access to alternative housing options.

Evidence also shows that pregnant women, whilst not over-represented in HMOs, would benefit from improved housing quality delivered by Additional Licensing.

The Council will take steps to develop further operational data to understand in more detail the impact of the scheme

Mitigation

Potential adverse impacts have been identified primarily in relation to indirect effects during implementation, rather than from the scheme itself. The Council has developed proportionate and targeted mitigation actions, informed directly by consultation feedback and partner evidence.

Mitigation of Supply and Transition Risks

- A 3-month lead-in period before enforcement begins during which landlords may apply early prior to commencement of the scheme
- A 10% early-bird licence fee discount for applications submitted in this 3 month period prior to scheme commencement
- Licences issued for a five-year period, providing certainty and stability for landlords and tenants
- Ongoing monitoring of housing supply, homelessness presentations and market behaviour, with oversight through Cabinet reporting and Scrutiny

Mitigation of Financial Impact Risks

- Licence fees set on a cost-neutral basis in accordance with the Provision of Services Regulations 2009
- Evidence reviewed shows no demonstrable link between additional licensing and disproportionate rent increases
- The Renters' Rights Act 2025 provides further protections against unfair rent increases
- Enhanced tenant advice and support to ensure residents understand their rights
- Enhanced Landlord Support Programme to provide advice, guidance and signposting to Landlords in relation to additional licensing and wider Renters Rights Act 2025 reforms

Safeguarding and Tenant Protection Mitigations

- Proactive inspection of all licensed HMOs, reducing dependence on tenant complaints
- Improved regulatory visibility enabling earlier intervention where safeguarding risks are identified
- Joint working with Police, Fire & Rescue, support agencies and community safety partners

Landlord Support and Engagement

- An enhanced Landlord Support Programme, including:
 - A dedicated Tenancy Intervention Officer
 - Access to named technical officers for licence applicants
 - Clear guidance, templates and signposting via the Council website
- Continued engagement with the Wrekin Landlord Association
- These measures aim to support compliance, sustain tenancies and reduce unintended negative impacts while maintaining robust safeguards for tenants.

Review

The Council will:

- Monitor equality impacts throughout the lifetime of the scheme
- Report outcomes through the **annual Better Homes for All Cabinet Report**
- Enable Scrutiny consideration following the first year of operation
- Review enforcement data, partner feedback and tenant outcomes to inform future decision-making

The assessment concludes that the proposed Additional Licensing Scheme is likely to advance equality of opportunity, reduce disproportionate harm, and provide enhanced protection for groups who experience elevated risk in the private rented sector, while any adverse impacts are limited, proportionate and mitigated.

This Impact assessment was completed by

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