



NORWICH City Council

Committee Name: Cabinet

Committee Date: 5 February 2025

Report Title: HMO Licensing Policy

Portfolio: Councillor Jones – Cabinet member for housing

Report from: Executive Director of Resources

Wards: All Wards

OPEN PUBLIC ITEM

Purpose

For members to consider the draft HMO Licensing Policy in respect of Houses of Multiple Occupation (HMOs) licensed under the Housing Act 2004 and to agree a public consultation.

Recommendation:

That Cabinet agree to on the draft HMO Licensing Policy.

Policy framework

The council has five corporate priorities, which are:

- A prosperous Norwich.
- A fairer Norwich.
- A climate responsive Norwich.
- A future-proof Norwich.
- An open and modern council.

This report meets the prosperous Norwich, the fairer Norwich and an open and modern council priorities.

Report details

1. A House in Multiple Occupation is commonly referred to as an HMO. There are indicator datasets showing there are about 4,212 total unique HMO addresses in Norwich, but only certain properties are required to be licensed under the national mandatory scheme.
2. An HMO is defined under sections 254 and 257 of the Housing Act 2004. An HMO can be a building or part of a building if it is:
 - a) occupied by persons who form more than one household and where those persons share (or lack) one or more basic amenity, such as a toilet, bathroom and cooking facilities

- b) a converted building containing one or more units of accommodation that do not consist entirely of self-contained flats. (There is no requirement that the occupiers share facilities).
 - c) a converted building consisting entirely of self-contained flats, where the building work undertaken in connection with the conversion did not comply with the 1991 Building Regulations and more than one third of the flats are occupied under short tenancies.
3. The Housing Act 2004 requires mandatory licensing of properties fitting certain criteria. The legislation also provides for 'additional' and 'selective' licensing, where local housing authorities may adopt other locally defined criteria for properties required to be licensed. Norwich does not operate any additional or selective licensing, only the mandatory scheme.

Which properties require licensing?

4. Part 2 of the Housing Act 2004 requires Norwich City Council as the local housing authority, to license certain HMOs in the private rented sector. Licensing was introduced in April 2006.
5. This was in response to growing national concern regarding the condition and management of the private rented sector, particularly larger HMOs. Those with 5 or more occupants and based over 3 or more floors were required to be licensed under the mandatory scheme.
6. In October 2018, the definition of an HMO requiring a licence was extended by the Secretary of State to include all HMOs with 5 or more occupants, irrespective of the number of floors of the property.
7. Licensing is intended to make sure that:
- a) A 'fit and proper' person manages HMOs.
 - b) each HMO is suitable for the number occupants living in the building.
 - c) the management of the HMO (including repairs, amenities, health and safety) is satisfactory.
 - d) high risk HMOs can be identified and targeted for improvement.
8. There is no specific requirement under the legislation for a local authority to adopt a specific policy on its approach to HMO licensing, however it is considered good practice to do so to enable the council to:
- a) Set out its approach for the benefit of operators.
 - b) Guide and reassure the public and other public authorities.
 - c) Ensure transparency.
 - d) Ensure consistency.
9. Norwich City Council has published a significant amount of information regarding HMO Licensing on the council's website and has an existing HMO Licensing Policy in place which can be found here:
https://www.norwich.gov.uk/download/downloads/id/8346/hmo_licensing_policy.pdf
10. A new draft policy has been prepared and is attached at Appendix A for members to consider. This report seeks authorisation for this draft policy to

form the basis of public consultation.

11. Once adopted a policy would normally be in force for a period of 5 years but may be reviewed at any time during that period.

What is different in the proposed policy?

12. The draft policy has updated the current practices of HMO Licensing administration and inspection of properties to align more closely with both. The policy also outlines, in more detail, the requirements of applicants to provide the Council with the information it needs to deliver its statutory functions and provide a safe environment for occupiers to live in.
13. Section 3 (Legislation) of the existing policy has been replaced by a new table for ease of reference.
14. Sections 4 and 5 (consultation and adoption and interaction with other policies) of the existing policy have been deleted. They are not required in the policy and are considered to add little value. Elements of section 5 are covered in the Equality Impact Assessment (EQiA) appended to this report at Appendix B.
15. There are new sections (sections 5 and 6) which set out HMO Licence requirements in 2 distinct parts: what is necessary and what is desirable to support an application. This makes it clearer for applicant(s) to understand and adds detail where necessary.
16. Details in the fees section (in section 4) has been made clearer, particular about staged payments and when these are due.
17. A dedicated section on the fit and proper person test has been added (section 7) to aid the understanding of the applicant(s) around how the council will assess this.
18. The section on issuing a licence has removed the need for inspections for new HMO's, prior to a licence being issued. Instead, a new risk-based approach to licensing is set out. This is due to resource implications and is considered better to direct resource to high-risk properties rather than all those seeking a new application.
19. The revised policy also removes the 1-year and 3-year licence options. This has been replaced by a recognition that the existing law allows licences to be granted only for up to 5 years but does not express any requirements about licence length beyond this. The previous approach did not address administrative burdens, and junior officers were making decisions on licence length, not based on risk.
20. Details on the statutory powers to revoke and vary licences has also been included.

Term of licence

21. The Housing Act 2004 allows for licences to be granted for up to 5 years.

Consultation

22. The legislation does not provide for any statutory consultees that must be consulted on any proposed policy. It is proposed to consult as follows:

- An open consultation via the Council website
- Existing licence holders
- Trade organisations
- Persons who appear to the authority to represent the interests of persons operating Houses of Multiple Occupation
- Persons who appear to the authority to represent the interests of persons likely to be affected by the exercise of the authorities licensing functions under the Housing Act 2004

23. The portfolio holder has been consulted and briefed on the draft policy via portfolio holder briefings with the Head of Planning and Regulatory Services.

24. Consultation will be undertaken via Norwich City Council's website and via Get Talking Norwich and directly with those identified in bullets 2-5 above.

25. The public consultation would run for 6 weeks, provisionally from 10 February 2025 following agreement to the consultation from Cabinet.

Summary

26. The latest draft policy is attached at Appendix A following a meeting of the Regulatory Committee prior to consultation. Following formal consultation, the draft policy will be amended (or not) as appropriate, in response to representations and will return to Regulatory committee for final approval before being formally adopted by the Council at Full Council.

27. The draft policy seeks to re-focus our activities regarding HMOs on improving and driving up housing standards, whilst also reducing administrative tasks.

28. Following formal adoption, the policy will remain in force for a five-year period after which it should be reviewed and formally adopted for a further five-year period, thereafter. However, the Council will reserve the right to review the policy sooner should it be required, or make such revisions to their policy, at such times as considered appropriate, following a further consultation exercise.

Implications

Financial and Resources

29. Any decision to reduce or increase resources or alternatively increase income must be made within the context of the council's stated priorities, as set out in its Corporate Plan and Budget.

30. Licensing administration and inspection of licensed HMO's should be cost neutral to the Licensing Authority. The licence fee charged may only cover the cost to the authority of providing the function - i.e., the fee must be set to cover

the costs only and not to make a profit.

31. Any extra resource required to administer the policy if implemented, would be funded by a review of the licence fees to ensure the continued cost neutrality.

Legal

32. There is no legal requirement to adopt a policy, but it is considered good practice to do so, as detailed in para. 8

Consideration	Details of any implications and proposed measures to address:
Equality and diversity	An equality and diversity impact assessment of the policy will be undertaken after the proposed consultation and any amendments applied to the policy, prior to further consideration by members.
Health, social and economic impact	<p>The statutory requirement to licence certain HMO's is intended to ensure that certain Housing standards are met in the private rented sector, particularly in relation to health, welfare and wellbeing of the occupants.</p> <p>Implementation of a policy on administration and inspection of licensed properties will underpin this requirement and ensure standards are maintained.</p>
Crime and disorder	Implementation of a policy in relation to HMO administration and inspection of licensed properties is not considered to have any implications for crime and disorder, but this will be reviewed more fully following the proposed consultation with stakeholders, including the Community Safety Partnership.
Children and adults safeguarding	<p>The statutory requirement to licence certain HMO's is intended to ensure that certain housing standards are met in the private rented sector, particularly in relation to health, welfare and wellbeing of the occupants, including adults and children.</p> <p>Implementation of a policy on administration and inspection of licensed properties will underpin this requirement and ensure standards are maintained as per the Safeguarding Policy statement.</p>

Consideration	Details of any implications and proposed measures to address:
Environmental impact	Implementation of a policy in relation to HMO administration and inspection of licensed properties will contribute on the environmental impact, but this will be reviewed more fully following the proposed consultation with stakeholders.

Risk management

Risk	Consequence	Controls required
If a policy is not implemented the Licensing Authority is not able to set out its approach to fulfilment of its statutory licensing function.	Failing to deliver a statutory service can place the Council at risk of a section 5 report needing to be issued by the monitoring officer when they believe that a proposal, decision or omission by the authority has, or is likely to, break the law.	Inconsistency in approach to administering the licensing regime, confusion with stakeholders regarding their expectations, leading to dispute from applicants and costly tribunal appeals and other damaging litigation/reputational risk

Other Options Considered

33. As previously outlined in the report the policy has updated the current practices of HMO Licensing administration and inspection of properties to align more closely with both. By outlining, in more detail, the requirements of applicants to provide the Council with information to deliver its statutory functions, drive up standards in HMO's making them fit and proper for their use and to ensure that licence applicants have all the details needed to comply with their own legal responsibilities.

Reasons for the decision/recommendation

34. Adoption of a policy on administration of this licensing regime is considered good practice for the reasons set out in the report. To ensure robust policy setting, it is imperative to consider the opinions of all stakeholders, and the recommendation is for members to authorise the public consultation of this draft policy. This will enable relevant opinions to be gathered and ensure a more informed policy to be presented to members after the consultation.

Background papers:

Appendices:

Appendix A – HMO Policy Draft for Consultation

Appendix B – Equality Impact Assessment

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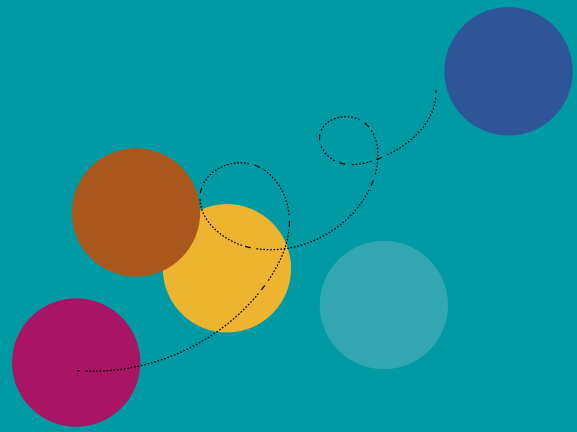
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NORWICH
City Council



Houses in Multiple Occupation (HMO)

Private Sector Housing



Title **Houses in Multiple Occupation (HMO) - Private Sector Housing.**

Owner **Sarah Ashurst. Head of Planning and Regulatory Services**

Approval level **Cabinet**

Version **2.0**

Adopted date

Review period

Review date

Relevant legislation or regulation

- **Part 2 of the Housing Act: Section 55 and (5)(c) and (6), Section 63 (3) and (7), Section 67 (5).**
- **The Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (Amendment) (England) Regulations 2012.**
- **Section 16 of the Housing and Planning Act 2016.**
- **Section 4 Licensing of Houses in Multiple Occupation (Prescribed Description) (England) Order 2018.**
- **The Regulatory Reform (Fire Safety) Order 2005.**
- **The Fire Safety (England) Regulations 2022.**

Version control			
Date	Version number	Reason	Author
3.10.2024	1.01	Small content and consistency changes	Phil Stacey
28.10.2024	1.02	Amendment to delete paragraph 19.2 relating to floor plan	Phil Stacey
05.12.24	1.03	Amendments to paragraphs 15.8,15.9 and 15.10 to correct grammar and content	Phil Stacey
09.12.24	1.04	Revision to address of First Tier Tribunal	Phil Stacey
09.12.24	2.0	Reordered	Sarah Ashurst
06.01.25	2.01	Textual amendments	Phil Stacey
16.01.25	2.02	Textual amendments	Phil Stacey



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1. Introduction

1.1. Under Part 2 of the Housing Act 2004 there are two types of licensing schemes that relate to Houses in Multiple Occupation (HMOs), the national Mandatory HMO Licensing scheme and Additional Licensing of HMOs.

1.2. Under the national Mandatory HMO Licensing scheme all properties that meet the following criteria will require a mandatory HMO licence, which is defined in section 4 Licensing of Houses in Multiple Occupation (Prescribed Description) (England) Order 2018:

- Is occupied by five or more persons.
- Is occupied by persons living in two or more separate households; and meets:
- the standard test under section 254(2) of the Act (Housing Act 2004)
 - a) it consists of one or more units of living accommodation not consisting of a self-contained flat or flats.
 - b) the living accommodation is occupied by persons who do not form a single household (see section 258).
 - c) the living accommodation is occupied by those persons as their only or main residence, or they are to be treated as so occupying it (see section 259).
 - d) their occupation of the living accommodation constitutes the only use of that accommodation.
 - e) rents are payable or other consideration is to be provided in respect of at least one of those persons' occupation of the living accommodation; and
 - f) two or more of the households who occupy the living accommodation share one or more basic amenities, or the living accommodation is lacking in one or more basic amenities.

or

- the self-contained flat test under section 254(3) of the Act (Housing Act 2004) but is not a purpose-built flat situated in a block comprising three or more self-contained flats:
 - a) it consists of a self-contained flat; and
 - b) paragraphs (b) to (f) of subsection (2) apply (reading references to the living accommodation concerned as references to the flat).

or

- the converted building test under section 254(4) of the Act (Housing Act 2004).
 - a) it is a converted building.
 - b) it contains one or more units of living accommodation that do not consist of a self-contained flat or flats (whether it also contains any such flat or flats).
 - c) the living accommodation is occupied by persons who do not form a single household (see section 258).



d) the living accommodation is occupied by those persons as their only or main residence, or they are to be treated as so occupying it (see section 259).

e) their occupation of the living accommodation constitutes the only use of that accommodation; and

f) rents are payable, or other consideration is to be provided in respect of at least one of those persons' occupation of the living accommodation.

1.3. Additional licensing of HMOs covers those HMOs that are not licensed under the mandatory scheme but where the council has used its power to designate areas of the city subject to additional licensing of HMOs.

1.4. This document sets out the structure of the scheme and the requirements that licence holders must meet, the fees, charges, and criteria the council will apply to all licences in relation to the Mandatory HMO Licensing schemes.

2. Relevant Legislation

Is my Property an HMO?	Housing Act 2004 section and schedule numbers
It will be an HMO if it is one of the following:	
A shared house lived in by people who belong to more than one family* and who share one or more facilities**.	s254(2) (The 'standard test')
A house in bedsits lived in by people who belong to more than one family and who share one or more facilities.	s254(2) (The 'standard test')
A converted building	s254(4) (The 'converted building test')
An individual flat lived in by people who belong to more than one family and who share one or more facilities.	s254(3) (The 'self-contained flat test')
A building of converted self-contained flats that do not meet 1991 Building Regulation standards. Exemptions... <ul style="list-style-type: none"> • If only two people occupy it. • If the owner occupies it – and their family if any – and one or two lodgers. 	s257



<ul style="list-style-type: none">• If a religious community occupies it.• If the occupiers have their main residence elsewhere***.• If no one in the property is required to pay rent.• If the owner or manager is a public body.• If the owner or manager is an educational institution.• A building of self-contained flats if two thirds or more of the flats are owner-occupied.• If the property is part of a guest house or hotel – unless an ‘HMO declaration’ is made.	Sch 14,7 Sch 14, 6(c) Sch 14,5 s259 s254(2)(e) Sch 14, 2 Sch 14,4 s257(2)(b) s254(2)(d) (s255(1))
Some of these HMOs must have a Licence – Which ones?	
<p>A house or flat that meets the definition of an HMO which must have a licence if.</p> <p>a) it is an HMO – see definition of HMO above, and</p> <p>b) it is occupied by five people or more.</p> <p>Exemptions:</p> <ul style="list-style-type: none">• If the whole property is a purpose-built block of three or more self-contained flats only.	Regulations made under s55



<ul style="list-style-type: none">HMOs managed by The Local Housing Authority, a Registered Housing Provider, the Police, the Fire and Rescue Authority and the National Health Service	
*Family – husband, wife, co-habitee, child, stepchild, foster-child, grandchild, parent, step-parent, foster-parent, grandparent, brother, half-brother, sister, half-sister, aunt, uncle, niece, nephew, cousin.	s258
** Facilities – basic amenities: wc; wash hand basin, shower, bath; cooking facilities.	s254(8)
*** Accommodation used by full-time students while they are studying is taken to be their main residence.	s259(2)(a)



3. HMO licensing in Norwich

3.1. The council has a responsibility under Section 55 of the Housing Act 2004 to secure the licensing of all mandatory HMOs and has been implementing its scheme in response to this duty since 2006.

3.2. The council does not currently undertake any additional licensing but reserves the right to consider implementation of a scheme of additional licensing at any point in the future. This would be subject to further consultation.

3.3. The HMO Licensing scheme in operation in Norwich therefore covers only mandatory licensable HMOs and all licence applications are to be accompanied with a fee determined by the council. Once a licence is issued it is not transferable to another person or property.

3.4. The council has exercised its powers to charge under Section 63(3) and (7) of the Housing Act 2004 and does so considering the Provision of Services Regulations 2009, which themselves implement the EU Services Directive.

3.5. Under Part 2 of the Housing Act 2004, an HMO is required to be licensed unless:

- a temporary exemption notice is in force in relation to it under section 62, or
- an interim or final management order is in force in relation to it under Chapter 1 of Part 4.

3.6. The council must take all reasonable steps to ensure that applications for licences are made to them in respect of HMOs in their area which are required to be licensed under this Part but are not.

3.7 All communications, including legal matters, will be handled via email unless you specify otherwise. Applications must be made via digital means and in a format set out by the Council. Where this is not possible, alternate ways of applying can be considered on a case-by-case basis.

4. HMO Licence Requirements

Licence Fees

4.1 Section 63 of the Housing Act 2004 permits the council to require any application for a licence under Part 2 to be accompanied by a licence fee and that this fee may properly cover all costs incurred by the council in carrying out its functions.

4.2 Norwich City Councils fee structure follows the Provision of Services Regulations 2009 and is applied to property licensing fees and the processes involved in implementing and delivering such schemes.

4.3 By law, Norwich City Council is not allowed to make a surplus from the licensing of HMOs, but we are able to recoup the cost of running the scheme through a licence fee. These costs include:

- time spent administering the scheme, including processing applications, serving formal notices, and taking payments.
- inspecting licensed HMOs to ensure that they are free from hazards.
- maintaining IT systems.
- identifying HMOs that should be licensed but are not.



- any additions in accordance with guidance set out at:
<https://www.local.gov.uk/publications/lga-guidance-locally-set-licensing-fees>

4.4 Once the application form is completed and all checks are concluded by the Council, the Licence Issue Fee (payable within 14 days following receipt of the 'Notice of Intention to Grant a License') should be made— This element of the fee covers the costs of issuing the licence, as well as operating and enforcing the HMO licensing scheme. Failure to make this payment will leave the property unlicensed and likely to result in enforcement action. For the purposes of this policy, this payment will be classed as a **Stage 1 payment**.

4.5 You will have an opportunity to make any representations, which we will consider.

4.6 We will then grant your HMO licence (known as the decision notice). Again, copies will be sent to all interested parties. You must then pay the final fee. For the purposes of this policy, this payment will be classed as a **Stage 2 payment**.

4.7. If you are still unhappy with any conditions, you will have an opportunity to appeal to the first-tier property tribunal.

HM Courts & Tribunals Service (Eastern Region)

First-tier Tribunal (Property Chamber) Residential Property,
Cambridge County Court,
197 East Road, Cambridge,
CB1 1BA

Telephone: 01223 841 524

Fax: 01264 785 129

Email address: RPEastern@justice.gov.uk

More information can be found at <http://www.justice.gov.uk/tribunals/residential-property> where it is also possible to download the appropriate forms.

4.8 Norwich City Council has adopted the two-stage approach. Fees and charges will be reviewed and set on an annual basis by the head of planning and regulatory services and will be published on the council's website.

4.9 Section 67 (5) of the Housing Act 2004 states that a licence may not include conditions imposing restrictions or obligations on a particular person (other than the licence holder) unless that person has consented to the imposition of the restrictions or obligation.

Refunds

4.10. In addition, the council will attach a condition to all HMO licences requiring this Stage 2 payment to be made.

4.11. Failure to make the Stage 2 payment will result in the council acting through, either the revocation or refusal of the licence or by enforcing the non-compliance of the licence condition associated with the making of the Stage 2 payment.

4.12. The licence fees include the average costs of administering applications and inspection of the HMO before a licence is issued and/or during the period of the licence, where applicable. If hazards, management failures or failures to comply with any licence



conditions are identified during the licensing inspection the cost of any follow-up work by the council will not be included in the licence fee. This is because there are other ways for us to recover our costs directly from the landlord of a non-compliant HMO, without passing that cost to all licence holders.

4.13. The fees charged at stage 1 and stage 2 are designed to reflect the council's costs in administering the licence application process, including property inspections. Under some circumstances a refund of monies amounting to the costs not yet incurred by the council may be appropriate. Further details will be included in the council's published fees and charges for HMO licensing.

5. Information you must supply:

Gas safety

5.1 If gas is supplied to the house, the licence holder must ensure that the Gas Safety (Installation and Use) Regulations 1998, or any Regulations which subsequently replace these, are complied with.

5.2 The licence holder must ensure that an annual safety check is carried out by a Gas Safe registered engineer on each gas appliance/flue in the house.

5.3 The licence holder must annually produce to the Council, for its inspection, a gas safety certificate obtained in respect of the house and produce on demand, said document within 14 days.

Safety of electrical appliances

5.4 The licence holder must ensure that the Electrical Equipment (Safety) Regulations 1994, or any Regulations which subsequently replace these, are complied with.

5.5 The licence holder must ensure that electrical appliances made available in the house by them are always kept in a safe condition and proper working order.

5.6 The licence holder must ensure that all electrical appliances made available in the house by them are inspected visually for defects, such as frayed wiring, badly fitting plugs and so on, at the beginning of each occupancy, regularly thereafter and in any event every two years.

5.7 Subject to (5.5) above, the licence holder must ensure that earthed electrical equipment (class 1) and the associated leads and plugs made available to them are tested at least every five years (more often if deemed necessary by a risk assessment undertaken by the licence holder) and produce on demand, said document within 14 days..

5.8 The licence holder must ensure that portable earthed electrical equipment (class 1) and the associated leads and plugs made available by them are tested at least every two years and produce on demand, said document within 14 days..

5.9 This testing must be undertaken by a person who is competent in the use of the testing equipment and who has the appropriate electrical knowledge and training (i.e. a competent electrician or competent other person in possession of a City and Guilds Certificate 2377).

5.10 The licence holder must ensure that as soon as any electrical appliance is identified as being unsafe, it must be removed from the house immediately.

5.11 The licence holder must ensure that a record of inspections and tests is maintained.



5.12 The licence holder must submit to the Council the record of inspections and tests within 14 days of the Council's demand.

Smoke & Carbon Monoxide Alarms

5.13 The licence holder must always ensure that a suitable fire detection system designed in accordance with BS 5839-6:2004, or any British Standard which subsequently replaces this, is installed in the house, and is maintained in proper working order.

5.14 The licence holder must ensure that the fire alarm system in the house is inspected tested and serviced in accordance with BS 5839 – part 1:2002, sections 6 and 7, or any British Standard which subsequently replaces this. In particular – where relevant – the following must be carried out:

- every six months checks on the system must be carried out in accordance with clause 45.3 of the above-mentioned BS 5839
- every 12 months checks on the system must be carried out in accordance with clause 45.4 of the above-mentioned BS 5839
- where provided independent smoke alarms must be cleaned periodically in accordance with supplier's instructions.

5.15 Throughout the period of the licence, inspection, and servicing certificates in the format recommended by BS 5839 – part 1:2002 (Annex G 6) must be submitted to the Council within 14 days of its demand.

5.16 The above-mentioned checks must be carried out by a competent person who is familiar with all British Standards relating to automatic fire detection systems, who regularly inspects automatic fire detection systems, who is qualified to inspect automatic fire detection systems and whose work is subject to regular assessment. The NICEIC, the ECA and NAPIT claim to regularly assess the competency of their contractors.

5.17 The licence holder must supply and install a carbon monoxide alarm in any room (room includes hall or landing, bathrooms, and WC compartments) of the premises which is used wholly or partly as living accommodation.

5.18 The licence holder must keep any such carbon monoxide alarm(s) in proper working order.

5.19 The Licence holder must ensure that checks are made by them or on behalf of them to ensure that each smoke and carbon monoxide alarm is in proper working order on the day the tenancy begins if it is a new tenancy.

5.20 The licence holder must supply to the Council on demand within 14 days, a declaration as to the condition and position of any smoke alarms and/or carbon monoxide alarms in the property.

Emergency Escape Lighting

5.21 The licence holder must ensure that the escape lighting in the house is inspected, tested, and serviced generally in accordance with clause 12 of BS 5266 – 1: 2005, or any British Standard which subsequently replaces this. The following must be carried out:

- every six months checks on the system must be carried out in accordance with clause 12.4.4 of the above-mentioned BS 5266



- every three years checks on the system must be carried out in accordance with clause 12.4.5 of the above-mentioned BS 5266
- for self-contained luminaires with sealed batteries, after the first three yearly test, the three yearly tests must be carried out annually in accordance with clause 12.4.6 of the above-mentioned BS 5266.

5.22 Throughout the period of the licence, periodic and test certificates in the format recommended by BS 5266 – part 1: 2005 (Annex C) must be submitted to the Council within 14 days of the demand.

5.23 The above-mentioned checks must be carried out by a competent person who is familiar with all British Standards relating to emergency escape lighting systems, who regularly inspects emergency escape lighting systems, who is qualified to inspect emergency escape lighting systems and whose work is subject to regular assessment. The NICEIC, the ECA and NAPIT claim to regularly assess the competency of their contractors.

Safety of Electrical Installations

5.24 The licence holder must ensure that the electrical installation in the house is always kept safe and in proper working order.

5.25 The licence holder must ensure that an inspection of the electrical installation in the house is undertaken in accordance with BS 7671, or any British Standard which subsequently replaces this, at intervals of no more than five years or lesser period if indicated on the previous periodic inspection report.

5.26 The licence holder must supply to the Council the latest electrical installation condition report (EICR) in the format recommended in BS 7671. within 14 days of the Council's demand

5.27 The licence holder must ensure that this report is issued by a competent person who regularly inspects domestic electrical installation systems, who is qualified to inspect domestic electrical installation systems and whose work is subject to regular assessment. The NICEIC, the ECA and NAPIT claim to regularly assess the competency of their contractors.

Storage and Disposal of Refuse

5.28 The licence holder must comply with Norwich City Councils waste collection scheme(s) relating to the storage, collection and disposal of waste arising from the HMO.

5.29 The licence holder must apply for, fund, and maintain a 'Trade Waste Agreement' as directed by Norwich City Council for the disposal of waste arising from the HMO.

Legionella

5.30 The licence holder must provide the Council a current, valid legionella test certificate within 14 days of the Council's demand.

Fire Evacuation plan

5.31 The Regulatory Reform (Fire Safety) Order 2005 sets out the legal requirements required for fire safety in the communal areas of houses in multiple occupation, maisonettes, and blocks of flats.



5.32 For all qualifying properties, there must be a responsible person for ensuring compliance. This is normally the landlord or the managing agent.

5.33 The Fire Safety (England) Regulations 2022 state that the responsible person must:

- Carry out a fire risk assessment.
- Provide fire safety information to tenants.
- Display fire safety instructions on fire doors within the property.

5.34 Regulation 9 requires the licence holder to install prominent fire safety instructions wherever the regulations apply within the property including communal areas. The instructions must contain guidance on how to evacuate the property, how to report the fire to the Fire and Rescue Service and any other relevant instructions.

5.35 Regulation 10 covers fire doors. the licence holder must tell all tenants that:

- All fire doors must be closed when not being used.
- They are forbidden from tampering with self-closing devices attached to fire doors.
- They must report any damages or faults to a fire door to the responsible person.
- The licence holder needs to inform residents in the same way as with Regulation 9- A modified version of this regulation covers buildings over eleven metres in height.

Floor Plan

5.36 The licence holder must provide the Council a plan showing existing layout of the HMO and how the rooms are used by providing a floor plan.

5.37 Items that **MUST** be included on your floorplan (your application will be invalid without the following information):

- Address of property///
- Floor level i.e. ground, first, second.
- All rooms along with their use i.e. kitchen, bedroom, WC.
- Location of stairs.
- All fire precautions currently within the property- fire blanket, fire extinguishers, alarm points, heat and smoke detectors, carbon monoxide detectors, fire doors. egress windows.
- Size of rooms (m²), not including hallways, WCs, and bathrooms.
- Number of occupants per bedroom.

6. Information it is helpful for you to supply:

Furniture and Furnishings (Fire Safety)

6.1 The licence holder must ensure that the Furniture and Furnishings (Fire Safety) Regulations 1988, or any Regulations which subsequently replace these, in respect of any upholstered furniture supplied by them, including chairs, sofas, children's furniture, beds, upholstered headboards, mattresses, scatter cushions, seat pads, pillows and upholstered garden furniture are complied with.

6.2 The licence holder must ensure that the furniture made available by them is always kept in a safe condition.



6.3 The licence holder must supply to the Council a declaration as to the safety of such furniture. within 14 days of the Council's demand

Energy Performance Certificates

6.4 The licence holder must supply to the occupiers and the council a copy of an energy performance certificate (EPC) within 14 days of the Council's demand – current regulations expect this to be a minimum 'E' or above.

Written Agreements

6.5 The Licence Holder must provide any new occupiers of the house with a written statement of terms on which they occupy it in writing prior to the commencement of any occupancy agreement. The licence holder must retain the written statements of terms and evidence of providing the written statement of terms to the occupant throughout the occupiers' period of occupation and for a minimum of five months after the occupation has ceased.

6.6 The Licence Holder must provide the Council with the written statement of terms and evidence of the provision to the occupant within 14 days on demand

7. How the Council assesses 'fit and proper' and your responsibilities

Fit and Proper Person

7.1 The council must be satisfied that "the proposed management arrangements are satisfactory" before granting an HMO licence. Those arrangements include (but are not limited to) consideration of whether:

- the persons* proposed to be involved in the management of the premises have a sufficient level of competence to be involved
- the persons proposed to be involved with the management of the premises are involved in the management
- those persons are 'fit and proper,' and
- the proposed management structures and funding arrangements are suitable.

7.2 It is for a council to determine whether a person has sufficient competence to be involved in the management of HMOs and, of course, the level of competence required will in some measure be determined by the complexity of the management challenges posed. The council will therefore be looking at the applicant's experience and record of accomplishment of managing HMOs and, where they are the existing manager, the premises to which the application relates, and whether they belong to a recognised trade association or are a member of an accreditation scheme.

7.3 The management structures must be such that the manager is able to comply with any licence conditions and deal with the day-to-day operation management issues that arise as well as being able to deal with longer term management issues. In considering whether the structures are appropriate the council may take account of the following:

- evidence as to whether the systems in place are sufficient to enable the manager to comply with any condition of a licence or if such systems can be put in place through a condition of a licence to ensure compliance.



- evidence of the systems for dealing with:
- emergency repairs and other issues
- routine repairs and maintenance to the premises and its curtilage
- cyclical maintenance
- management and the provision of services (if any) to the building and its curtilage
- management of tenancies or occupants
- management of the behaviour of tenants, occupants, and their visitors to the premises
- neighbourhood issues (including disputes)
- evidence of structures for engagement with the local authority, police, and other agencies, where appropriate

*Persons – may include owner, landlord, letting agent or another person

7.4 The manager or a competent representative will need to operate within a reasonable proximity to the HMO, so that they can attend to matters promptly and retain an overview on the condition of the premises and the management of the tenancies. Consideration of reasonable proximity will be taken on the merits of each individual case, however within the county boundary may be a reasonable guide. A competent representative may be an individual who is not necessarily part of a letting or estate agency but should be able to deal with, or have knowledge, of any relevant matters in representing the property manager.

7.5. The council must also be satisfied that the financial arrangements relating to the HMO are suitable. In that regard the manager must be sufficiently funded or have access to funding to carry out their obligations under the licence and their general management functions.

7.6 The council can vary or revoke a licence at any time during the licence period if there is sufficient evidence to support these decisions. Unannounced visits of licensed properties may therefore be undertaken during the licence period to check for compliance with the licensing and management regimes which apply. This is consistent with the powers provided under Section 239 of the Housing Act 2004.

7.7 Breach of any such legislation is an offence for which further action will be taken. The Housing, Health, and Safety Rating System (HHSRS) also applies to rented properties and (if appropriate) remedial works can be enforced via The Housing Act 2004, which will be separate to the powers provided under the licensing scheme.

7.8 The licence holder must inform the Council in writing if, since becoming the licence holder, he/she commits any of the actions described within paragraphs below. Notification to the authority must be within 21 days of such a contravention via email.

7.9 The licence holder must inform the Council in writing, if the person managing the property contravenes any of the sections below. This must be done within 21 days of such a contravention via email.

7.10 The following is also considered by the Council when it assesses whether the licence holder or manager is a fit and proper person:

- a) Have committed an offence involving:
 - Fraud



- Dishonesty
- Violence
- Drugs
- Sexual Offences Act Schedule 3.
- Practised unlawful discrimination on grounds of sex, colour, race, ethnic or national origins or disability in connection with a business.
- Contravened any provision of housing or landlord and tenant law. In particular: subject to proceedings by a local authority
 - where the local authority has had to carry out works in default
 - subject to a management order under the Housing Act 2004
 - or been refused a licence or breached conditions of a licence.
 - acted in contravention of any Approved Code of Practice.
 - failed to register with a property redress scheme as appropriate.

8. Your responsibility as a Licence Holder

Changes to the Licence

8.1 The licence holder must inform the Council in writing if they no longer reside at the address given and provide the authority with new address details within 21 days of a change.

8.2 The licence holder must inform the Council in writing where there is a change in any managing agent within 21 days of such a change.

8.3 If the licence holder is a managing agent, they must inform the Council in writing if the person who is specified as the main contact ceases to be employed by them and inform the authority of a new contact within 21 days of such a change.

8.4 If the licence holder is a managing agent, they must inform the Council in writing if they cease to have an interest in the property within 21 days of such a change.

8.5. The licence holder is responsible for updating HM Land Registry with any changes.

General Public Health and Environmental Housing Standards

8.6 The licence holder must ensure that the exterior of the house is maintained in a reasonable decorative order and in reasonable repair.

8.7 The licence holder must ensure that gardens, yards, paths, and drives, where present, are maintained such that their condition does not adversely affect the amenity of the neighbourhood. To that extent the licence holder must ensure that gardens, yards paths and drives and other areas within the curtilage of the house are always kept in a clean and tidy condition and free from rodent infestations.

Landlord and Tenant Issues

8.8 This is a procedure to be followed if or when a landlord has been made aware of the occurrence of anti-social behaviour. For the purpose of transparency, this process should be made available to tenants at the start of their tenancy agreement.

The licence holder must cooperate with the Council, the Police Service and any other agencies in resolving complaints of anti-social behaviour.



The licence holder should address problems of anti-social behaviour resulting from the occupiers or their visitors by following the procedure set out below:

- If a complaint is received, or anti-social behaviour is discovered, the licence holder must contact the tenant within 14 days. The tenant must be informed in writing of the allegations made against them and of the consequences of its continuation.
- The licence holder must monitor any allegations of anti-social behaviour for a period of 28 days, from the date the complaint was received.
- If after 28 days, it is found that the anti-social behaviour is continuing the licence holder must visit the premises within 7 days and provide the tenant with a warning letter advising them of the possibility of eviction if their behaviour continues.
- If after 14 days of giving a warning letter, the tenant has not taken steps to address the anti-social behaviour and it is continuing, the licence holder must act, which may include legal eviction proceedings.
- The licence holder must ensure that written notes are kept of any meetings, telephone conversations or investigations regarding anti-social behaviour for 3 years, and if requested by the Council, provide this information within 28 days on demand.
- Any letters, relating to antisocial behaviour, sent or received by the licence holder must be kept for 3 years by the licence holder and if requested by the Council, provide copies of them within 28 days on demand.
- Where the licence holder or his agent has reason to believe that the antisocial behaviour involves criminal activity the licence holder must inform the appropriate authorities.

8.9 The licence holder currently must

- keep their rented properties safe and free from health hazards.
- protect the tenant's deposit in a government-approved scheme.
- check the tenant has the right to rent your property if it is in England.
- give the tenant a copy of the *How to rent* checklist when they start renting from you (it can be emailed)

Maximum Permitted Occupation

8.10 Conditions require the licence holder—

(a) to ensure that the floor area of any room in the HMO used as sleeping accommodation by one person aged over 10 years is not less than 6.51 square metres.

(b) to ensure that the floor area of any room in the HMO used as sleeping accommodation by two persons aged over 10 years is not less than 10.22 square metres.

(c) to ensure that the floor area of any room in the HMO used as sleeping accommodation by one person aged under 10 years is not less than 4.64 square metres.

(d) to ensure that any room in the HMO with a floor area of less than 4.64 square metres is not used as sleeping accommodation.



- e) The total number of occupants does not exceed that stipulated in the licence
- f) The occupancy of any particular room does not exceed the occupancy limit specified in the licence
- g) Only rooms that are suitable for occupancy may be used as living accommodation

8.11 Conditions require the licence holder to ensure that—

- (a) where any room in the HMO is used as sleeping accommodation by persons aged over 10 years only, it is not used as such by more than the maximum number of persons aged over 10 years specified in the licence.
- (b) where any room in the HMO is used as sleeping accommodation by persons aged under 10 years only, it is not used as such by more than the maximum number of persons aged under 10 years specified in the licence.
- (c) where any room in the HMO is used as sleeping accommodation by persons aged over 10 years and persons aged under 10 years, it is not used as such by more than the maximum number of persons aged over 10 years specified in the licence and the maximum number of persons aged under 10 years so specified.

8.12 Persons of different sexes and aged ten or over should not be permitted to share the same room for sleeping purposes unless they are married or living as partners.

8.13 However, it is recognised that for short term emergency accommodation where there is no other appropriate accommodation available the placing of families with children over ten in a family room may be the only option available. In such circumstances and where the Authority have no safeguarding concerns such occupation may be permitted but all available steps must be taken to ensure that the family's stay is kept to a minimum. Such occupation of family rooms must only be for temporary accommodation and occupation must be limited to a maximum of 42 nights unless there are exceptional circumstances agreed by the Local Authority

8.14 The licence holder must ensure that the maximum number of households/occupants specified in the licence conditions is not exceeded and must confirm with the Local Authority that placements will not cause the number of permitted occupants to be exceeded.

8.15 Only rooms designated as bedrooms may be used for sleeping accommodation.

8.16 Rooms containing cooking facilities within the room itself are not suitable to accommodate families with children below the age of 5 years.

Storage and Disposal of Refuse

8.17 The licence holder must provide and maintain an adequate number of waste wheeled bins for the number of households and rubbish produced.

8.18 The licence holder must ensure that there is adequate off-street storage for all waste receptacles between collections and that bins are not unnecessarily left on the street between collection days.

8.19 The licence holder must ensure that all occupiers of the HMO are provided with adequate information on the appropriate disposal of refuse, the relevant days of collection and any reasonable recycling schemes imposed by the local authority.



8.20 The Licence holder must ensure that all internal and external refuse bins and bin storage areas, structure and hard standings are maintained in a clean and serviceable condition.

9. Administering the application and issuing a licence

Issuing a licence

9.1. Norwich City Council does not have to conduct an inspection of an HMO as part of the licensing process. However, in conducting its licensing function Norwich City Council may become aware of properties where inspection is necessary. This requirement applies to licence renewals, therefore there must be some form of regular check of all licensed HMOs every five years.

9.2. Norwich City Council is required to satisfy itself that a licensable HMO is free of category 1 (serious) hazards and whether action is required to address any category 2 (other) hazards under Part 1 of the Housing Act 2004 (the Housing Health and Safety Rating System). Norwich City Council has a duty to do this as soon as reasonably practicable and not later than five years after receipt of a licence application as per s.55(5)(c) and (6) of the Housing Act 2004

9.3. All HMOs will also remain subject to further inspections during the lifetime of the licence to check compliance with licence conditions, management responsibilities and minimum standards. Frequency of inspection will be driven by a risk assessment of all the data relevant to the property and/or licence holder/manager. This will be modelled on a risk profile.

- Prior resolved category one hazards – 12 months
- Prior resolved category two hazards – 24 months
- Remainder – in the period of the licence.
- Any unresolved Cat 1 hazards will either have their licences refused or revoked, after due consideration of the circumstances on a case by case basis.

9.4. In certain cases, the council may decide to conduct such inspections without prior notice being given to the owner, licence holder and /or manager. This is consistent with the powers set out in Section 239 of the Housing Act 2004.

9.5. Where the inspection has been pre-arranged then licence holders, or applicants where applicable, will be required to provide access to all rooms in the HMO at a suitably arranged appointment.

9.6. All contact with the licence holder and relevant person(s) will be made using the contact information provided by the applicant on the original application. Accordingly, it is the licence holder's responsibility to ensure that all contact details are up to date, and you must notify the council of any change in details. The council will not be held responsible for any delay in communication if it is because of any contact information changing.

9.7. Where it is deemed appropriate to issue a licence, all parties will be issued with all relevant conditions for consultation.

9.8. Relevant persons will have an opportunity to make any representations, and these will be considered by the authority.



9.9. Representations must be submitted to the HMO Licensing Team within a maximum of 21 days of the date the licence is sent. Representations received outside of this period will not be considered.

9.10. A suitably qualified/experienced member of the licensing team will consider representations; and the licence varied or issued, as necessary.

9.11. Where the inspection has been pre-arranged then licence holders, or applicants where applicable, will be required to provide access to all rooms in the HMO at a suitably arranged appointment.

9.12. If the licence holder is still dissatisfied with the conditions or terms of the licence, they will have an opportunity to appeal to the First-tier Property Tribunal. The details of how this appeal can be made will be provided with the licence.

Renewal applications

9.13. The Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (Amendment) (England) Regulations 2012 set out amendments to “renewal applications”, which reduces the burden on landlords applying for the renewal of a licence.

9.14. In the case of renewal applications an applicant must provide a complete application form and sign the declarations provided.

9.15. Regulations define a “renewal application” as “an application for a licence under section 63 of the Act where, at the time the application is made a licence of the kind applied for is already held by the applicant and has effect in respect of the HMO or house”.

9.16. The effect of this part of the Regulations is that for the council to treat any application as a “renewal” the application must be made during the active period of the current licence. If a renewal application is received after expiry of the previous licence, then the application will be treated as refused and a new licence application will need to be submitted, along with the appropriate fee.

9.17 It is important to note that it is the licence holder’s responsibility to apply to renew the licence at the appropriate time. The council may send reminders prior to the expiry of any current licence, but these should not be relied upon to prompt a timely application.

Revocation or variation of a licence

9.18. If circumstances regarding the HMO change during the licence period, the licence holder must notify the council directly so the licence can be re-assessed and varied if the HMO is considered suitable to accommodate the variation request.

9.19. The types of change requiring a variation to the licence would be:

- there is a change in the number of kitchens (including bedsits), or bathrooms provided.
- there is a change to the design or layout of the property.
- there is a change of management or ownership.
- there is a change of mortgage provider.

9.20. Similarly, if the HMO is no longer going to be occupied as an HMO or the licence holder changes, then the licence holder must make an application for the licence to be



revoked. Any remaining period of the licence will be forfeited and there will be no right to refund of the original payment.

9.21. Where there is a change of licence holder, there is no facility to transfer the licence to another party. A new licence application must be submitted, and the old licence revoked.

9.22. As well as voluntary revocation set out above, The Housing Act 2004, s.70 and s.70A also set out other circumstances where the council may take action to revoke a licence. This action falls into two categories:

9.22.1. Circumstances relating to licence holder or another person, such as:

- where the authority considers that the licence holder or any other person has committed a serious breach of a condition of the licence or repeated breaches of such a condition
- where the authority no longer consider that the licence holder is a fit and proper person to be the licence holder; and
- where the authority no longer consider that the management of the house is being continued by persons who are in each case a fit and proper person to be involved in its management.
- Where a banning order is made under section 16 of the Housing and Planning Act 2016 against the licence holder, or a person who— (i) owns an estate or interest in the house or part of it, and (ii) is a lessor or licensor of the house or part of it.

9.22.2. Circumstances relating to HMO concerned, such as:

- where the authority considers at any time that, were the licence to expire at that time, they would, for a particular reason relating to the structure of the HMO, refuse to grant a new licence to the licence holder on similar terms in respect of it.

Licence period

9.23 HMO licences cannot be granted beyond a 5-year period. If fully compliant with both the law and policy then it will be normal practice to issue a 5-year licence.

Decision making - delegation of authority.

9.24. All decisions regarding the grant, refusal, modification, and revocation of HMO licences are delegated to the post of head of planning and regulatory services, or any subsequent post fulfilling the responsibilities of overseeing the HMO licensing function.

How long will it take to process an application?

9.25. Upon receiving a valid application, the council will aim to provide a decision as soon as is reasonably practicable. However, each case will require different processes to be completed before issuing a decision and will be dependent on the applicant supplying the required information and necessary payments within timescales, and that no representations are made. Where information or payments are late, or representations made, then this could extend the time it takes to process your application.

9.26. It is therefore the council's aim to process all valid applications and provide the relevant persons with a decision within 20 weeks of receipt. This will require the full co-



operation of the applicant with the council's requirements for determining a licence application.

9.27. Tacit consent does not apply to HMO licence applications. It is in the public interest that we check that the HMO meets the prescribed standards, which may include arranging a full property inspection, before a licence can be granted.

Public registers

9.28. A register of HMO licences is available on the council's website. Full details are also available by request to the HMO licensing team.

Appeals

9.29. If an application for an HMO Licence is refused, or the terms of a licence granted are disputed, there is a right to appeal this decision within 28 days to the First-tier Tribunal (Property Chamber -Residential Property). The details of this will be provided with the relevant documentation relating to the refusal or granting of the licence.

Appendix A

Private Sector Housing Amenity Standards Booklet

https://www.norwich.gov.uk/downloads/file/2252/amenity_standards_booklet

If you need this information by email for use with the read-aloud function or in an alternative format, please contact us on 0344 980 4444 or visit



www.intran.org

What is being assessed	Houses In Multiple Occupation Policy	Status	First assessment of new policy
Officer completing	Phil Stacey	Role	Team Leader
Team	Private Sector Housing	Directorate	Development and City Services
Senior leadership team sponsor	Sarah Ashurst	Role	Head of Planning and Regulatory Services

What are the main aims or purpose of the policy, practice, service or function? *(include links to project briefs, cabinet reports etc)*

To update the current practices of Houses in Multiple Occupation (HMO) Licensing administration and inspection of properties to more closely align with both current and new legislation.

How does it fit with other services and policies, and how does it support our [corporate objectives](#) and [City Vision](#)?

The HMO policy supports the council to meet a number of the council's priorities as outlined in its Community Led-Plan. These being:

A Fairer Norwich – This policy supports our efforts to ensure our city, and local neighbourhoods are safe, diverse and vibrant and that there are good quality homes for all.

An open and model council – This policy provides a clear and open demonstration to licence holders of what is required to make sure their properties meet the requirements of the law. It promotes the values of NCC to provide good quality and regulated housing provision in the city.

A Prosperous Norwich – This policy ensures the highest standards in Houses in Multiple Occupation which creates an environment encouraging people to live, work and contribute to the Norwich economy

What is the reason for the proposal or change (financial, legal etc)? *The Equality Act requires us to make this clear.*

There is no specific requirement under the legislation for a local authority to adopt a specific policy on its approach to HMO licensing, however it is considered good practice to do so to enable the council to:

- Set out its approach for the benefit of operators
- Guide and reassure the public and other public authorities
- Ensure transparency

- Ensure consistency

Who implements, carries out or delivers the policy, practice, service or function? *(person/team/body and other organisations who deliver under procurement or partnership arrangements)*

The Private Sector Housing Team

What outcomes do we want to achieve, why and for who?

The HMO policy details the requirements of applicants for a licence to provide the Council with the information it needs to deliver its statutory functions and provide a safe environment for occupiers to live in. By providing clearer requirements to licence holders and to their residents it will enable parties to determine statutory compliance and make it easier to address concerns more quickly and effectively.

Will anyone be disproportionately affected by the programme, and/or will it create any benefits? *(customers, employees, groups in the wider community etc)*

The statutory requirement to licence certain HMO's is intended to ensure that certain housing standards are met in the private rented sector, particularly in relation to health, welfare and wellbeing of the occupants, including adults and children. A recent study commissioned by NCC, shows HMOs provide affordable accommodation to groups who are unable to afford self-contained accommodation including students, young professionals and vulnerable people.

If yes, complete the relevant sections below for any benefits and adverse impacts identified.

Affected group	Key findings from analysis of data and evidence. Identify any gaps in data here	Level & type of impact: low/medium/high, positive/adverse	Justifiable if adverse	Actions to mitigate impacts, maximise benefits or address identified gaps in data	By when
Age	Improvements in the health, welfare and wellbeing of the occupants, including adults and children.	Positive		All groups should see benefits.	Over the life of the policy
Disability	As above	As above		As above	As above
Gender reassignment	As above	As above		As above	As above

Equality Impact Assessment

Marriage and civil partnership	As above	As above		As above	As above
Pregnancy and maternity	As above	As above		As above	As above
Race/ethnicity	As above	As above		As above	As above
Religion and belief	As above	As above		As above	As above
Sex/gender	As above	As above		As above	As above
Sexual orientation	As above	As above		As above	As above
Other groups	N/A	No impact disproportionately affecting any marginalise group identified.	N/A	N/A	N/A

What evidence and data has been used for this assessment, including community engagement and consultation? (include links to data sources, consultations etc)

Analysis of reports and complaints to the Council highlight the need to update and strengthen the policy.

How has the equality impact assessment informed or changed the proposal?

Yes. Careful consideration has informed the draft policy, particularly in relation to health, welfare and wellbeing of the occupants of HMO's.

What actions have been identified going forward?

To implement the new policy. Further full consultation for 6 weeks will take place.

How will the impact of your proposal and actions be measured moving forward?

Reduction in the reports of illegal HMOs.

Reduction in the number of complaints against landlords of HMOs with unsatisfactory standards within their properties.

Officer completing assessment	Phil Stacey	Date	18.11.2024
Senior leadership team sponsor	Sarah Ashurst	Date	26.11.2024
Equality lead (strategy team)	Joe Siggins	Date	22/11/2024