

# **Isle of Anglesey Rapid Health Impact Assessment.**

## **HMO Additional Licencing Scheme.**

**17<sup>th</sup> September 2012**



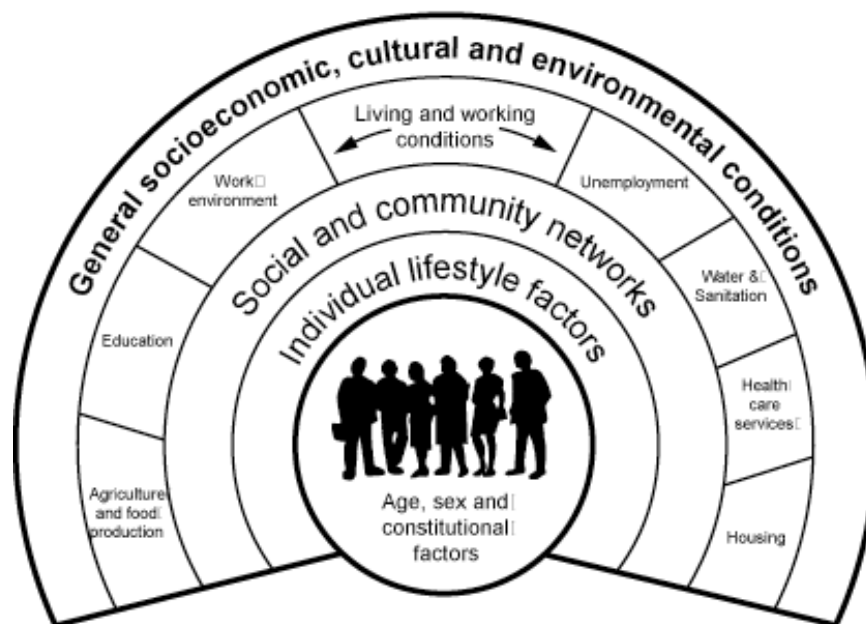
**"Inequalities in health are the most fundamental inequalities...there is no greater inequality than, being dead and being alive" (*Frank Dobson*)**

## What is Health?

Health has been defined by the World Health Organisation (WHO, 1984) as:

*"Health is much more than not being ill. It is a resource for everyday living and allows people to fulfil their potential. Health is a state of physical, mental and social well-being – not just the absence of illness".*

This vision for health has been captured in Dahlgren and Whitehead's 'Rainbow of Determinants' diagram (1991), which depicts all the wider factors which determine our health and well-being:



A few things to note are:

- Contribution of traditional 'Health Care Services' – access to these services are of course important when we get unwell, but they only form a small part in the larger picture of Community Health & Well-being
- The significant role of the Local Authority in directly influencing most of the other determinants e.g. Housing, Education, Employment, Safe Food and Water, Culture, Transport.

More recently in community research, inequalities in health have become more apparent, where the above determinants all contribute to disproportionate levels of ill-health in the most deprived areas. This relationship is strongly linked to wealth inequalities.

*"Even in the most affluent countries, people who are less well off have substantially shorter life expectancies and more illness than the rich... scientific attention to this has led to a growing understanding of the remarkable sensitivity of health to the social environment and to what have become known as the social determinants of health" (WHO, 2003).*

In our role as a Local Authority, we must aim to understand and address the Wider Determinants of Health at community, policy, scrutiny and strategic levels in order to improve Health and Well-being and Reduce Health Inequalities. One tool that has been developed for this purpose on Anglesey is the **Health Impact Assessment** (HIA).

## **What is a Health Impact Assessment?**

Health impact assessment (HIA) represents a new approach to the evaluation of social, economic and environmental policies, programmes and projects on people's health and wellbeing. Its purpose has been defined as:

*"To assess the potential health impacts – positive and negative – of policies, programmes and projects....and to improve the quality of public decision making through recommendations to enhance predicted positive health impacts and minimise negative ones"* (Scott-Samuel et al., 1998)

In addition, HIA is not the preserve of any one disciplinary group. Instead, it can draw on the experience and expertise of a wide range of stakeholders, including perhaps most importantly, representatives of the communities whose lives will be affected by the policy.

## **How can HIA be applied?**

Ideally, HIA should be applied *prospectively* (before policy, programme or project implementation) to ensure that steps are taken, at the planning stage, to maximise positive health impacts and to minimise the negative effects. In practice it is not always possible to do this, so HIA may also be carried out *concurrently* (during the implementation stage) or *retrospectively* (after it has finished) in order to inform the ongoing development of existing work.

HIA is very flexible and can be undertaken in varying levels of detail as a rapid process (1-3 hrs) or a more in-depth study (up to 12 months) depending on the resources available; it can be applied to policies, programmes or projects. However, studies have shown that a rapid HIA can provide up to 90% of the benefit of a more in-depth study.

Anglesey has developed its own HIA Tool, based on the Wider Determinants of Health model and this has been applied below.

## **Executive Summary**

### **Title of programme, policy or project including key aims and objectives: HMO Additional Licencing**

There are potentially 266 HMOs on Anglesey not covered by the mandatory licensing scheme. The construction of a new nuclear power plant as well as other Energy island projects, are likely to have a massive impact on the population of Anglesey and place additional demand on the current stock of HMO accommodation on the Island. It is, therefore, vitally important that the current stock of privately rented HMO accommodation on Anglesey complies with current standards of occupation. It is proposed to introduce an additional licensing scheme which will cover smaller HMOs; single storey or more and three or more people living in the property. The fee proposed is £505.00, subject to the consultation exercise. This Rapid HIA has been undertaken as part of this consultation exercise.

**What contribution does the activity make to: (Key: -- (significant negative), - (moderate negative), Neutral (no clear effect), NA (not applicable), + (moderate positive), ++ (significant positive))**

<b>1. Vulnerable Groups?</b>	<b>++</b>	<b>+</b>	<b>Neutral</b>	<b>-</b>	<b>--</b>	<b>N/A</b>	<b>Supporting Evidence / Effect on Inequality:</b>
Age related, income related, who may suffer discrimination or other social disadvantage, geographical areas	++						Controlling of rogue landlords. Negative effects of increased demand for HMOs. Unlicensed HMOs could cause anti social behaviour and exploitation of vulnerable groups such as people with mental health issues. Potential exploitation of migrant workers, who may be prepared to accept a lower standard of accommodation.
<b>2. Individual lifestyles?</b>	<b>++</b>	<b>+</b>	<b>Neutral</b>	<b>-</b>	<b>--</b>	<b>N/A</b>	<b>Supporting Evidence / Effect on Inequality:</b>
Diet, physical activity, use of alcohol / tobacco / other non-prescription drugs, sexual activity, other risk-taking activity		+		-			Could help to control standards and levels of occupancy. Increases officer contact and has the potential to increase referrals to other departments/agencies. However, increased regulation and cost could deter landlords from offering accommodation to vulnerable groups.

<b>3. Social and community influences on health?</b>	<b>++</b>	<b>+</b>	<b>Neutral</b>	<b>-</b>	<b>--</b>	<b>N/A</b>	<b>Supporting Evidence / Effect on Inequality:</b>
Family organisation & roles, social support networks, local pride, social isolation, cultural ethos, racism		+					Reduces the risk to families with children or vulnerable individuals living in over crowded situations and socially disruptive situations. Local authority could consider additional support mechanisms for both tenants and landlords in order to counter anti social behaviour.
<b>4. Living and environmental conditions affecting health?</b>	<b>++</b>	<b>+</b>	<b>Neutral</b>	<b>-</b>	<b>--</b>	<b>N/A</b>	<b>Supporting Evidence / Effect on Inequality:</b>
Housing, neighbourhood design, noise & air quality, community safety, road hazards, waste, attractiveness of area	++						Possible differences between housing and planning definition of HMOs, (the need for closer collaboration with planning and building control). In addition, refuse and car parking issues may possibly be controlled by planning, through such things as secure by design. Additional licensing scheme (ALS) will help to gauge what the proliferation of HMOs will be.
<b>5. Economic conditions affecting health?</b>	<b>++</b>	<b>+</b>	<b>Neutral</b>	<b>-</b>	<b>--</b>	<b>N/A</b>	<b>Supporting Evidence / Effect on Inequality:</b>
Unemployment, income, economic inactivity, type of employment, workplace conditions						x	
<b>6. Access and quality of services?</b>	<b>++</b>	<b>+</b>	<b>Neutral</b>	<b>-</b>	<b>--</b>	<b>N/A</b>	<b>Supporting Evidence / Effect on Inequality:</b>
Medical and other caring services, careers advice, transport, education and training, shops, information technology		+					Could aid referral to support services through such things as increased officer contact with tenants.
<b>7. Macro-economic, environmental &amp; sustainability factors</b>	<b>++</b>	<b>+</b>	<b>Neutral</b>	<b>-</b>	<b>--</b>	<b>N/A</b>	<b>Supporting Evidence / Effect on Inequality:</b>
Government policies, gross domestic product, economic development, biological diversity, climate		+					New housing policy recommends every landlord is accredited and enables better control. Knowledge about incentives and schemes could help to improve properties. Increased knowledge

7. Macro-economic, environmental & sustainability factors	++	+	Neutral	-	--	N/A	Supporting Evidence / Effect on Inequality:
							about HMO areas could influence policy. More awareness about racism and equality issues may be required. Information packs could increase cultural awareness.

## Full Rapid Health Impact Assessment

<b>The Isle of Anglesey Health Impact Assessment Tool:</b> The tool is designed for use both in developing policies and in evaluating projects and policies during development and delivery. It should help to stimulate dialogue, generate new ideas and encourage 'joined-up' thinking. This tool is designed to help you think about the potential impact the outcomes of the project or policy may have on the Health and Wellbeing of individuals and communities on Anglesey.	<p><b>Health is much more than not being ill. It is a resource for everyday living and allows people to fulfil their potential. Health is a state of physical, mental and social well-being – not just the absence of illness (WHO, 1984)</b></p> <p><b>This framework will therefore strive to 'promote healthy and energetic individuals and communities' (<i>Community Strategy</i>)</b></p>				Part 1 completed by	Representing	date
					Appraisal Group	Representing	date
						IACC	17/09/12
						IACC	17/09/12
						IACC	17/09/12
						IACC	17/09/12
Checked by		Representing	date				
		IACC	18/09/12				
Approved by		Representing	date				
		IACC	18/09/12				
Please use the following scale when considering what impact the activity / policy / project may have on Health and Wellbeing:							
	++	Very Positive impact on Health and Well-being	-	Negative impact on Health and Well-being			
	+	Positive impact on Health and Well-being	--	Very negative impact on Health and Well-being			
	N	Neutral	N/A	Not Applicable – to Health and Wellbeing			

Title of programme, policy or project: HMO Additional Licencing Scheme
Description (key aims and objectives): See "The Scheme"

# The Scheme

- 1.1 The population on Anglesey is currently 69,700<sup>1</sup>. The Isle of Anglesey County Council (IoACC) Private Sector Housing Stock Condition Survey 2008 identified that the Island has 27015 private dwellings, of which 2301 dwellings (8.3%) are private rented<sup>2</sup>. The sector has an important role in providing housing for those not wishing or able to consider home ownership, or for those for whom social housing is not an option, as well as providing housing for Bangor University's student population. However, one potential project that will have a massive impact on the population of Anglesey is the construction of a new nuclear power plant. This is in addition to the changes in Local Housing Allowance and Housing Benefit, and the proposed changes to homelessness legislation, which will place a demand on the current stock of HMO accommodation on the Island. It is, therefore, vitally important that the current stock of privately rented HMO accommodation on Anglesey complies with current standards of occupation (section 356 Housing Act 1985), fitness and fire precautions (Part 1 Housing Act 2004, LACORS Housing Fire Safety) and that any landlords wishing to adapt houses into HMOs have a clear understanding of their legal responsibilities. By introducing an additional licensing scheme for our smaller HMOs, the IoACC will be able to ensure they are 'fit for purpose'.
- 1.2 The IoACC is eager to ensure that the sector meets the demands placed upon it by the housing needs of the wide range of private rented tenants, by providing well managed and quality accommodation.
- 1.3 There are specific issues in the privately rented housing sector, which require tailored action to address embedded problems of ineffective management and substandard internal and external conditions. The link between poor housing and ill health is well recognised. Perhaps less well recognised is the impact that poor housing can have on social well-being, educational attainment and a sense of belonging. Research has shown that adults living in bedsit type HMOs are six times more likely to die in a fire than those living in comparable single-occupancy houses<sup>3</sup>. Licensing HMOs will give Environmental Health officers a much better chance of uncovering those with defects and ensuring that they are brought up to a satisfactory condition.
- 1.4 As well as improving conditions and safety in HMO properties, licensing has social and financial benefit to the general economy of the island. It maintains the buoyancy of the rental market by ensuring that conscientious landlords are not disadvantaged by non-compliant landlords.

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<sup>1</sup> <http://www.ons.gov.uk/ons/publications/re-reference-tables.html?edition=tcn%3A77-272473>

<sup>2</sup> PSH Condition Survey, 2009

<sup>3</sup> Fire risks in HMO's (DETR 1997)



- 1.5 Mandatory HMO licensing, which applies nationally, is aimed at HMOs which present the highest risk, namely those of three storeys or more and occupied by five or more persons, who are not living together as a single family or other household. Currently there are 12 properties licensed under the existing mandatory licensing scheme. In addition to these larger HMOs, there are potentially 266 HMOs on Anglesey not covered by the mandatory licensing scheme. It is proposed that the additional licensing scheme will cover smaller HMOs; single storey or more and three or more people living in the property.
- 1.6 The fee that is set must be justifiable, and representative of the local authority's costs. The IoACC proposes to charge a fee of £505.00, as specified under section 63(3) Housing Act 2004. The fee will cover the life of the licence which is 5 years. The proposed fee structure is based on the Local Government Association licensing application toolkit for HMOs<sup>4</sup>. Using the average licence fee figure of £505.00 for five years, this works at around £1.94 a week for the whole property.
- 1.7 Before introducing any additional licensing of HMOs, the Authority must comply with the specific requirements set out within sections 56 and 57 of the Housing Act 2004. This involves being satisfied that a significant proportion of HMOs of that description in the area are being managed sufficiently ineffectively so as to give rise, or are likely to give rise, to one or more particular problems either for those occupying the HMOs or for members of the public. Consultation must also take place and the scheme must also be consistent with the Authority's overall housing strategy.
- 1.8 The scheme to which the designation applies has the General Approval of the Welsh (Assembly) Government, under the Housing Act 2004 (Additional HMO Licensing) (Wales) General Approval 2007, for which approval came into force on 13 March, 2007. Accordingly, by virtue of Section 58 subsections (1)(b) and (7), the designation need not be confirmed and will come into effect on a date to be specified. However, before using the discretionary power to designate an Additional HMO Licensing Area, the IoACC has to carry out a thorough appraisal and consultation exercise with stakeholders. This Rapid Health Impact Assessment has been carried out as part of this appraisal and consultation process.

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<sup>4</sup> [http://www.local.gov.uk/web/guest/briefings-and-responses/-/journal\\_content/56/10171/3488403/ARTICLE-TEMPLATE](http://www.local.gov.uk/web/guest/briefings-and-responses/-/journal_content/56/10171/3488403/ARTICLE-TEMPLATE)

What contribution does this activity make to:		Expected effect of activity :						Supporting Evidence / Effect on Inequality:
1. Vulnerable Groups?		++	+	Neutral	-	--	N/A	
1a	Age related groups (e.g. children and young people, adults 18-64, older people)		+					Provides the advantage of protecting younger people living within the HMOs witnessing unsociable behaviour. Officers can assess such situations within HMOs.
1b	Income related groups (e.g. families or individuals on low income / economically inactive / unemployed / unable to work due to ill health)				-			Driving up standards could have an impact on affordability of accommodation, as sub standard properties which may be cheaper may not be tolerated.
1c	Groups who suffer discrimination or other social disadvantage (e.g. people with disabilities / mental health groups / carers / refugee groups / people seeking asylum / travellers / single parent families / lesbian and gay people / ethnic, linguistic and cultural groups / religious groups)			X				It is the choice of the landlord as to who they have as tenants.
1d	Geographical issues (e.g. people living in areas known to exhibit poor economic and/or health indicators / people living in isolated areas / people unable to access services and facilities)		+					There is an opportunity for officers to intervene earlier in issues and to identify locations that have a high number of HMOs.

What contribution does this activity make to:		Expected effect of activity :						Supporting Evidence / Effect on Inequality:
2. Individual Lifestyles?		++	+	Neutral	-	--	N/A	
2a	Diet		+					Enforcement of minimum standards for food preparation and storage areas.
2b	Physical Activity						x	
2c	Use of alcohol, cigarettes, non-prescription drugs		+					Overcrowding could lend itself to risk-taking behaviour by tenants.
2d	Sexual activity		+					Overcrowding could encourage an increase in sexual activity and sexual abuse.
2e	Other risk-taking activity		+					Illegal activity and illegal sub letting.

What contribution does this activity make to:		Expected effect of activity :						Supporting Evidence / Effect on Inequality:
3. Social & Community Influences on Health?		++	+	Neutral	-	--	N/A	
3a	Family organisation and roles		+					Encourages minimum standards and can help to identify social problems.
3b	Citizen power and influence	++						People feel more empowered to challenge landlords on quality of the accommodation, through awareness of Local Authority support.
3c	Wider social support, social networks and neighbourliness		+					Can ease neighbour tensions and improve an environment for co operation between tenants.
3d	Community identity and sense of belonging		+					Workers should feel that the Council is looking after their welfare.
3e	Divisions in community and peer pressure			x				Controlling overcrowding.
3f	Social isolation		+					Local authority officers will have increased contact with tenants.
3g	Cultural and spiritual ethos						x	
3h	Racism		+					Contact with tenants and educating landlords about different cultural /religious groups. Information could be provided to tenants about local services.
3i	Other social exclusion		+					Information could be provided to tenants about local services e.g. LA could consider producing a handbook.
3j	Anti-social behaviour & the Fear of Crime	++						Influential for flagging up areas of anti social behaviour. Supporting landlords to deal with such situations. Landlord training on mechanisms and responsibilities to reduce anti social behaviour.

What contribution does this activity make to:		Expected effect of activity :						Supporting Evidence / Effect on Inequality:
4. Living & environmental conditions affecting health?		++	+	Neutral	-	--	N/A	
4a	Built environment and / or Neighbourhood design	++						Possible differences between housing and planning definition of HMOs, (the need for closer collaboration with Planning and Building Control). In addition, refuse and car parking issues may possibly be controlled by planning, through such things as secure by design. Additional licensing scheme (ALS) will help to gauge what the proliferation of HMOs will be.
4b	Housing and / or Indoor environment	++						Will drive standards up.
4c	Noise and / or Smell / odour	++						Will reduce noise complaints and improve cleanliness.
4d	Air and water quality						x	
4e	Attractiveness of area		+					Applying standards to areas where standards may not have been applied before.
4f	Community safety		+					Reduce anti social behaviour, increase contact with substance misusers and tackle general disorder.
4g	Waste disposal		+					ALS applies standards to refuse.
4h	Road hazards	++						Could identify areas of high HMO density and flag up road safety issues.
4i	Injury hazards	++						Improves fire safety and Housing Health and Safety Rating System (HHSRS) standards.
4j	Quality and safety of play areas		+					The external of a property will be inspected. In addition, as children are a vulnerable group, they need to be considered under the HHSRS.

What contribution does this activity make to:		Expected effect of activity :						Supporting Evidence / Effect on Inequality:
5. Economic conditions affecting health?		++	+	Neutral	-	--	N/A	
5a	Unemployment and / or Economic inactivity		+					Assisting Landlords who are thinking about converting or buying properties for HMOs.
5b	Income				-			License fee may discourage landlords from having or developing HMOs. Increasing the rent and poor standard accommodation will not be tolerated. Landlords may need to spend in order to improve properties.

What contribution does this activity make to:		Expected effect of activity :						Supporting Evidence / Effect on Inequality:
5. Economic conditions affecting health?		++	+	Neutral	-	--	N/A	
5c	Type of employment		+					Presents an opportunity to develop HMOs and employment opportunities. HMOs fulfil an essential housing need.
5d	Workplace conditions						x	
5e	Procurement						x	

What contribution does this activity make to:		Expected effect of activity :						Supporting Evidence / Effect on Inequality:
6. Access and quality of services?		++	+	Neutral	-	--	N/A	
6a	Medical and Healthcare services		+					Early intervention by officers could aid referral to support services. Landlords to be informed about tenancy support services.
6b	Other caring services		+					Signposting people to more appropriate accommodation.
6c	Careers advice			x				
6d	Shops and commercial services						x	
6e	Public amenities						x	
6f	Transport						x	
6g	Education and training		+					Policy has the ability to target specific groups (landlords/tenants) through such thing as landlord's forums. Consider landlord information packs (SMAT).
6h	Information technology						x	

What contribution does this activity make to:		Expected effect of activity :						Supporting Evidence / Effect on Inequality:
7. Macro-economic, environmental and sustainability factors?		++	+	Neutral	-	--	N/A	
7a	Government policies		+					New housing policy recommends every landlord is accredited and enables better control.
7b	Gross Domestic Product			x				Knowledge about incentives and schemes to improve properties.
7c	Economic development (rural & urban)			x				Increased knowledge about HMO areas could influence policy.
7d	Social Justice and Equality issues		+					More awareness about racism and equality issues.
7e	Biological diversity						x	
7f	Climate						x	
7g	Bilingualism and the Welsh Culture		+					Information pack could increase cultural awareness.

### Section 3

Other Impact Assessments							
	Stage working on -	Screening	Scoping	Assessment	Recommendations	Monitoring & evaluation	Comments/Recommendations
Health Impact Assessment		✓	✓	✓	✓	x	Few minor alterations to document.
Strategic Environmental Assessment		x	x	x	x	x	
Equality Impact Assessment		x	x	x	x	x	
Environmental Assessment		x	x	x	x	x	

## HIA Summary Output

The results below represent the agreed outcomes of Additional licensing scheme being tested against the Health Impact Assessment Tool that involved representatives from Environmental Health department, Housing and Social Services department and Managing director department. Those representatives agree this is an accurate overview of their collective comments.

**Key:** ++ Very Positive, + Positive, NEUT Neutral, - Negative, -- Very Negative, N/A Not Applicable

<b>HIA Category</b>	<b>Overall Contribution</b>						<b>Explanation</b>
1. Vulnerable groups	++ <input type="checkbox"/>	+ <input checked="" type="checkbox"/>	NEUT <input type="checkbox"/>	- <input type="checkbox"/>	-- <input type="checkbox"/>	N/A <input type="checkbox"/>	The policy would help to protect younger people living within HMOs that witness antisocial behaviour. As officers will be able to assess situations in HMOs and intervene earlier in issues.
2. Individual Lifestyles	++ <input type="checkbox"/>	+ <input checked="" type="checkbox"/>	NEUT <input type="checkbox"/>	- <input type="checkbox"/>	-- <input type="checkbox"/>	N/A <input type="checkbox"/>	Enforcement of minimum standards such as for food preparation and overcrowding, could aid in controlling and perhaps preventing risk taking behaviour and discourage such things as sexual abuse.
3. Social and community influences on health	++ <input type="checkbox"/>	+ <input checked="" type="checkbox"/>	NEUT <input type="checkbox"/>	- <input type="checkbox"/>	-- <input type="checkbox"/>	N/A <input type="checkbox"/>	The policy and officer contact will encourage a minimum standard, that will help to flag up areas of anti social behaviour, identify social problems, control over crowding and improve sense of belonging. In addition, aid in easing neighbour/ tenant tension, empower tenants and educating, supporting and, providing information to landlords and tenants.
4. Living/environmental conditions affecting health	++ <input type="checkbox"/>	+ <input checked="" type="checkbox"/>	NEUT <input type="checkbox"/>	- <input type="checkbox"/>	-- <input type="checkbox"/>	N/A <input type="checkbox"/>	Through working with other departments such as planning and building control, clarity of what a HMO is can be achieved. As well as tackling wider issues such as refuse and car parking issues. The policy will also aid in driving up standards and will help to reduce noise complaints and antisocial behaviour. In addition, through driving up standards, fire safety and HHSRS standards will be improved.
5. Economic conditions affecting health	++ <input type="checkbox"/>	+ <input checked="" type="checkbox"/>	NEUT <input type="checkbox"/>	- <input type="checkbox"/>	-- <input type="checkbox"/>	N/A <input type="checkbox"/>	The scheme presents an opportunity to develop HMOs and can assist landlords who are thinking about converting properties, so that the HMOs meet standards.
6. Access and quality of services	++ <input type="checkbox"/>	+ <input checked="" type="checkbox"/>	NEUT <input type="checkbox"/>	- <input type="checkbox"/>	-- <input type="checkbox"/>	N/A <input type="checkbox"/>	Through contact with tenants and landlords, officers are able to intervene early and aid referral if there are any issues. In addition, they will be able to signpost individuals to more appropriate accommodation and tackle specific groups, through educating and training.
7. Macro-economic, environmental and sustainability factors	++ <input type="checkbox"/>	+ <input checked="" type="checkbox"/>	NEUT <input type="checkbox"/>	- <input type="checkbox"/>	-- <input type="checkbox"/>	N/A <input type="checkbox"/>	New housing policy recommends landlords are accredited, which aids in better control. In addition, increasing knowledge about HMOs and schemes to help landlords improve their property.

**Summary Comments:** (Indicate that this is a general summary, but also indicate any significant disagreements that may have arisen during testing)

The Additional Licencing Scheme would help to protect younger people living within HMOs that witness antisocial behaviour. As officers will have greater contact with HMOs they should be able to intervene earlier in issues. The enforcement of minimum standards such as for food preparation and overcrowding, could aid in controlling and perhaps preventing risk taking behaviour.

The policy and officer contact will encouraging a minimum standard, that will help to flag up areas anti-social behaviour, identify social problems, control over crowding and improve sense of belonging. In addition, it should also aid in easing neighbour/tenant tension. The Additional Licencing scheme should also empower tenants and help to educate / support landlords e.g. through providing information packs.

By working with other departments such as planning and building control, clarity on what constitutes a HMO can be achieved. As well as tackling wider issues such as refuse and car parking issues. The policy will also aid in driving up standards and will help to reduce noise complaints and ant-social behaviour generally within communities. In addition, fire safety and Housing Health and Safety Standards will be improved.

The scheme presents an opportunity to raise awareness about the need for HMOs and can assist landlords who are thinking about converting properties.