

Customer Access Review – Full Assessment

| Assessment details | |
|---|---|
| Assessment area | Houses in Multiple Occupation (HMO) Policy |
| Date of assessment | November 2025 |
| Directorate and Service | Housing and Public Protection, Housing Services |
| Manager | Housing Solutions & Private Sector Manager |
| Officer conducting assessment | Housing Policy & Performance Officer |
| Step 1: Scoping the assessment | |
| 1. What are the aims and objectives of the activity or proposal? | <p>The Houses in Multiple Occupation (HMO) Policy sets out the standards an HMO is required to meet, the licensing requirements for HMOs and the Council's enforcement approach should there be non-compliance with the required standards.</p> <p>The Policy aims to set out the responsibilities of the Council's Housing Service to licence HMOs where required and the requirements of the Council when enforcement action is needed.</p> |
| 2. Who will be affected by the activity or proposal? | Residents in the borough including occupants of HMOs. |
| 3. How does the activity or proposal contribute to: a) any key performance indicators? b) policies, values or objectives of Dartford Borough Council? | <p>The Houses in Multiple Occupation (HMO) Policy contributes towards the following Corporate Plan housing ambitions:</p> <ul style="list-style-type: none"> • Support a strong, high quality, private rented sector by driving up standards and cracking down on bad landlords and ensuring those residents paying private management fees are treated fairly. • In a planning system dominated by national policies and rules, we will nevertheless use the powers we do have to protect and enhance the interests of local communities. <p>There are no key performance indicators specific to the Houses in Multiple Occupation (HMO) Policy.</p> |
| 4. Which aspects of the activity or proposal are dictated by legislation/regulation and where do we have discretion in how they are delivered? | <p>The Houses in Multiple Occupation (HMO) Policy and its delivery is intended to be compatible with the following relevant legislation and regulation:</p> <ul style="list-style-type: none"> • Housing Act 2004 • Housing and Planning Act 2016 • Regulatory Reform (Fire Safety) Order 2005 • The Management of Houses in Multiple Occupation (England) Regulations 2006 • The Licensing and Management of HMOs (Additional Provisions) (England) Regulations 2007 • Houses in Multiple Occupation and residential property licensing reform: Guidance for Local Housing Authorities |

Customer Access Review – Full Assessment

| Step 2: Information collection | |
|--|---|
| <p>5. What do you know about the groups of people who will be affected? (i.e. demographic information in relation to the protected characteristic groups of age, disability, pregnancy and maternity, religion or belief, race, sex, sexual orientation, gender reassignment, marriage and civil partnership)</p> | <p><u>Dartford Population Profile</u></p> <ul style="list-style-type: none"> • Gender – There are slightly more female residents than male residents in Dartford where 51% are female and 49% are male, which is the same as the overall England ratio of females and males. • Age – The median age in Dartford is 37 years, which is slightly lower than the overall England mean age of 40 years. 21.1% of Dartford's population is aged 14 years or under. This is followed by residents aged 35 to 44 years (15.7%), 25 to 34 years (15.2%), 45 to 54 years (13.3%), 55 to 64 years (10.8%), 15 to 24 years (10.2%), 65 to 74 years (7.4%), and aged 75 years and over (6.4%) • Ethnicity – The largest ethnic group that people in Dartford identify with is White at 74.5%. This is followed by Black, Black British, Black Welsh, Caribbean or African (10.50%), Asian, Asian British or Asian Welsh (9.90%), Mixed or Multiple ethnic groups (3.10%), and Other ethnic groups (2.00%) • Disability – 15.9% of Dartford's population are disabled. Of this, 6.6% of people's activities are limited a lot and 9.3% of people's activities are limited a little. • Religion – 48.1% of Dartford's population connect or identify with the Christian religion, followed by 3.8% Hindu, 3.5% Muslim, 1.7% Sikh, 0.6% Buddhist, 0.1% Jewish, and 0.4% other religion. 36.5% of Dartford's population did not connect or identify with any religion and 5.3% did not answer this question in the Census. • Sexual orientation – 91.2% of Dartford's population aged 16 years and over identified as straight or heterosexual. 1.5% described themselves as gay or lesbian. 0.91% described themselves as bisexual. 0.14% described themselves as pansexual; 0.03% described themselves as asexual; 0.00% described themselves as queer. 0.01% described themselves as 'other sexual orientation'. 6.54% did not answer this question in the Census. <p>(Source: Census 2021, Office for National Statistics)</p> |
| <p>6. What consultation has taken place with affected groups? Please describe who was consulted and the key findings</p> | <p>Internal consultation on the draft Houses in Multiple Occupation (HMO) Policy has been carried out with Council officers in the Housing Service.</p> |

Customer Access Review – Full Assessment

| Step 2: Information collection | |
|--|---|
| <p>7. Are there any gaps in information? If so, what additional research and/or consultation is needed to ensure that affected groups needs and views are taken into account?</p> | <p>Residents in the borough will be invited to comment on the policy. Consultation with residents will be undertaken, as follows:</p> <ol style="list-style-type: none"> 1. All residents will be invited to comment on the draft Houses in Multiple Occupation (HMO) Policy. 2. The Dartford Tenants' and Leaseholders' Forum (DTLF) will be invited to comment on the draft Houses in Multiple Occupation (HMO) Policy. The DTLF aims to ensure that the services delivered by the Council are accessible to all. The Forum works as a group to ensure that the views and housing needs of residents are recognised and addressed by the Council, and that those needs and views are placed at the centre of housing services delivery. 3. The Housing Advisory Board (HAB) will be invited to comment on the draft Houses in Multiple Occupation (HMO) Policy. The HAB considers reports on proposed policy, strategy and performance in relation to housing issues and makes recommendations to Cabinet as appropriate. The HAB includes representation from Council officers, elected Members and DTLF members. |

| Step 3: Assessing the equality impact | |
|--|--|
| <p>8. Consider whether the activity or proposal has or will have any positive or negative equality impacts on the protected characteristic groups in relation to the following aims of the Public Sector Equality Duty:</p> <p>a) tackling unlawful discrimination b) promoting equality of opportunity c) promoting good relations</p> <p><u>NOTES:</u></p> <ul style="list-style-type: none"> • The Initial Screening will have identified which aims of the Public Sector Equality Duty are relevant to the activity or proposal for consideration • For existing activities, consider how they are working in practice for each relevant protected group • For new proposals, consider whether there is anything that could give rise to positive and negative equality impacts for each relevant protected group • If there is no identified equality impact, please tick the 'No Impact' box and explain why in question 9 • If the equality impact is unclear, please tick the 'Unknown' box and explain why in question 9 | |

| Step 3: Assessing the equality impact | | | | |
|---------------------------------------|---|------------------|-------------------------------------|--------------------------|
| PROTECTED CHARACTERISTIC | POSITIVE IMPACTS | NEGATIVE IMPACTS | NO IMPACT | UNKNOWN |
| Age | Although HMOs are occupied by people from diverse groups, HMOs are often occupied by students and young graduates for affordability | | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Customer Access Review – Full Assessment

| Step 3: Assessing the equality impact | | | | |
|---------------------------------------|---|---|-------------------------------------|--------------------------|
| PROTECTED CHARACTERISTIC | POSITIVE IMPACTS | NEGATIVE IMPACTS | NO IMPACT | UNKNOWN |
| | reasons. However, the Policy will not have a negative impact due to age. | | | |
| Disability | | | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Sex | | | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Gender reassignment | | | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Race | | | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Religion/Belief | | | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Sexual Orientation | | | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Pregnancy/Maternity | | | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Marriage and Civil Partnership* | Not applicable as the Policy does not apply in the context of employment. | Not applicable as the Policy does not apply in the context of employment. | <input type="checkbox"/> | <input type="checkbox"/> |

* Regarding the protected characteristic of Marriage and Civil Partnership – public bodies need to comply with the first aim of the Public Sector Equality Duty and only in the context of employment.

| Step 3: Assessing the equality impact | |
|---|---|
| 9. If 'no impact' or 'unknown' was selected, please explain | The Policy does not have an impact on any of the protected characteristic groups. The Council will liaise and deal with landlords appropriately and based on the circumstances of each individual case. The Council will act in compliance with the measures as set out in the Policy and the enforcement measures (where necessary) and will act accordingly, irrespective of any protected characteristics. |
| 10. If Dartford Borough Council works with partners to deliver the activity or proposal, please describe any circumstances that could give rise to positive or negative equality impacts between different groups | None known. |
| 11. Any other comments | |

Customer Access Review – Full Assessment

Step 4: Action plan

12. Based on the information in Steps 1 to 3, please list the actions that will be taken to address:

- a) any gaps in information and consultation
- b) how any negative impacts on equality will be mitigated or eradicated

a) If additional information and/or consultation is required or the impact is still unclear, what actions will you put in place to gather the information you need?

| Information needs | Action | Intended outcome | Date for completion | How this will be monitored | Responsible officer |
|--|---|--|-----------------------|--|--------------------------------------|
| Views from the Council's Planning Services team | Invite comment and input on the draft Houses in Multiple Occupation (HMO) Policy from Planning Services | Feedback will, at a formative stage, inform any further changes that may be required to the draft Policy in advance of seeking approval for the Policy | December/January 2026 | Details of the consultation and amendments made to the draft Policy as a result of the consultation will be included in the Cabinet report | Housing Policy & Performance Officer |
| Views from all residents in the borough | Invite comment and input on the draft Houses in Multiple Occupation (HMO) Policy from all residents | Feedback will, at a formative stage, inform any further changes that may be required to the draft Policy in advance of seeking approval for the Policy | December/January 2026 | Details of the consultation and amendments made to the draft Policy as a result of the consultation will be included in the Cabinet report | Housing Policy & Performance Officer |
| Views from the Dartford Tenants' and Leaseholders' Forum | Invite comment and input on the draft Houses in Multiple Occupation (HMO) Policy from the Dartford Tenants' and Leaseholder's Forum | Feedback will, at a formative stage, inform any further changes that may be required to the draft Policy in advance of seeking approval for the Policy | December/January 2026 | Details of the consultation and amendments made to the draft Policy as a result of the consultation will be included in the Cabinet report | Housing Policy & Performance Officer |
| Views from the Housing Advisory Board | Invite comment and input on the draft Houses in Multiple Occupation (HMO) | Feedback will, at a formative stage, inform any further changes that may be required to the | February 2026 | Details of the consultation and amendments made to the draft Policy as a result of the consultation will be | Housing Policy & Performance Officer |

Customer Access Review – Full Assessment

| Information needs | Action | Intended outcome | Date for completion | How this will be monitored | Responsible officer |
|-------------------|--|--|---------------------|--------------------------------|---------------------|
| | Policy from the Housing Advisory Board | draft Policy in advance of seeking approval for the Policy | | included in the Cabinet report | |

b) If any negative impacts on equality were found, what actions will you put in place to mitigate or eradicate these impacts?

| Identified impacts (and who is affected) | Action | Intended outcome | Date for completion | How this will be monitored | Responsible officer |
|--|--------|------------------|---------------------|----------------------------|---------------------|
| | | | | | |
| | | | | | |
| | | | | | |

Step 5: Decision making and future monitoring

| | |
|--|---|
| 13. Which decision making process does this Customer Access Review need to go through? i.e. who does this need to be approved by? | Head of Legal Services & Director of Housing and Public Protection |
| 14. Is the subject of the Customer Access Review going to committee? If yes, include your findings in the committee report and attach this assessment to the report | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 15. How will you continue to monitor the activity or proposal on protected characteristic groups? | The Houses in Multiple Occupation (HMO) Policy will be reviewed every three years, or in the event of major legislative or operational change. |
| 16. When will you review this Customer Access Review? | The Policy will be reviewed at the end of the three year period, where a new Customer Access Review assessment will be undertaken in conjunction with the review. |

Step 6: Final steps

| |
|---|
| 17. Once this Customer Access Review has been approved, send this assessment to the Policy & Projects Officer. |
| 18. Implement the actions identified from this Customer Access Review and ensure progress is monitored and recorded. |

Customer Access Review – Full Assessment

Reviewed by Legal Services:

J.Wenham

08.12.2025

Reviewed by Director of Housing & Public Protection:



5.12.2025