Lisburn & Castlereagh City Council

Section 75 Equality and Good Relations Screening template

Part 1. Information about the activity/policy/project being screened:

Name of the activity/policy/project Landlord Registration Scheme

> The functions relating to the registration of landlords who provide accommodation within NI's private rented sector are being transferred from the Department for Communities to the local councils. Lisburn and Castlereagh Council are the lead council who will host the new service on a regional basis.

- The Landlord Registration Scheme is a regulated function and consists of a single database detailing the landlords and the properties they rent. Tenants can check if a property is registered using a restricted public search function.

Is this activity/policy/project – an existing one, a revised one, a new one?
This scheme already exists within the Department for Communities but as it is transferring to local councils (with LCCC being the lead council) it is new to the Council.

What are the intended aims/outcomes the activity/policy/project is trying to achieve?

To increase compliance with the Landlord Registration Scheme by using knowledge gathered at a local level of council to target unregistered landlords.

To educate those landlords who are unaware of the requirement to register by promoting the scheme.

To assist landlords and tenants with their rights and responsibilities, including the registration process, by providing clear information on the new LRS website.

Further to regulation change being brought forward by DfC, this scheme could be used to improve standards within the private rented sector with the revenue received from the registration fee used to resource this aim.

Who is the activity/policy/project targeted at and who will benefit? Are there any expected benefits for specific Section 75 categories/groups from this activity/policy/project? If so, please explain.

The project is not targeting any specific Section 75 groups but through engagement with stakeholders it is anticipated that the improved registration process will provide benefits for particular equality groups e.g. users with a disability or those within the age category.

Who initiated or developed the activity/policy/project?

This project was initiated by officers within the Department for Communities and the proposal for transferring the scheme to local councils was agreed at SOLACE. Following agreement that Lisburn & Castlereagh City Council would be the lead council for this project, the Chief Executive sought approval by the Environment & Sustainability Committee to appoint a Project Management Officer to deliver this project.

When the final transfer of functions occurs, this will be delivered by the Landlord Registration Team based at LCCC, who would report to the Head of Environmental Health, Risk and Emergency Planning.

Who owns and who implements the activity/policy/project?

The Project Management Officer will own and implement the delivery of the project with the Landlord Registrar being the owner of the scheme post transfer of functions. A Programme Board consisting of LCCC and DfC officers along with an independent member from Belfast City Council was established to provide a governance and decision-making role.

Are there any factors which could contribute to/detract from the intended aim/outcome of the activity/policy/project?

Yes.

If yes, give brief details of any significant factors.

Financial – Yes.

Contribute:

The transfer of functions associated with this project has been funded by DfC. Business cases requesting funding have been secured and this funding will provide assurances for delivery of the aims associated with the transfer e.g. a bespoke IT system, advertising to promote the need to register and the ability of a tenant to use the public search functionality etc.

Detract:

This is a cost neutral scheme (i.e. there will be no cost to any council for the implementation of this scheme) and therefore should there be any regulation change that requires the LRS team or any council to provide more resources to deliver these changes then, this will need to be provided from the registration fee, which is subject to regulation reform also.

Legal – Yes.

Contribute:

Legal advice will be required on a number of areas (contracts, data sharing agreements, privacy notices etc.) and a budget has been set for this advice.

Detract:

To make landlord registration a more meaningful tool, regulatory reform will be required, and this will be delivered through the DfC. This is outside the control of councils and may impact on the aims being met long term.

Other – Yes.

Detract:

Buy in from all NI Councils and stakeholders being limited or not as expected.

Ability to identify unregistered landlords will be challenging.

Who are the internal and external stakeholders (actual or potential) that the activity/policy/project will impact upon?

Staff

- Landlord Registration team within LCCC including Head of Environmental Services, Risk & Emergency Planning.

Service users
- Landlords
- Tenants
- Call centre agents at NI Direct
- Enforcement Officers
- Estate Agents

Other public sector organisations
- All NI Councils, including HMO Unit in Belfast City Council
- Department for Communities Officers including Housing Branch team, those who administer Welfare Supplementary and Universal Credit Payments
- Department of Finance for the purpose of its functions under the Rates
- Northern Ireland Housing Executive for the purposes of the administration of housing benefit
- PSNI

Voluntary/community/trade unions
- Housing Rights

Other
- NI Direct Call Centre
- Cranmore Consulting Ltd (contractor providing IT solution)

Other policies/strategies/plans with a bearing on this activity/policy/project

Name of policy/strategy/plan	Who owns or implements?
Lisburn & Castlereagh City Council Equality Scheme - Equality Scheme - lisburncastlereagh.gov.uk Chapter 6 Our arrangements for ensuring and assessing public access to information and services we provide	LCCC
Section 75 Screening for Transfer of the Landlord Registration Scheme (DfC) Transfer of the Landlord Registration Scheme - screening | Department for Communities	DfC

Various pieces of legislation relating to Private Tenancies Act (NI) 2002 [Private rented sector | Department for Communities](#)	DfC
Draft Programme for Government – Our Plan: Doing What Matters Most Specifically 'Provide More Social, Affordable and Sustainable Housing' [Our Plan: Doing What Matters Most](#)	The Executive Office
Project Initiation Document for the Programme Board along with the project plan.	Landlord Registration Scheme Transfer Programme Board
[The Landlord Registration Scheme Regulations (Northern Ireland) 2014](#). This legislation outlines what data can be collected, how it will be used and who can access it.	DfC

Available evidence:

What evidence/information (qualitative and quantitative) have you gathered or considered to inform this activity/policy? Specify details for each Section 75 category.

As part of this project the following evidence/information has been gathered to inform this project, by DfC and LCCC officers:

- Stakeholder engagement with end users
- Information gathering from other regions that operate similar schemes to learn from their successes and improvements required
- Census data provided by DfC's statistics team (detailed below under each heading)
- Further to the Census figures, information on a sample of Private Rented Sector tenants can be found in the NIHE House Condition Survey 2016 ([House Condition Survey Main Report 2016 (nihe.gov.uk)](#))
- Survey of landlords undertaken by DfC in 2024

From this evidence, the registration scheme does not appear to impact negatively on any S75 group as there are no specific barriers that prevents someone from becoming a landlord or to register, however, there are some better practices that will be adopted as part of this project to assist some groups with the registration process which is detailed under **2(a) Are there opportunities to better promote equality of opportunity for people within the Section 75 equality categories?**.

Data gathered from census has shown that the private rented sector has grown in size and importance in recent decades. Over the last forty years (1981 to 2021) the percentage of

households privately renting has nearly doubled (from 9.1% of households in 1981 to 17.2% in 2021). In 2021 approximately 307,300 people lived in 132,400 privately rented households.

At November 2024, 40,000 landlords had registered on the database and had provided information on 78,000 properties.

Almost half (48%) of those in the private rented sector receive state financial support via Housing Benefit or Universal Credit (UC).

The website will provide a range of information useful for both landlords and tenants. Following discussion with stakeholders, the website will be designed to allow the URL to be entered into translate services, such as Google, so the information can be better understood by non-English speaking service users.

Most up to date NISRA population data from Census 2021 (published 22/09/22) Lisburn and Castlereagh Census Data

Section 75 Category	Details of evidence/information
Religious Belief	The 2021 Census figures show that of 307,274 persons living private rented accommodation, 42.6% are Catholic, 27.1% are Protestant or other Christian, 2.7% are other religion with 27.6% as no religion or religion not stated.
Political Opinion	The 2021 Census did not ask about political opinion, therefore the latest evidence available is the NIHE House Condition Survey 2016.
Racial Group	The 2021 Census figures show that of 307,274 persons living private rented accommodation, 92.2% are White, 3.6% are Asian, 1.8% are Black, 1.5% are mixed with 1% as other, not stated.
Age	The 2021 Census figures show that of 307,274 persons living private rented accommodation, 26% are aged between 0-15, 14.1% between 16-24, 20.7% between 25-34, 15.9% between 35-44, 10.6% between 45-54, 6.9% between 55-64 and 5.7% 65+. From discussions with landlords, call centre agents and enforcement officers users, some would find it preferable if some older landlords or those who are unfamiliar with technology could nominate a representative at time of the registration.
Marital Status	The 2021 Census figures show that of 227,261 persons over the age of 16 living private rented accommodation, 56.3% are single, 25.8% are married or in a civil partnership, 4.8% are separated, 6.3% are divorced or were previously in a civil partnership, 2.1% are widowed or a surviving civil partner.

Sexual Orientation	The 2021 Census figures show that of 227,261 persons over the age of 16 living private rented accommodation, 85.9% are straight or heterosexual, 4.4% are gay, lesbian, bisexual or other sexual orientation and 7.2% prefer not to say/or did not state.
Men & Women Generally	The 2021 Census figures show that of 307,274 persons living private rented accommodation, 49.4% are male and 50.6% are female.
Disability	The 2021 Census figures show that of 307,274 persons living private rented accommodation, 20.2% have a disability which limits day to day activities and 79.8% do not have a disability which limits day to day activities.
People with and without Dependants	The 2021 Census figures show that of 307,274 persons living private rented accommodation,50.2% have dependent children and 49.8% do not have dependent children.

Note to reader - If you are aware of and would like the Landlord Registration Team to take into account any further evidence or information relevant to this policy, please send this to
landlordregistrationni@lisburncastlereagh.gov.uk.

Needs, experiences and priorities

Taking into account the information referred to above, what are the different needs, experiences and priorities of each of the following categories, in relation to the particular activity/policy/decision? Specify details for each of the Section 75 categories

Section 75 Category	Details of needs/experiences/priorities
Religious Belief	No evidence of specific needs identified in relation to this project/policy.
Political Opinion	
Racial Group	The long-term intention of the transfer, subject to regulation change, is to improve standards in the private rented sector. Increased compliance with the requirement to register will mean an increase in revenue for councils which can be used to increase resources to effectively target enforcement of the legislation.
Age	
Marital Status	
Sexual Orientation	
Men & Women Generally	All Section 75 categories need good quality affordable housing which is safe and secure.
Disability	
People with and without Dependants	An increase in standards across the sector will benefit all categories living in the private rented sector.

Part 2. Screening questions

1 What is the likely impact on equality of opportunity for those affected by this activity/policy, for each of the Section 75 equality categories?

Section 75 Category	Details of likely impact – will it be positive or negative? If none anticipated, say none	Level of impact - major or minor* - see guidance below
Religious Belief	We do not expect there to be any adverse impacts on equality of opportunity for people within this group.	None
Political Opinion	We do not expect there to be any adverse impacts on equality of opportunity for people within this group.	None
Racial Group	We do not expect there to be any adverse impacts on equality of opportunity for people within this group.	None

Age	We do not expect there to be any adverse impacts on equality of opportunity for people within this group.	None
Marital Status	We do not expect there to be any adverse impacts on equality of opportunity for people within this group.	None
Sexual Orientation	We do not expect there to be any adverse impacts on equality of opportunity for people within this group.	None
Men & Women Generally	We do not expect there to be any adverse impacts on equality of opportunity for people within this group.	None
Disability	We do not expect there to be any adverse impacts on equality of opportunity for people within this group.	None
People with and without Dependants	We do not expect there to be any adverse impacts on equality of opportunity for people within this group.	None

* See Appendix 1 for details.

2(a) Are there opportunities to better promote equality of opportunity for people within the Section 75 equality categories?

Section 75 Category	IF Yes, provide details	If No, provide details
Religious Belief		No opportunities identified in relation to this project for any of this group.
Political Opinion		No opportunities identified in relation to this project for any of this group.
Racial Group		No opportunities identified in relation to this project for any of this group.
Age	Through evidence gathered, it was suggested that for landlords who are older and may not be competent in using IT systems or wish to ask someone else to speak with call agents or the Landlord Registrar on their behalf,	

	that additionality functionality will be added to the registration process allowing the landlord to nominate a representative to act on their behalf. This suggestion has been accepted and will be added to the development of the IT system. In addition to the IT system being available for the registration process, landlords can use the telephone registration process or provide a hard copy registration.	
Marital Status		No opportunities identified in relation to this project for any of this group.
Sexual Orientation		No opportunities identified in relation to this project for any of this group.
Men & Women Generally		No opportunities identified in relation to this project for any of this group.
Disability	With the introduction of Web Content Accessibility Guidelines (WCAG) that require all public bodies to ensure the information is accessible for all users, the current system owned by DfC has been upgraded to meet these guidelines. As a new bespoke IT system will be developed for the transfer of functions to local councils, the opportunity to create a website that is built with accessibility in mind has been taken to ensure it meets a minimum standard of WCAG 2.2AA. A full independent accessibility audit will be carried out at the end of the delivery of the IT System. This will be beneficial to landlords and tenants who will be checking the public search facility. In addition to the IT system being available for the registration process, landlords can use the telephone registration process or provide a hard copy registration.	

People with and without Dependants		No opportunities identified in relation to this project for any of this group.

Equality Action Plan 2021-2025

Does the activity/policy/project being screened relate to an action in the Equality Action Plan 2021-2025? No

2(b) DDA Disability Duties (see Disability Action Plan 2021-2025)

Does this policy/activity present opportunities to contribute to the actions in our Disability Action Plan:

- to promote positive attitudes towards disabled people?
- to encourage the participation of disabled people in public life?

No

3 To what extent is the activity/policy/project likely to impact on good relations between people of different religious belief, political opinion or racial group?

Good Relations Category	Details of likely impact. Will it be positive or negative?	Level of impact – minor/major*
Religious Belief	None	
Political Opinion	None	
Racial Group	None	

*See Appendix 1 for details.

4 Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?

Good Relations Category	IF Yes, provide details	If No, provide details
Religious Belief		Religious belief not relevant to registering as a landlord.
Political Opinion		Political Opinion not relevant to registering as a landlord.
Racial Group		Racial Group not relevant to registering as a landlord.

Multiple identity

Provide details of any data on the impact of the activity/policy/project on people with multiple identities. Specify relevant Section 75 categories concerned.

None.

Part 3. Screening decision/outcome

Equality and good relations screening is used to identify whether there is a need to carry out a **full equality impact assessment** on a proposed policy or project. There are 3 possible outcomes:

1) **Screen out** - no need for a full equality impact assessment and no mitigations required because no relevance to equality, no negative impacts identified or only very minor positive impacts for all groups. This may be the case for a purely technical policy for example.
2) **Screen out with mitigation** - no need for a full equality impact assessment but some minor potential impacts or opportunities to better promote equality and/or good relations identified, so mitigations appropriate. Much of our activity will probably fall into this category.
3) **Screen in for full equality impact assessment** – potential for significant and/or potentially negative impact identified for one or more groups so proposal requires a more detailed impact assessment. [See Equality Commission guidance on justifying a screening decision.]

Choose only one of these and provide reasons for your decision and ensure evidence is noted/referenced for any decision reached.

Screening Decision/Outcome	Reasons/Evidence
Option 1 **Screen out** – no equality impact assessment and no mitigation required [go to Monitoring section]	
Option 2 **Screen out with mitigation** – some potential impacts identified but they can be addressed with appropriate mitigation or some opportunities to better promote equality and/or good relations identified [complete mitigation section below]	From this evidence, it has been understood that the registration scheme does not negatively impact on any S75 group as there are no specific barriers that prevents someone from becoming a landlord or to register, however, there are some better practices that will be adopted as part of this project to assist some groups with the registration process. This will include building a website and registration portal with accessibility at the forefront to improve the usability of the online system for users with disabilities. To assist with landlords, perhaps those who fall into the age category of S75, who are unfamiliar with technology or would rather have someone else act on their behalf, will have the option to

	nominate a representative at time of the registration.
	There are three options to register to this scheme and they are open to all users – online registration via the portal (£70), registration via a call centre (£70) and hard copy form registration (£80).
Option 3 **Screen in** for a full Equality Impact Assessment (EQIA) [If option 3, complete timetabling and prioritising section below]	

Mitigation (Only relevant to Option 2)

Can the activity/policy/project plan be amended or an alternative activity/policy introduced to better promote equality of opportunity and/or good relations? If so, give the **reasons** to support your decision, together with the proposed changes/amendments or alternative activity/policy and ensure the mitigations are included in a revised/updated policy or plan.

Yes - This will include building a website and registration portal with accessibility at the forefront to improve the usability of the online system for users with disabilities.

To assist with landlords, perhaps those who fall into the age category of S75, who are unfamiliar with technology or would rather have someone else act on their behalf, will have the option to nominate a representative at time of the registration.

These mitigations have been accepted and will be included in the development of the website and registration portal and processes for the new system.

Timetabling and prioritising for full EQIA (only relevant to Option 3)

If the activity/policy has been **'screened in'** for full equality impact assessment, give details of any factors to be considered and the next steps for progressing the EQIA, including a proposed timetable.

Is the activity/policy affected by timetables established by other relevant public authorities? Yes/No.   If yes, please provide details.
Not applicable.

Part 4. Monitoring

Public authorities should consider the guidance contained in the Commission's Monitoring Guidance for Use by Public Authorities (July 2007).

Effective monitoring will help a public authority identify any future adverse impact arising from the activity/policy which may lead the public authority to conduct an equality impact assessment, as well as help with future planning and activity/policy development.

What will be monitored and how? What specific equality monitoring will be done? Who will undertake and sign-off the monitoring of this activity/policy and on what frequency? Please give details:

This project and the transfer of functions will see the activity generally monitored as part of normal review and evaluation or service improvement. This will be carried out by the Landlord Registration team who will seek opinions from users through constant engagement with the end users, particularly in years 2025/26 and 2026/27. This will be carried out by in person discussions, comment sections and surveys being shared with users. Any changes suggested will be reviewed and considered against the equality groups and if the changes are significant then a screening process will be undertaken again. This will be signed off by the Head of Environmental Health, Risk and Emergency Planning.

Part 5 - Approval and authorisation

		Position/Job Title	Date
Screened by:	Maria Curran	PMO/Landlord Registrar	21/01/2025
Reviewed by:	Annie Wilson	Equality Officer	23/01/2025
Approved by:	Sally Courtney	Head of Service (Acting), Environmental Health, Risk and Emergency Planning	28/01/2025

Note: On completion of the screening exercise, a copy of the completed Screening Report should be:

- approved and 'signed off' by a senior manager responsible for the activity/policy
- included with Committee reports, as appropriate
- sent to the Equality Officer for the quarterly screening report to consultees, internal reporting and publishing on the LCCC website
- shared with relevant colleagues
- made available to the public on request.

Evidence and documents referenced in the screening report should also be available if requested.

Appendix 1 – Equality Commission guidance on equality impact

*Major impact:

a) The policy/project is significant in terms of its strategic importance;
b) Potential equality matters are unknown, because, for example, there is insufficient data upon which to make an assessment or because they are complex, and it would be appropriate to conduct an equality impact assessment in order to better assess them;
c) Potential equality and/or good relations impacts are likely to be adverse or are likely to be experienced disproportionately by groups of people including those who are marginalised or disadvantaged;
d) Further assessment offers a valuable way to examine the evidence and develop recommendations in respect of a policy about which there are concerns amongst affected individuals and representative groups, for example in respect of multiple identities;
e) The policy is likely to be challenged by way of judicial review;
f) The policy is significant in terms of expenditure.

Minor impact

a) The policy is not unlawfully discriminatory and any residual potential impacts on people are judged to be negligible;
b) The policy, or certain proposals within it, are potentially unlawfully discriminatory, but this possibility can readily and easily be eliminated by making appropriate changes to the policy or by adopting appropriate mitigating measures;
c) Any asymmetrical equality impacts caused by the policy are intentional because they are specifically designed to promote equality of opportunity for particular groups of disadvantaged people;
d) By amending the policy there are better opportunities to better promote equality of opportunity and/or good relations.

No impact (none)

a) The policy has no relevance to equality of opportunity or good relations;
b) The policy is purely technical in nature and will have no bearing in terms of its likely impact on equality of opportunity or good relations for people within the equality and good relations categories.

Updated Template @ Oct 2022