

## Equality, Fairness and Rights Impact Assessment

The purpose of this assessment is to consider how your policy could impact on the needs of those protected by the Public Sector Equality Duty, the Fairer Scotland Duty and the UN Convention of the Rights of the Child.

- [Public Sector Equality Duty](#)
- [Fairer Scotland Duty](#)
- [United Nations Convention of the Rights of the Child](#)

In making the assessment you must consider relevant evidence, including evidence received from equality groups. Having considered all of these elements, you must take account of the results of such assessments. This requires you to consider taking action to address any issues identified, such as removing or mitigating any negative impacts, where possible, and exploiting any potential for positive impact. If any adverse impact amounts to unlawful discrimination, the policy must be amended to avert this.

<b>Name of policy*:</b>	LICENSING OF SHORT TERM LETS (STLs)
<b>Completion date:</b>	5 <sup>th</sup> September 2022
<b>Completed by:</b>	Jillian McGrain
<b>Lead officer:</b>	JILLIAN MCGRAIN
<b>Department:</b>	ENVIRONMENT (HOUSING SERVICES)

*\*The term 'policy' should be understood as activity of East Renfrewshire Council i.e. all policies, provisions, criteria, functions, practices and activities including the delivery of services; essentially everything we do.*

**You should complete the Screening Section (1) to establish if a full assessment is required.**

## 1. Screening

<b>1.1 What is the nature of this policy?</b>
<input checked="" type="checkbox"/> Policy or Strategy <input type="checkbox"/> Programme or Plan <input type="checkbox"/> Project <input checked="" type="checkbox"/> Service or Function (Statutory) <input type="checkbox"/> Budget proposal <input type="checkbox"/> Another decision. Please state: <a href="#">Click or tap here to enter text.</a>
<input checked="" type="checkbox"/> New <input type="checkbox"/> Review or change to existing <input type="checkbox"/> Other. Please state: <a href="#">Click or tap here to enter text.</a>
<b>1.2 What would happen as a result of this policy? Select all that apply</b>
<input checked="" type="checkbox"/> Change to charging arrangements (including introduction, removal, increase or decrease) <input checked="" type="checkbox"/> Change to how a service is delivered (including addition, change or removal of practice/procedures/processes) <input type="checkbox"/> Change to options or entitlements <input type="checkbox"/> Change to priorities or criteria <input type="checkbox"/> Other. Please detail: <a href="#">Click or tap here to enter text.</a>
<b>1.3 How relevant is this policy to impact assessment?</b>
<input checked="" type="checkbox"/> The policy would have consequences for people (positive/neutral/negative) <input type="checkbox"/> The policy has potential to advance equality for people <input type="checkbox"/> The policy will affect children and young people up to the age of 18 <input type="checkbox"/> The policy has no impact on people
<b>1.4 What people would be affected?</b>
<input type="checkbox"/> East Renfrewshire Council employees <input type="checkbox"/> Organisations or individuals carrying out a service on behalf of the Council

- Voluntary sector groups/organisations
- ✓ People living in a specific area of East Renfrewshire. Please detail: Where higher numbers of STLs operate
- ✓ Everyone living in East Renfrewshire
- ✓ People working, studying or volunteering in East Renfrewshire
- ✓ Visitors to East Renfrewshire
- ✓ A group of people with a shared interest:
  - ✓ Experiencing socioeconomic disadvantage (this includes low/no wealth, low income, area deprivation or material deprivation)
  - ✓ Being in a particular age category
  - ✓ Being from a black or minority ethnic group e.g. Gypsy/Travellers
  - ✓ Speaking a language other than English
  - ✓ Women/girls
  - ✓ Identifying as Lesbian, Gay Bisexual or Transgender
  - ✓ Belonging to a particular religion or belief
  - ✓ Pregnant women or those on maternity/paternity leave
  - ✓ Having a long term limiting health condition or disability
  - ✓ Providing unpaid care for others
  - ✓ Another group e.g. those experiencing homelessness, offenders/ex-offenders. Please detail: homelessness
- ✓ Children and young people living in East Renfrewshire
- ✓ Children and young people using East Renfrewshire Council services
- ✓ Children and young people visiting East Renfrewshire
- None of the above

Review your answers above.

- If the policy has no impact on people, an impact assessment is not required. **GO TO SECTION 9**
- If the policy will have an impact on people, you should complete the full assessment. **GO TO SECTION 2**

## 2. The Assessment: Your scoping

<b>2.1 How long will this policy be in place and when is it scheduled for review?</b>
3 years – to be reviewed within 1 <sup>st</sup> year of licensing scheme being established.
<b>2.2 Are there known inequalities within the subject matter(s) of the policy?</b> For example: access to transport; organisational pay and composition; or bullying in schools.
The Scottish Government’s consultation and EQIA have noted that the introduction of a short-term lets licensing scheme and planning control areas do not give rise to any equality issues. Our consultations with hosts and residents have also not identified any equality issues. Direct and Indirect impacts on children, Socioeconomic disadvantage and people with shared interest have been documented further down in this assessment.
<b>2.3 Are there known impacts on children and young people within the subject matter of the policy?</b> For example, changes to education services, employment support for parents, playparks.
The policy could affect children and young people in these ways: a) as hosts themselves; b) as children of hosts; c) as guests or children of guests; d) as neighbours of short-term lets; or e) in local communities.  There are no direct impacts as the policy is not targeted at children or young people. In terms of indirect impacts, we acknowledge the Scottish Government findings that these are negligible with respect to children and young people as hosts. The indirect impacts for children of hosts and children and young people of guests, and as guests, are mixed: there may be a marginal additional cost, reducing household income; however, they may benefit from the mandatory safety conditions in their own home or the home they are staying in. The indirect impacts for children as neighbours and in the local community are positive as the licensing scheme will provide a mechanism to effectively tackle any issues in relation to noise, nuisance and antisocial behaviour issues.  We have not identified any particular groups that would be affected, and we do not know of any reason why the licensing of short-term lets would affect particular groups of children and young people more than others.

**2.4 How have people who might be affected been consulted and involved in the development of the policy ? Please provide dates and information**

The Scottish Government (SG) have carried out national consultation / engagement and research on the Short Term Let Licensing Policy and Control Area Regulations and have devised an EQIA based on stakeholder input and data. Their findings were as follows:

- a) Over 1,000 responses to the SG 2019 consultation on a regulatory framework for short-term lets and events in support of the consultation.
- b) Over 1,000 responses to the SG 2020 consultation on proposals for a licensing scheme and control areas, and virtual events and workshops in support of the consultation.
- c) Ongoing engagement and input from colleagues within Scottish Government, through the Short Term Lets Delivery Group.
- d) Independent research on the impact of short-term lets on communities, commissioned in 2019 to fill gaps in our evidence base.

In East Renfrewshire, we have utilised the above consultation feedback and consulted both internal and external stakeholders on how this statutory policy can be developed to suit the needs of East Renfrewshire hosts; residents; visitors and tourism, in particular:

- a) In June 2021 we consulted the proposals and sought feedback with 23 internal and partner stakeholders (across a range of services) through online meetings, including: Planning, Environmental Health, LHS and LDP teams; Community Safety, Legal & Licensing Services, Information & Cyber Security; Police Scotland; Fire and Rescue Scotland.
- b) Between August-September 2021 we consulted with the public through Citizens Space to gain a better understanding of the numbers likely to apply for a license, feedback on draft guidance, benefits and concerns around the mandatory licensing scheme and interest in participating in further consultation.
- c) Both of the above were repeated in 2022 – internal stakeholders/partners in March 2022 once final guidance had been issued by the Scottish Government and externally in July 2022 on our draft policy and additional conditions.
- d) We have actively participated in the Scottish Housing Network forums set up to share knowledge with other local authorities.
- e) We set up and chaired a benchmarking working group with other local authorities where the licensing scheme would be based within Housing Services or who had similar demographics.
- f) We are participated and offered feedback to Knowledge Hub on data collection requirements.
- g) We have published an STL landing page on our website which is being continually updated.

**2.5 Where children and young people will be affected, how have they been consulted and involved in the development of the policy? Please provide dates and information**

Please see above.

### 3. Impact on Equalities

In order to impact assess any new or existing policy it's important to consider the evidence about how it may affect people. Log information about the experiences and needs of people on the basis of different characteristics/circumstances, and whether the proposed policy could have a positive or adverse impact on that.

You may wish to refer to the following sources:

- Input from local Councillors
- Findings from engagement or involvement activities
- Information or feedback from groups of people, such as equality interest organisations and groups who speak on behalf of others
- National, regional or local statistics
- Analysis of enquiries or complaints from customers
- Recommendations from inspections or audits
- National or regional research to identify similar issues
- Comparisons with similar policies in other departments or authorities to identify similar issues

**Is it possible to collect new evidence that you don't have but think will be relevant?** For example: speaking to colleagues; adapting engagement approaches; setting up meetings or focus groups; and consulting interest organisations.

Characteristics/circumstances	Experience and needs (include sources)	Impact category (positive/neutral/negative) and assessment of impact
Socioeconomic disadvantage	<p>“Across Scotland as a whole, there were proportionally more Airbnb listings in less deprived areas, particularly those in the middle of the SIMD 2016 rankings. There were more Airbnb listings (11.9% of the Scottish total) in the least deprived decile than there were in the three most deprived deciles combined (10.3%).” Scottish Government 2020 consultation and Fairer Scotland Duty assessment.</p> <p>Three local areas in East Renfrewshire (within Lavern Valley) fall within the 20% most deprived areas of Scotland accounting for around 6,200 (7%) of East Renfrewshire’s population:</p> <ul style="list-style-type: none"> <li>• Dunterlie, East Arthurlie and Dovecothall (5</li> </ul>	<p>Negative impacts include the impact of short-term lets on the availability of housing stock, due to homes being removed from existing residential stock for use as short-term lets. This can also, in turn, increase house prices and rents in the private rented sector. This is unlikely to be a significant concern in East Renfrewshire with low anticipated numbers of STL applications, but will be kept under review.</p> <p>Positive impacts include offering guests on low incomes a cheaper alternative to other forms of accommodation (such as hotels) and the home sharing and home swapping models of short-term</p>

	<p>datazones)</p> <ul style="list-style-type: none"> <li>• Auchenback (2 datazones)</li> <li>• Neilston (1 datazone)</li> </ul> <p>This has been reflected in our monitoring of estimated STL numbers in East Renfrewshire with 70% of home or secondary letting occurring in the Eastwood side of the authority and 30% of room sharing in the Lavern Valley side of the authority.</p> <p>The recent EFRIA for the No One is Left Behind (NOLB) programme noted that: around 3,600 children are living in poverty within East Renfrewshire. This amounts to approximately 16% of all children which is below the Scottish average, but broadly comparable with other councils in the same family group for children, housing and social work within the Local Government Benchmarking Framework.</p> <p>As of 2021 (NOLB data toolkit), the economic inactivity rate for East Renfrewshire is 27.5%. The number of workless household within East Renfrewshire as of 2021 was 18.4% which is on par with the national average and there will be geographical trends within this (in particular higher rates in Dunterlie/Auchenback).</p>	<p>letting also allow hosts to make extra money by renting out a spare room (or rooms) in their primary residence. Scottish Government consultation, noted that this could be important in helping them to maintain their mortgage payments, particularly if they were going through financial hardship.</p> <p>To reduce inequalities of outcome we have reviewed how we set our fees, in terms of the impact, on disadvantaged households as hosts.</p> <p>In doing so and recognising that the Scottish Government will not be specifying the levels that should be charged, and the need to cover costs to deliver the service, we have taken an approach to develop our fee structures and discounts based on both size and type of short term activity. The benefit of this is that, the fees could, broadly speaking, be proportionate to income from the activity.</p> <p>STL numbers and activity will be monitored on a quarterly and annual basis, therefore should any trends begin to appear which suggest discriminatory treatment was arising as a result of any components of the scheme or policy – amendments will be made either by the Scottish Parliament (licensing scheme) or by the local authority (policy) as soon as possible.</p> <p>The policy will not discriminate, directly or indirectly, against people at a socioeconomic disadvantage.</p>
Age	East Renfrewshire has both an ageing population and a high % of under 18s that both present service demands in health and social care as well as education provision.	It is anticipated (by current nature of existing short term let activity) that most contact will be made online or by email.

	<p>Population profile  Under 18 – 23%  18-49 years - 36%  50-69 years – 27%  70-84 years – 12%  85 years – 3%  Source - NRS mid-year population estimates 2019</p> <p>Some members within the community will not have the knowledge; access or confidence to work online or not will feel uncomfortable proving bank details online.</p>	<p>Any negative impact will be offset with offering a paper or alternative format application and payment within council collection halls and staff / friends or family support to complete where necessary.</p> <p>The initiative, proposal or policy will not discriminate, directly or indirectly, against age groups of any range.</p>
<p>Disability or long term health condition</p>	<p>Data from Scottish Health Survey in 2017 reports 32% of adults in Scotland have a disability and 10% of children have a disability.</p> <p>The Glasgow Disability Alliance published research in April 2020 highlighting that disabled people are harder hit by the pandemic not only because they may be at greater risk of severe illness – but equally or more so - because existing inequalities and persistent barriers like isolation and digital exclusion increase their vulnerability. It should be acknowledged that there is potential for less favourable treatment, indirect discrimination, unlawful harassment / victimisation and discrimination arising from disability. However there is no evidence to suggest that any of these would happen as a direct result of this policy.</p> <p>Some members within the community will not have the knowledge; access or confidence to work online or not will feel uncomfortable proving bank details online.</p>	<p>It is anticipated (by current nature of existing short term let activity) that most contact will be made online or by email.</p> <p>Any negative impact will be offset with offering a paper or alternative format application and payment within council collection halls and staff / friends or family support to complete where necessary.</p> <p>The initiative, proposal or policy will not discriminate, directly or indirectly, against anyone with a disability.</p>



<p>Ethnicity</p>	<p>The 2011 Census also showed that ER was the 5th most ethnically diverse population in Scotland with around 6% of the population from minority backgrounds. Over 5% of the ER population is Pakistani, Indian, Chinese or mixed/multiple ethnic origins.</p> <p>In addition to the main Christian groups there are significant Muslim (3%), Jewish (3%), Sikh (1%) and Hindu (0.4%) communities. The five most common languages, other than English, spoken at home by East Renfrewshire residents (0.2% or more) include Urdu, Punjabi, Chinese, Italian and Polish. Other languages spoken by over 0.1% of residents include French, Arabic, Hindi, Spanish and British Sign Language. Source: Scotland Census 2011, NRS.</p> <p>Some members within the community will not have the knowledge; access or confidence to work online or not will feel uncomfortable proving bank details online.</p>	<p>It is anticipated (by current nature of existing short term let activity) that most contact will be made online or by email.</p> <p>Any negative impact will be offset with offering a paper or alternative format application and payment within council collection halls and staff / friends or family support to complete where necessary.</p> <p>The initiative, proposal or policy will not discriminate, directly or indirectly, against anyone based on ethnicity.</p>
<p>Gender (including gender reassignment)</p>	<p>Male Population – 47.8% Female Population – 52.2%</p> <p>Women are more likely to be primarily responsible for childcare which can affect their income, employment and career progression. More women than men are lone parents, and lone parents can have lower incomes.</p> <p>Male unemployment is significantly higher than female unemployment.</p> <p>According to Stonewall Trans Report, LGBT in Britain, trans people are more likely to report experiencing harassment in public places. They tend to experience higher rates of mental health issues than the general population, and</p>	<p>The initiative, proposal or policy will not discriminate, directly or indirectly, against anyone based on gender including gender reassignment.</p>

	educational and working environments can be challenging.	
Marriage/Civil Partnership (only applicable to Council employment policy)	Over half (55%) of residents are married or in a civil partnership. More than ¼ of residents in East Renfrewshire (28%) are single i.e. have As above never married or been in a civil partnership. There is no accurate way of assessing discrimination on the status of marital or civil partnership status	The initiative, proposal or policy will not discriminate, directly or indirectly, against married people or civil partners.
Pregnancy / Maternity	Pregnancy can affect need to and regularity of accessing health and community services. Young mothers tend to be less qualified than older mothers when their first child is born. Although young mothers do resume their education at a later stage, they remain less qualified compared to older mothers who have continued to upgrade their qualifications at a higher rate. (Scottish Govt. Tackling Child Poverty Delivery Plan) Latest data shows that 7% of births in East Renfrewshire were to mothers aged under 25, less than the Scottish average of 17%.	The initiative, proposal or policy will not discriminate, directly or indirectly, against anyone who is pregnant.
Religion / Belief	East Renfrewshire is comparatively diverse in terms of religion/belief. It has more than twice the national average of Muslim residents and 2.6% of residents are Jewish, which represents 41% of the total Jewish population in Scotland. However there is comparatively less evidence on the impacts of religion and belief on people's experiences of accessing opportunities.	The initiative, proposal or policy will not discriminate, directly or indirectly, against anyone based on religion or belief.
Sexual orientation	There is limited evidence regarding the employment rates of people correlated with their sexual orientation in East Renfrewshire and in Scotland as a whole. However national data and evidence would suggest that LGBTI+ people can be impacted more by unemployment and workplace discrimination and harassment.	The initiative, proposal or policy will not discriminate, directly or indirectly, against anyone based on sexual orientation.

Providing unpaid care	More than 10% of the East Renfrewshire population provide unpaid care. (2011 Census)	The initiative, proposal or policy will not discriminate, directly or indirectly, against anyone who is an unpaid carer.
Any other relevant groups e.g. unemployed people, people experiencing homelessness, care leavers, people involved in the criminal justice system, people with literacy/numeracy barriers, people living in rural communities.	Continued support as outlined above will be provided to care experienced population, people engaging with criminal justice, unemployed, those experiencing homelessness, people with literacy/numeracy barriers, people living in rural communities. We have no local evidence to suggest that anyone in these groups would be particularly discriminated with this policy but have outline measures to negate any online, literacy, language or disability that would prevent applicants applying for a licence.	<p>It is anticipated (by current nature of existing short term let activity) that most contact will be made online or by email.</p> <p>Any negative impact will be offset with offering a paper or alternative format application and payment within council collection halls and staff / friends or family support to complete where necessary.</p> <p>The initiative, proposal or policy will not discriminate, directly or indirectly, against anyone based on their employment or housing status, care leavers, anyone involved in the criminal justice system, with literacy or numeracy barriers or living within rural communities.</p>

#### 4. Impact on socio-economic disadvantage

Socio-economic disadvantage means living on a low income compared to others in Scotland, with little or no accumulated wealth, leading to greater material deprivation, restricting the ability to access basic goods and services. Socio-economic disadvantage can be experienced in both places and communities of interest. East Renfrewshire communities where people are at greater risk of experiencing socioeconomic disadvantage and where resources must be targeted to meet needs are the localities of:

- Barrhead – Dunterlie, East Arthurlie and Dovecothall (ADD2)
- Auchenback
- Neilston
- Thornliebank

Consider the policy itself and the way it will be implemented. How may this result in different experiences for people in East Renfrewshire.

<p><b>4.1 In what way would the policy alleviate or entrench inequalities from socioeconomic disadvantage?</b></p> <p><i>Guidance note</i>  <i>Consider common inequalities such as poorer skills and attainment; lower paid and less secure work; greater chance of being a victim of crime; less chance of being treated with dignity and respect; lower healthy life expectancy; lower feeling of control over decisions that affect you.</i></p>
<p>The policy will look to potentially alleviate any disadvantages by providing improved safety and property condition standards for short term lets and the licensing scheme will also look make improvements for neighbours and communities by effectively tackling noise; nuisance; and anti-social behaviour issues.</p>
<p><b>4.2 What opportunities are there within this policy and the way it will be implemented to promote inclusion, participation, dignity and empowerment of people experiencing socioeconomic disadvantage?</b></p>
<p>Opportunities for inclusion and participation will include: accessible formats of the application process; information and advice being made available online and by staff administering the scheme; fee structure based on size and type of letting.</p>
<p><b>4.3 What will be done differently to focus on addressing the multiple inequalities experienced by some people in Auchenback, Barrhead, Neilston and Thornliebank?</b></p>
<p>With fewer anticipated short term let's operating in these areas (30) it is unlikely that this will be of significant concern but will be kept under review as we collate more data around the prevalence of short term let activity.</p>

## 5. Impact on Children's Rights

**This section must be completed if any potential impact on children and young people up to the age of 18 has been identified in sections 1-3.**

**If there are no impacts on children and young people GO TO SECTION 6**

A Children's Rights & Wellbeing Impact Assessment (CRWIA) is not required as the policy will not affect children and there is unlikely to be any direct or indirect impact on children.

Which General Principles of UNCRC are relevant to this policy/measure? Tick all that apply.	Which additional articles are relevant to this policy/measure? List all that apply	Which particular groups of children and young people are affected by this policy/measure? (e.g. young children, disabled children, children living in poverty, children in care, young people who offend).
<p><b>Article 2</b></p>	<p><input type="checkbox"/> n/a</p>	<p>We have not identified any particular groups that would be</p>

<p><b>Non-discrimination</b> Children should not be discriminated against in the enjoyment of their rights. No child should be discriminated against because of the situation or status of their parent/carer(s).</p>			<p>affected, and we do not know of any reason why the licensing of short-term lets would affect particular groups of children and young people more than others.</p>
<p><b>Article 3</b> <b>Best interests of the child</b> Every decision and action taken relating to a child must be in their best interests. Governments must take all appropriate legislative and administrative measures to ensure that children have the protection and care necessary for their wellbeing - and that the institutions, services and facilities responsible for their care and protection conform with established standards.</p>	<input type="checkbox"/>	n/a	<p>We have not identified any particular groups that would be affected, and we do not know of any reason why the licensing of short-term lets would affect particular groups of children and young people more than others.</p>
<p><b>Article 6</b> <b>Life, survival and development</b> Every child has a right to life and to develop to their full potential.</p>	<input type="checkbox"/>	n/a	<p>We have not identified any particular groups that would be affected, and we do not know of any reason why the licensing of short-term lets would affect particular groups of children and young people more than others.</p>
<p><b>Article 12</b> <b>Respect for the views of the child</b> Every child has a right to express their views and have them given due weight in accordance with their age and maturity. Children should be provided with the opportunity to be heard, either directly or through a representative or appropriate body.</p>	<input type="checkbox"/>	n/a	<p>We have not identified any particular groups that would be affected, and we do not know of any reason why the licensing of short-term lets would affect particular groups of children and young people more than others.</p>

In relation to the articles identified above, please explain how the impact will be positive, negative or neutral.

Relevant identified Article of UNCRC	Impact category (Positive/Negative/Neutral)	Assessment of impact (including consideration of whether the policy/measure might impact differently on different groups of children and young people affected).

## 6. Your results

Considering the evidence logged above, complete the following questions where possible.

<b>6.1 In what ways, if any, would this policy help to eliminate discrimination or undermine it?</b> Consider any potential adverse impact identified above.
We will support the application process by offering an online facility with payment function (most business activity is conducted online) and where this cannot be utilised we will have paper applications available with support to complete. We will publish information through our website; intranet; social media; economic development and non-domestic rates. We have access to interpretation services and differing formats of application forms.
<b>6.2 In what ways, if any, would this policy advance or undermine equality of opportunity?</b>
See above
<b>6.3 In what ways, if any, would this policy foster or undermine good relations between groups of people?</b> Consider aspects that may tackle prejudice or promote understanding between different groups.
Potential to undermine STL businesses
<b>6.4 In what ways, if any, will this policy advance or undermine the rights of children and young people?</b>
The policy and licensing scheme will not affect children and there is unlikely to be any direct or indirect impact on children.
<b>6.5 In what ways, if any, will this policy protect and promote the wellbeing of children and young people?</b>
N/a
<b>6.6 How will you communicate information about this policy to people who have: hearing and/or sight loss; English as a second language; are digitally excluded; have literacy/numeracy barriers?</b>
See 6.1 above.
<b>6.7 Is this policy to be carried out wholly or partly by contractors?</b> If yes, how will you incorporate equality expectations into the contract?

No.

## 7. Your Outcome

<b>7.1 Select the most appropriate</b>				
<input checked="" type="checkbox"/> No major change <input type="checkbox"/> Adjust the policy <input type="checkbox"/> Continue the policy <input type="checkbox"/> Stop the policy				
<b>7.2 Are there any significant and relevant information gaps that have not been filled during the development of this policy?</b>				
The missing details around prevalence and data collection will be monitored on a quarterly basis which will allow is review the policy within 12months of implementation.				
<b>7.3 What, in brief, does the evidence base underpinning the policy say about its potential impacts on inequalities of outcome?</b>				
Our assessment is the same as the Scottish Government findings - the introduction of our short-term lets licensing scheme does not give rise to any equality issues.				
<b>7.4 What, in brief, does the evidence base underpinning the policy say about its potential impacts on the rights of children and young people?</b>				
Our assessment is the same as the Scottish Government findings - the policy will not affect children and there is unlikely to be any direct or indirect impact on children.				
<b>7.5 Consider all evidence and findings of your assessment and complete this short action plan for addressing any potential adverse impact on people, including children and young people, in the policy itself, and in the way it is communicated/ implemented.</b>				
Identified adverse impact	Mitigating circumstances	Mitigating actions	Timeline	Responsible person

## 8. Approval

<b>Name of policy/proposal:</b>	Licensing of Short Term Lets
<b>Approval date:</b>	
<b>Approved by:</b>	
<b>Department:</b>	Environment (Housing Services)

## 9. No assessment required

Policy/Decision Title	
Department/ Service	
Responsible officer for taking decision	
Rationale for decision	Please record why an assessment is not required and what your justification is for making that decision. This must include confirmation that the policy/programme concerned does not constitute a strategic decision and/or has no relevance re protected characteristics, human rights or socio-economic inequalities
<b>Declaration:</b> I confirm that the decision <u>not</u> to carry out an Equality, Fairness and Rights Impact Assessment has been authorised by:  <b>Name and Job Title:</b>	



**Date Authorisation given:**