

Appendix 6 – Consultation Report



Brent Council Private Housing Services

Selective Licensing Proposal Consultation: Report of consultation findings

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Contents

Executive Summary	1
Introduction	1
Private Sector Landlord Licensing Consultation	1
Main Report	8
Section 1: Introduction	9
Introduction	9
The purpose of the consultation	9
Consultation Approach and Strategy	10
Evaluation of the Consultation	14
Consultation responses	15
Consultation Analysis and Reporting	15
Section 2: Questionnaire Survey Results	17
Introduction	17
Demographic profile of respondents to the consultation questionnaire	17
Key Findings	23
Response levels by respondent type, including neighbouring boroughs.....	24
Local Problems: Rating of problems in the local area by residents and landlords	25
Local Problems: Opinion on management of the private rented sector.....	26
Local Solutions: Opinion on how the private rented sector as a whole in Brent might be improved.....	27
Opinions on proposed selective licensing conditions	30
Tackling Problems: Support for extending the selective licensing	31
Section 3: Other comments received through the Licensing Questionnaire	34
Introduction	34
Table 3: Questionnaire Comments - Emerging themes and issues	34
3.1 Specific questions and General comments - Residents, Tenants and Businesses ..	35
3.2 Specific questions and General comments - Landlords and Managing agents.....	35
3.3 Specific questions and General comments - Other Stakeholders	36
Summary of other comments received through the questionnaire	36
Section 4: Findings from Forums and meetings	37
Introduction	37
Section 5: Written submissions	44
Introduction	44
Summary of email and letters	44
Summaries of written submissions	44
Summary of other comments	46
Appendices	48
Appendix A: Consultation Communications Activities Report	49
APPENDIX B: Questionnaire - Residents, Tenants and Businesses	56
Appendix B: Questionnaire – Landlords and Managing Agents	57
Appendix B: Questionnaire – Other Stakeholders	58
APPENDIX C: PRS Licensing 2016 Questionnaire Consultation Charts	59
APPENDIX C1: PRS Licensing 2016 Questionnaire Consultation Responses - Residents, Tenants and Businesses in Brent.....	59
Appendix D: Written submissions	77
Appendix E – Topline Charts	97

Selective Licensing Proposal Consultation: Report of findings

Executive Summary

Introduction

1. The Housing Act 2004 gives Councils the power to introduce selective licensing schemes for privately rented properties in order to improve standards of management in the private rented sector (PRS) and lead to an improvement of the area. The power to designate is subject to certain conditions and criteria, including the requirement to consult persons who are likely to be affected by the designation; and to consider any representations made in accordance with the consultation being met.
2. Additional criteria for making a scheme are now in force. <http://www.legislation.gov.uk/ukxi/2015/977/contents/made>. In addition to the already existing low demand and antisocial behaviour criteria, the Department for Communities and Local Government "Selective Licensing in the Private Rented Sector" Guide for Local Authorities states that a selective licensing designation may be made if the area to which it relates satisfies one or more of the following conditions, being an area experiencing:
 - i. Low housing demand or is likely to become such an area;
 - ii. Significant and persistent problem caused by anti-social behaviour (ASB);
 - iii. Poor property conditions;
 - iv. High levels of migration;
 - v. High level of deprivation;
 - vi. High levels of crime.
3. Brent Council is considering proposals to extend selective licensing to most or the entire borough. As per the requirements of the Housing Act 2004 and subsequent DCLG guidance (Revised April 2010 *Approval Steps for Additional and Selective Licensing Designation in England*), the Council has conducted a consultation process with landlords and managing agents, residents, tenants and businesses in Brent and with other stakeholders including neighbouring boroughs.

This report provides a summary of the consultation approach and findings, which will be considered alongside other evidence by the Council in deciding whether and how to extend selective licensing.

Private Sector Landlord Licensing Consultation

4. The aim of the consultation was to provide local residents, landlords/managing and letting agents with an opportunity to provide their views about the Draft Proposals to extend selective licensing scheme. Consequently, the consultation covered the following areas:
 - Opportunities to provide views about the problems in their local area and in relation to their homes in Brent
 - Opportunities to provide views as to how the PRS as a whole in Brent might be improved
 - Opportunities to provide views on the proposed licensing conditions
 - Support for extending selective licensing for single family dwellings in Brent
 - Where selective licensing should apply based on ASB and also one or several of the new criteria: - poor property conditions, high levels of migration, high level of deprivation or high levels of crime,
 - Opinion as to what selective licensing would achieve
-

Consultation Approach and Strategy

5. The approach was primarily governed by the provisions of the Housing Act 2004 and the DCLG guidance (Revised April 2010). Three questionnaires were designed to capture views on the proposals. There is one for residents, tenants and businesses, another for private landlords and managing agents and a third questionnaire for other stakeholders, the latter focusing on interest from London Boroughs of Barnet, Camden, Ealing, Harrow, Hammersmith and Fulham, Kensington and Chelsea, and Westminster, as these boroughs border Brent. The consultation questionnaire was conducted online, though paper forms will be made available on request and in certain circumstances such as outreach sessions. Paper forms could be completed by hand and returned to the Council in a pre-paid envelope. The outline consultation was set out in a communications plan.

The aim was to use our customer insight to target our communications and evaluate their impact. The strategy was to use a broadly based communications drive with a mix of all channels to deliver consistent integrated messages. We used wide reaching tactics aimed at targeting all residents and stakeholders with more specific channels being used to reach tenants and landlords. The approach was also informed by an equalities assessment (EA).

Communications Activities (See appendix A for the full report)

6. The consultation ran for 11 weeks from 30 September 2016 and closed on Friday 16 December 2016, although the web-link remained open 19 December 2016. The vast majority of the work was focused on an external audience, although internal channels were used to engage staff whose work is public facing to act as ambassadors for the consultation and encourage more responses. The channels are listed below and an analysis of each activity is provided in the main report.

External

- Media relations
- Brent website (banner on homepage)
- Poster sites (JCDecaux UK)
- Leaflet drop to all residents & in libraries and council buildings
- Digital adverts on Gum tree and EBay
- The Brent magazine
- Social media (face book & twitter)
- Emails to landlord database
- Emails to stakeholder groups, e.g. housing needs database
- Stalls in Civic Centre and local businesses
- Brent Landlord Forum
- Brent Registered Providers Forum
- Brent Connects
- Brent Citizens Panels
- Voluntary Sector
- Mail out to stakeholders
- Advertising van
- Presentations to stakeholders, e.g. Barnet Landlords Forum
- Report to Brent Members of Parliament
- Briefing to the Chartered Institute of Environmental Health Officers (CIEH) Housing Study & Licensing group
- UK Landlords Accreditation Scheme circulation

Internal

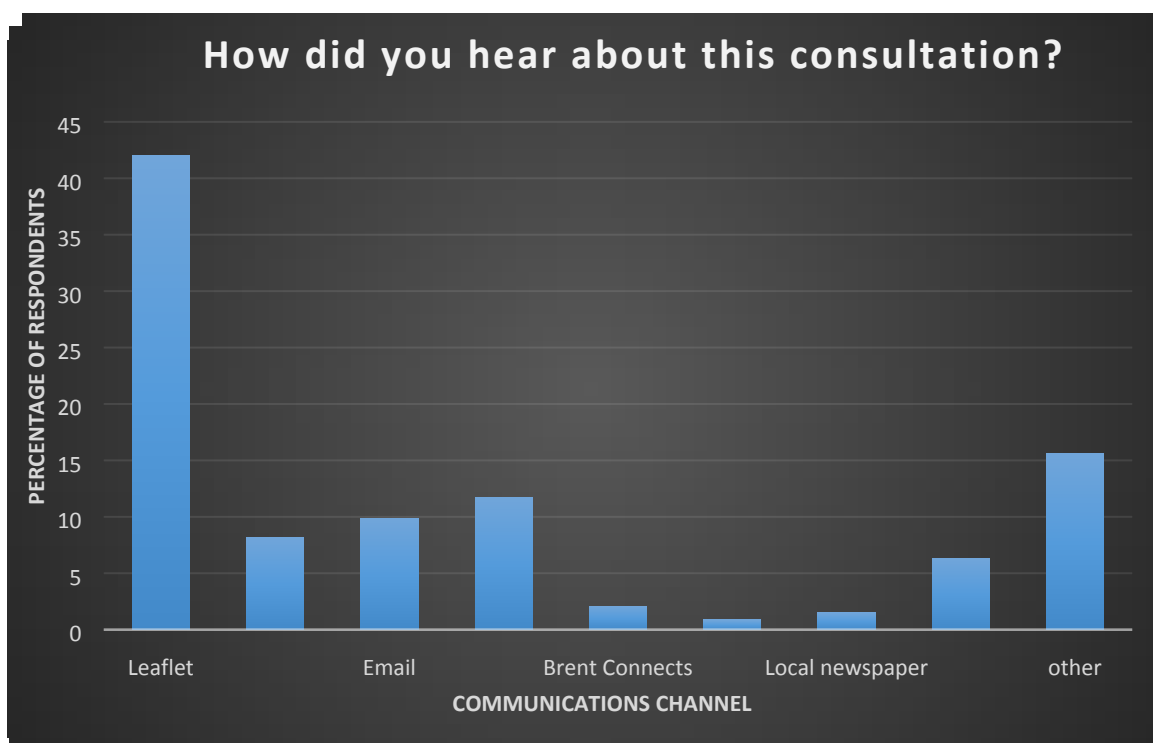
- Stall in Civic Centre
 - Yammer
-

- Word of mouth amongst colleagues, teams and the wider organisation.
- Email footers
- Brent Housing Partnership whose membership includes 14 Brent Registered Providers (Housing Association) Forum
- Briefing session for elected members

Evaluation using the question in the consultation

7. The leaflet has the most successful reach with nearly 42% of all respondents naming this as how they had heard about the consultation. The Brent website (11.7%), emails (9.8%) and posters (8.2%) were all roughly similar thereafter. 'The most popular 'other' response was through the in-store surveys and at the Civic Centre.

Figure 1: Evaluating the consultation



Consultation responses

8. The response to the consultation has been as follows:

- 1207 responses to the on-line and hard copy questionnaires, 20.7% over the target set in the communications plan (See **Appendix A**)
- **205** landlords/managing and managing agents and **855** residents (which includes 227) tenants living in private rented accommodation (26.55%) and **147** Other stakeholders (the full demographic profile of respondents to the survey is outlined below)
- Other comments via the questionnaire
- 11 individual letters/e-mails
- 4 written formal submissions from the National Landlords Association, the Residential Landlords Association, the National Approved Letting Scheme (NALs via the London Property Licensing), and from Home Safe Limited (see **Appendix D** for copies of the submissions).

Key consultation findings

9. The key findings are organised in to five themes:
- (a) Demographics and equalities profile of respondents
 - (b) Support for extending the licensing scheme and on what would be achieved
 - (c) Views about the problems in Brent including anti-social behaviour and property management
 - (d) Views on local solutions
 - (e) Perceptions about the proposed licensing conditions

Top line Demographic and Equalities Findings

10. Overall, the equalities characteristics are representative of the borough averages with the notable exception of responses the 18-24 age group.

Support for extending the licensing scheme and on what would be achieved

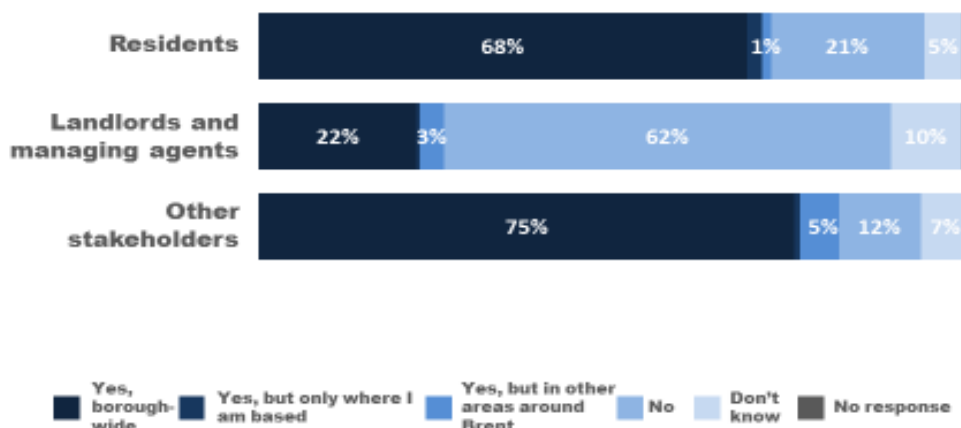
11. A clear majority of questionnaire respondents, mainly residents including tenants and other stakeholders agree with the council should extend selective licensing borough wide in Brent, while landlords are in almost equal opposition to extending licensing, where they agreed they unanimously supported a borough wide scheme:
- The figure 2 shows that a large majority all of residents (71%) and other stakeholders (76%) generally agree with the proposal to extend selective licensing in Brent, with 21% of residents and 12% of other stakeholders disagreeing.
 - In contrast, 62% of landlords disagreed and 25.49% agreed with the proposal to extend. There was a significant 12% don't know/no response from landlords. Of the 25.5% landlords who support extending licensing, 22% of them unanimously supported the borough wide proposal.

From the other consultation findings, some landlords and their representatives were opposed to licensing schemes in principle or would support a system of co-regulation, or with discounts to accredited landlords. Landlord representatives also suggested that the council should delay the introduction given the new powers being introduced by the government to deal with the private rented sector.

Specific concerns expressed by all groups related to licensing schemes bureaucracy, the council's motives and capacity to deliver the scheme and resources would need to identify unlicensed properties, deal with poor property conditions and to tackle criminal landlords.

Figure 2: Should the Council extend selective licensing in Brent?

In your opinion, should the council extend selective licensing for single family dwellings (for example self-contained flats or houses) in Brent?



Consultation dates: 30 September 2016 – 16 December 2016
Residents, tenants and businesses (833) Landlords and managing agents (205) Other stakeholders (147)

(Numbers in brackets are the number of respondents for each group)

Based on the consultation questionnaire survey landlords disagree but the majority of residents, tenants and businesses agree that introducing selective licensing would tackle problems by achieving all of the following:

- Shifting the reliance away from using resident complaints to identify problems
- Promoting a professional management ethos amongst private landlords
- Providing tenants with consistent information on acceptable standards of accommodation
- Allowing the council to take action against landlords who provide poor standards of accommodation
- Removing rogue landlords from the sector
- Reducing anti-social behaviour in the borough
- Providing safe homes for tenants to live in
- Providing a better approach to managing the private rented sector
- Allowing the council to take action against landlords whose tenants cause persistent anti-social behaviour

Views on local problems including anti-social behaviour and property management

- Notable proportions of both residents and landlords rated matters relating to enviro-crime, police reported crime, lack of community engagement, and migration as serious or very serious problems. Rubbish dumping and fly-tipping, untidy front gardens, poorly maintained properties, together with the high tenant turnover and high rents featured highest.
- It is noted that the definition of antisocial behaviour includes enviro-crime and police reported crime and hence the questionnaire responses overall rate ASB as a serious or very serious problem.
- There is strong agreement from residents that properties are poorly maintained and managed such as that there are contributing to the decline of areas in Brent and further that landlords have a responsibility to manage the properties effectively and to be “fit and proper” persons.

Local solutions

- Residents agreed (89%) and significant few landlords disagreed (16%) that the council should intervene and take control of the problems associated with high levels of ASB. The majority of residents and other stakeholders agreed but landlords equally disagreed that the council should have more control over the way that landlords manage their properties.
- Residents and other stakeholders agree (69.5%), but landlords disagree (74%) that the licensing scheme would help reduce anti-social behaviour

Views on the proposed selective licensing conditions

- Overall the licensing conditions proposed were at least tended to be agreed by an average of 63% of respondents, compared with average of 23% of the respondents tending to disagree.
- Landlord representatives in their submission indicated where conditions were unnecessary or otherwise and have asked that their points made are considered.

Other consultation findings

From section 3, the most other comments extracted from the open-ended and free text questionnaire fields were about the licence fees, followed by comments on licence conditions, the impact of licensing on landlord and on the impact on tenants. The majority of the comments, in percentage of responses received per group came from the landlords and managing agents.

To a relatively much lesser degree respondents commented upon the potential to improve PRS standards, noting that other measures to do so already exist. Comments were also made about dealing with anti-social behaviour, the evidence base for the proposals and regarding the council's challenge to deliver licensing, taking into account the amount bureaucracy thought to be involved.

The forums, meeting and written submissions as outlined in section 4 were useful and largely reflected, in particular, the opinion of landlords other and stakeholders. The consultation interfaces produced face to face discussion and delivered scheme options such as co-regulation, fee discounting, reducing bureaucracy, and calls to for the council to delay its plans in view of the new Government legislation being applied to private renting in 2017.

Conclusions

There is majority support amongst residents, tenants, businesses and other stakeholders to the proposal to extend licensing scheme to most of Brent. The views are that problems of ASB, poor property management, lack of community engagement and problems with private tenants exist in the local private rented sector and that the council should intervene to provide a solution. However, there is majority opposition amongst landlords to the proposal. This opposition centres on the following key points:

- Specific challenges to the evidence presented to support proposing to licence all or most of the borough
- In the timing of the proposal by Brent, in that plans could be delayed to see the impact of the new powers being introduced by the Government in 2017
- That is unreasonable to place the burden on good landlords as licensing will present unnecessary bureaucracy and economic burdens.
- Costs will be passed on to tenants and that some landlords will exit the local market

Where landlords agree (26%) and where there is support for the scheme from licensing representative organisations, the council is being asked to consider a system of co-regulation, greater support for landlords in dealing with ASB and problem tenants, applying licence fee discounts for certain landlords and to set reasonable licensing conditions.

**Selective Licensing Proposal Consultation:
Report of findings**

Main Report



Section 1: Introduction

Introduction

- 1.0 The Housing Act 2004 gives Councils the power to introduce selective licensing schemes for privately rented properties in order to improve standards of management in the private rented sector (PRS) and lead to an improvement of the area. The power to designate is subject to certain conditions and criteria, including the requirement to consult persons who are likely to be affected by the designation; and to consider any representations made in accordance with the consultation being met.
- 1.1 Additional criteria for making a scheme are now in force. <http://www.legislation.gov.uk/ukxi/2015/977/contents/made>. In addition to the already existing low demand and antisocial behaviour criteria, the Department for Communities and Local Government "Selective Licensing in the Private Rented Sector" Guide for Local Authorities states that a selective licensing designation may be made if the area to which it relates satisfies one or more of the following conditions, being an area experiencing:
- i. Low housing demand or is likely to become such an area;
 - ii. Significant and persistent problem caused by anti-social behaviour (ASB);
 - iii. Poor property conditions;
 - iv. High levels of migration;
 - v. High level of deprivation;
 - vi. High levels of crime.
- 1.2 Brent Council is considering proposals to extend selective licensing to most or all of the borough. As per the requirements of the Housing Act 2004 and subsequent DCLG guidance (Revised April 2010 *Approval Steps for Additional and Selective Licensing Designation in England*), the Council has conducted a consultation process with landlords and managing agents, residents, tenants and businesses in Brent and with other stakeholders including neighbouring boroughs.
- 1.3 This report provides a summary of the consultation approach and findings, which will be considered alongside other evidence by the Council in deciding whether to extend selective licensing and if so, the manner in which it should do so.

Private Sector Landlord Licensing Consultation

The purpose of the consultation

- 1.4 The aim of the consultation was to provide local residents, landlords/managing and letting agents with an opportunity to provide their views about the Draft Proposals to extend selective licensing scheme. Consequently, the consultation covered the following areas:
- Opportunities to provide views about the problems in their local (Brent) area and in relation to their homes in Brent
 - Opportunities to provide views as to how the PRS as a whole in Brent might be improved
 - Opportunities to provide views on the proposed licensing conditions
 - Support for extending selective licensing for single family dwellings in Brent
 - Where selective licensing should apply, based on ASB but also one or several of the new criteria: - poor property conditions, high levels of migration, high level of deprivation or high levels of crime, and
 - Their opinion as to what introducing selective licensing would achieve
-

Consultation Approach and Strategy

- 1.5 The approach was primarily governed by the provisions of the Housing Act 2004 and the DCLG guidance (Revised April 2010). Three questionnaires were designed to capture views on the proposals. There is one for tenants, other residents and businesses, another for private landlords with property in the Borough and a third questionnaire for stakeholders in the London Boroughs of Barnet, Camden, Ealing, Harrow, Hammersmith and Fulham, Kensington and Chelsea, and Westminster, as these boroughs border Brent. The consultation questionnaire was conducted online, though paper forms will be made available on request and in certain circumstances. Paper forms could be completed by hand and returned to the Council in a pre- paid envelope. The outline consultation was set out in a communications plan.

The aim was to use our customer insight to target our communications and evaluate their impact. The strategy was to use a broadly based communications drive with a mix of all channels to deliver consistent integrated messages. We used wide reaching tactics aimed at targeting all residents and stakeholders with more specific channels being used to reach tenants and landlords.

The approach was also informed by an equalities impact assessment.

Communications Activities (See appendix A for the full report)

- 1.6 The consultation ran for 11 weeks from 30 September 2016 and closed on Friday 16 December 2016, although the web-link remained open 19 December 2016. The vast majority of the work was focused on an external audience, although internal channels were used to engage staff whose work is public facing to act as ambassadors for the consultation and encourage more responses.

The channels are listed below, followed by an analysis of activity carried out in each one individually.

1. External

- Media relations
- Brent website (banner on homepage)
- Poster sites (JC Decaux)
- Leaflet drop to all residents & in libraries and council buildings
- Digital adverts on Gum tree and EBay
- The Brent magazine
- Social media (face book & twitter)
- Emails to landlord database
- Emails to stakeholder groups, e.g. housing needs database
- Stalls in Civic Centre and local businesses
- Landlord Forum
- Brent Connects
- Brent Citizens Panels
- Voluntary Sector
- Mail out to stakeholders
- Advertising van
- Presentations to stakeholders, e.g. Barnet Landlords Forum
- Report to Brent Members of Parliament
- Briefing to the Chartered Institute of Environmental Health Officers (CIEH) Housing Study & Licensing group
- UK Landlords Accreditation Scheme circulation

2. Internal

-
- Stall in Civic Centre

- Yammer
- Word of mouth amongst colleagues, teams and the wider organisation.
- Email footers
- Presentation to internal stakeholders, e.g. Brent Housing Partnership
- Briefing session for elected members

Media relations and Reach

Two press releases were issued during the course of the campaign, one at the start to announce it (03/10/16) and one half-way through (15/11/16) to encourage more responses. The releases were sent to local media (Brent & Kilburn Times, and GetWestLondon.co.uk), also to housing and environmental services trade press.

Coverage of the consultation featured in the [B&K Times on 04/10/16](#) and on [17/11/16](#) in both the paper editions and online and throughout the campaign in trade press including [Londonlandords.org.uk](#), [lettingagenttoday.co.uk](#) and [londonpropertylicensing.co.uk](#).

Media coverage providing context

Successful prosecutions of rogue landlord stories featured during the consultation period with three stories in the local and trade media. Although not specifically about the consultation they provide a context to the campaign and motivation to take part in the survey by highlighting the issue of the benefits of licensing as this was also part of the messaging of the news stories. The stories were Buxton Road (01/12/16), [Beverley Gardens](#) (07/12/16) and Mapesbury Road (04/12/16).

Brent Web site

During the period of the consultation we had a banner news item on our homepage and there were 450 unique page views to www.brent.gov.uk/landlordlicensing.

Online news stories

Both press releases were also used as news stories on the website during the period of the consultation. <https://www.brent.gov.uk/council-news/september-2016/improving-the-private-rented-sector-should-brent-extend-private-rented-property-licensing/> and <https://www.brent.gov.uk/council-news/press-releases/pr6439/3>.

Poster sites

Posters advertising the consultation were displayed on the large bus stop sites throughout the borough for a period of four weeks from 5 November to 2 December. There were a total of 76 sites including outside high footfall Brent landmarks such as tube stations, shopping areas, Wembley Stadium and the Civic Centre.

Leaflet mail out to residents

On 9 November we sent out a leaflet to all households in Brent, a total of 100,000 with copies also placed in council buildings such as libraries.

Digital advertising

From 7 November to 9 December Navigate Digital placed adverts on EBay and Gum tree websites to drive traffic to our website and encourage completion of the online survey.

The Brent Magazine

The Brent magazine reaches 320,000 readers monthly and is heavily promoted through our social media channels. In the [winter edition of the Brent magazine](#) we had a double page feature on the campaign, explaining the background and aims. One page of the double feature was the advert to take part in the consultation and signposting to the website, and how to get a paper copy of the survey.

Social Media - *Twitter and Face book*

During the campaign we sent out a total of 12 tweets, which received 5 engagements (likes or retweets). We used the hashtag #Brentlandlordlicensing. The Brent Twitter account has 14,700 followers. 5 adverts were posted on Face book during the course of campaign.

Communications to landlords and stakeholder groups

A total of three emails were sent to our landlord database which contains 3293 addresses, containing a link to the consultation and a summary of what it was about. The first was sent at the start of the campaign, the second on 02/12/16 with a reminder that there was only two weeks left to take part, and the final on 14/12/16 with a two days left reminder.

Two emails to the housing needs database, one at the start of the campaign and one on 14/12/16 with a two days left reminder.

An email to 80 stakeholders on 05/12/16, another one to 19 registered housing providers on 05/12/16. Letter and copies of the consultation were sent to 85 stakeholders by post. All stakeholders are connected to the organisation, and are established contacts to receive information from Brent.

Stands in Civic Centre and retail locations

Between 03 November and 13 December we held a total of seven public information stands in the Civic Centre, large retail locations and council buildings throughout the Borough. The dates and locations were as follows:

Date	Location
03/11/2016	Civic Centre
09/11/2016	Costco, Wembley Park
17/11/2016	Willesden Green Library
24/11/2016	Civic Centre
30/11/2016	Kingsbury Library/High Road
09/12/2016	B&Q, Cricklewood Broadway
13/12/2016	ASDA Wembley

Landlord Forum

On 1st November Brent hosted a meeting of the Landlords Forum which is a non-profit making organisation of private landlords and agents who rent property in West London. Around 200 people attended and a presentation was given about the consultation, directions to the website to complete the survey online, and paper copies of the consultation given out. An email was sent out the following week to all attendees and members of the group, who did not attend, with a reminder of the consultation and how to take part. The event was held at Brent's Civic Centre with Midas Property Club as our delivery partner and the bookings and registration hosted on the Eventbrite site.

Brent Housing Partnership and Brent Registered Providers Forums

A presentation on licensing titled "raising the standard in the private rented sector in Brent" was made to the Brent Housing Partnership, (BHP), an arms-length management organisations (ALMO) and community housing company owned by Brent Council at the Brent Registered Providers Forums on 28th September 2016 and later circulated to the forum members. The forum has a BHP reach of 12,500 and to all of the following housing associations: - Asra; A2dominion; Catalyst HG; Family mosaic; Genesis HA; HCHA; Hyde-housing; Metropolitan HT; Network HG; LQ group; NHHG; Octavia; Origin housing. A further meeting was attended on 7th December 2016.

Brent Connects

A total of three Brent Connect forum meetings were attended and a presentation given on the consultation. Brent Connect forums are regular meetings, covering five local areas and are an opportunity for residents to give their views on local issues and proposals and take part in consultations about the council's activity. They are used as part of the local democracy process to help decide priorities and policies for Brent. At these meetings paper copies of the survey were available, and attendees were signposted to the website to complete an online survey.

Voluntary Sector Forum

A presentation on the consultation was made to the Brent Voluntary Sector Forum on 7 December, attended by 30 individuals.

Advertising van

During the week commencing 7 November an advertising van drove around the borough with a large advert for the consultation.

Yammer

Yammer is an internal social network for Brent employees. Of Brent's 2,200 employees, 98% are signed up to the network. Two posts were made to the all company group, on 10/11/16 and 03/11/16.

Word of mouth

During the period of the consultation the private rented sector teams acted as ambassadors for the consultation, encouraging both employees and members of the public to take part. This was done either formally in team meetings or in general conversations with other teams throughout the council.

Evaluation of the Consultation

1.7 The table below shows the evaluation measures which were agreed.

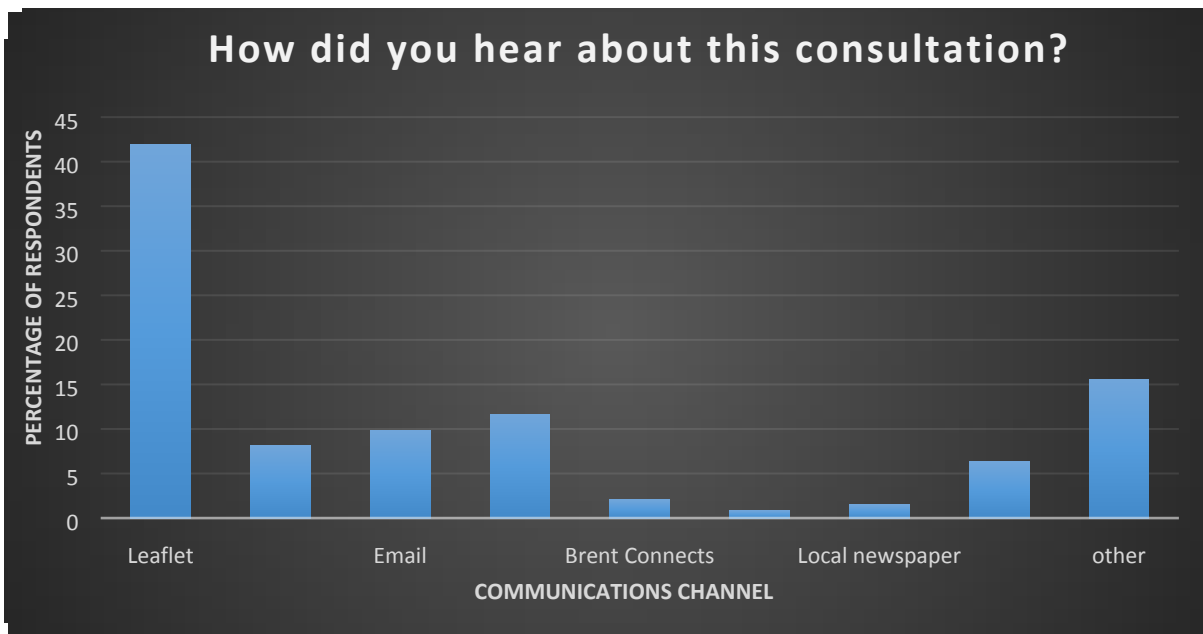
Evaluation measures agreed before campaign started		
1	Number of responses received	Target: 1,000
2	Number of news stories published in papers and online.	12
3	Emails and paper mail outs to landlords and stakeholders	7
4	Cost per action on digital adverts	£2.23
5	Click through rates on digital adverts	2, 630
6	Unique visitors to Brent Webpages with information on the consultation (homepage banner and news stories)	4592
7	Social media engagements face book & twitter	34
Additional evaluation measures		
8	Number of Yammer posts and engagements	2
9	Number of rogue landlord news stories during campaign	3
10	Question in survey "How did you hear about the consultation?"	See separate tables for landlords and residents & other stakeholders.
11	Number of people completing survey at stalls at Civic Centre & other locations.	310

12	Landlords forum – attendees (01/11/16)	Approx.250
13	Voluntary Sector Forum event attendees (07/12/16)	30

Evaluation using the question in the consultation

1.8 Included in the consultation questionnaire was a question “How did you hear about the consultation?” The responses are in Figure 1 below. The clear leader in terms of successful reach is the leaflet with nearly 42% of all respondents naming this as how they had heard about the consultation. The Brent website (11.7%) emails (9.8%) and posters (8.2%) were all roughly similar after that. ‘The most popular ‘other’ response was through the in-store surveys and at the Civic Centre, with more than 50 people giving this answer.

Figure 1: Evaluating the consultation



Consultation responses

1.9 The volume of response to the consultation has been as follows:

- 1237 responses to the on-line and hard copy questionnaires, 23.7% over target the communications plan (see **Appendix A** for questionnaire results)
- **205** landlords/managing and managing agents and **853** residents (which includes 221 tenants living in private rented accommodation (26%) and **147** “Other” stakeholders (the full demographic profile of respondents to the survey is outlined section 2)
- 11 individual letters/e-mails
- 4 written formal submissions from the National Landlords Association, the Residential Landlords Association, the National Approved Letting Scheme (NALs via the London Property Licensing), and from Home Safe Limited (see **Appendix D** for copies of the submissions).

Consultation Analysis and Reporting

1.10 The tables setting out responses to the consultation questionnaire are presented in **Appendix E**

and these results have been analysed to identify any important differences in opinion (**Appendix C**). The results are presented by the following four categories:

- Overall responses
- Landlord/managing and managing agent responses
- Residents, tenants and businesses in Brent
- Other stakeholders

In addition, all the open-ended comments received in the questionnaire, plus written submissions and discussions from the various forums have been reviewed and key themes presented in the report.

The rest of the report is structured as follows:

- Section 2 outlines the results and findings from the consultation questionnaire
 - Section 3 outlines the other findings from the consultation questionnaire
 - Section 4 findings from the other consultation activities and information such as the various meetings and forums
 - Section 5, written submissions received
 - Appendices, listed as A-E
-

Section 2: Questionnaire Survey Results

Introduction

2.1 A detailed breakdown of the questionnaire charts is provided in **Appendix C** to this report. Raw data tables are available elsewhere. This section presents summaries of the results from the questionnaire consultation survey, including:

- Demographic profile of respondents
- Response levels by respondent type, including neighbouring boroughs
- Rating of local problems in the local area
- Opinion on the management of the private rented sector as a whole in Brent
- Opinion on how the private rented sector as a whole in Brent might be improved
- Rating problems in relation to respondents homes or where they live in Brent
- Opinions on proposed selective licensing conditions
- Support for extending the selective licensing scheme
- Other comments received

The “About You” section of the questionnaire asked the respondent to state what capacity best describes them and therefore they were only able to choose one option. In the tables and charts the results are given as percentages so that the comparison could be made for different respondent groups.

Demographic profile of respondents to the consultation questionnaire

2.2 The consultation was promoted to different types of residents, landlords and other stakeholder groups. However this was an open consultation in which respondents self-selected to participate based on interest in the subject matter and there were no controls applied to make the survey demographically representative.

Table 1 presents the profile of respondents to the consultation questionnaire and compares this against the borough average where relevant. The first section of the table is dedicated to certain questions that are specific for the respondent type. It can be seen that the profile of respondents represents a broad mix across different community groups in relation to Brent:

Table 1 Demographic profile of respondents to the consultation questionnaire

	Landlords and managing agents	Residents	Other stakeholders	Borough average
<i>Responses</i>	205	853	147	<i>n/a</i>
Question 2: Type/number of properties owned/managed in Brent: Single occupancy house	Landlords and managing agents	Residents	Other stakeholders	Borough average
1 to 5	50%			
6 to 10	3%			
11 to 20	1%			
21 to 50	2%			
51 to 100	1%			

100+	1%			
No Response	40%			
Self-contained flat	Landlords and managing agents	Residents	Other stakeholders	Borough average
1 to 5	37%			
6 to 10	4%			
11 to 20	4%			
21 to 50	2%			
51 to 100	0%			
100+	3%			
No Response	50%			
Houses in Multiple Occupation – smaller than three storeys	Landlords and managing agents	Residents	Other stakeholders	Borough average
1 to 5	17%			
6 to 10	2%			
11 to 20	1%			
21 to 50	1%			
51 to 100	0%			
100+	1%			
No Response	78%			
Houses in Multiple Occupation – three storeys or more	Landlords & Man. Agents	Residents	Other stakeholders	Borough average
1 to 5	9%			
6 to 10	1%			
11 to 20	1%			
21 to 50	0%			
51 to 100	0%			
100+	0%			

No Response	87%			
Question 3: Are you a member of any of the following? Please tick all that apply.	Landlords and managing agents	Residents	Other stakeholders	Borough average
National Landlords Association (NLA)	19%			
Residential Landlords Association (RLA)	13%			
ARLA (Association of Residential Lettings Agents (ARLA))	8%			
Other landlord or lettings agent association	10%			
No Response	51%			
Question 4: Are you an accredited landlord or agent?	Landlords and managing agents	Residents	Other stakeholders	Borough average
Yes	20%			
No	78%			
No Response	2%			
Question12: How long have you owned a property or properties in Brent?	Landlords and managing agents	Residents	Other stakeholders	Borough average
Less than one year	2%			
One to two years	4%			
Two to five years	11%			
Five to ten years	22%			
More than ten years	47%			
Prefer not to say	11%			
No Response	2%			

Q10 - How long have you lived in Brent?	Landlords and managing agents	Residents	Other stakeholders	Borough average
Less than one year		3%		
One to two years		4%		
Two to five years		9%		
Five to ten years		12%		
More than ten years		66%		
Prefer not to say		4%		
No Response		2%		
Q11 - How long have you lived in your current property?	Landlords and managing agents	Residents	Other stakeholders	Borough average
Less than one year		5%		
One to two years		7%		
Two to five years		15%		
Five to ten years		13%		
More than ten years		53%		
Prefer not to say		5%		
No Response		3%		
Question1: Which of the following best describes you?	Landlords and managing agents	Residents	Other stakeholders	Borough average
Work for a neighbouring local authority			6%	
Resident in a neighbouring borough			69%	
Business owner in a neighbouring borough			1%	
Landlord in neighbouring borough			6%	
Managing or letting agent resident in			1%	

neighbouring borough				
Other interested party			14%	
Question 2: I am based in...	Landlords managing agents	Residents	Other stakeholders	Borough average
London Borough of Barnet			15%	
London Borough of Camden			10%	
London Borough of Ealing			8%	
London Borough of Harrow			34%	
London Borough of Hammersmith and Fulham			2%	
Royal Borough of Kensington and Chelsea			1%	
London Borough of Westminster			4%	
Other			26%	
No Response			0%	
Question 13: Gender - are you	Landlords M/agents	Residents	Other stakeholders	Borough average
Male	57%	47%	54%	51%
Female	29%	42%	41%	49%
Prefer not to say	11%	8%	3%	n/a
No Response	2%	3%	2%	n/a
Question 14: What is your age group?	Landlords M/agents	Residents	Other stakeholders	Borough average
Under 18	0%	0%	1%	23%
18 - 24	1%	2%	1%	9%
25 - 34	9%	14%	16%	20%
35 - 44	17%	19%	23%	15%
45 - 54	28%	21%	31%	12%
55 - 60	16%	10%	11%	6%
61+	17%	23%	12%	15%
Prefer not to say	10%	10%	5%	n/a

No Response	2%	2%	1%	n/a
Question 15: Do you have any long-standing illness, disability or infirmity? (Long-standing means anything that has troubled you over a period of time or that is likely to affect you over a period of time)	Landlords and managing agents	Residents	Other stakeholders	Borough average
Yes	9%	13%	7%	
No	82%	70%	88%	
Prefer not to say		14%		
No Response	9%	4%	5%	
Question 16: How would you describe your ethnic background?	Landlords & Man. agents	Residents	Other stakeholders	Borough average
White	32%	44%	31%	36%
Mixed/multiple ethnic groups	3%	4%	3%	5%
Asian/Asian British	29%	20%	28%	34%
Black/African/Caribbean/Black British	3%	7%	16%	19%
Other ethnic group	2%	3%	3%	6%
Prefer not to say	25%	22%	16%	n/a
No Response	4%	2%	3%	n/a
Question 17: What is your religion or belief?	Landlords and managing agents	Residents	Other stakeholders	Borough average
Buddhist	3%	1%	0%	1%
Christian	23%	31%	33%	41%
Hindu	20%	9%	14%	18%
Jewish	1%	2%	1%	1%
Muslim	6%	6%	13%	19%
Sikh	0%	1%	1%	1%

None	13%	17%	12%	11%
Prefer not to say	26%	27%	21%	7%
Other	2%	3%	3%	1%
No Response	4%	3%	1%	n/a
Question 18: What is your sexual orientation?	Landlords and managing agents	Residents	Other stakeholders	Borough average
Heterosexual/straight	62%	65%	73%	97%
LGBT*	2%	2%	4%	3%
Prefer not to say	29%	28%	20%	n/a
No Response	6%	4%	3%	n/a
Question 19: How did you hear about this consultation?	Landlords and managing agents	Residents	Other stakeholders	Borough average
Leaflet	23%	42%	4%	
Poster	7%	8%	8%	
Email	21%	10%	6%	
Brent website	16%	12%	9%	
Brent Connects	2%	2%	4%	
Brent Citizens' Panel	2%	1%	1%	
Local newspaper	0%	2%	2%	
Word of mouth	12%	6%	14%	
Other	13%	16%	50%	
No Response	3%	2%	2%	

*London average according to 2014 Integrated Household Survey the % of adults who are Gay, Lesbian or Bi-sexual was 2.6% in London

Houses in Multiple Occupation – three storeys or more	Landlords/ managing agents	Residents	Other stakeholders	Borough average
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1 to 5	9%			
6 to 10	1%			
11 to 20	1%			
21 to 50	0%			
51 to 100	0%			
100+	0%			
No Response	87%			
Question 3: Are you a member of any of the following? Please tick all that apply.	Landlords and managing agents	Residents	Other stakeholders	Borough average
National Landlords Association (NLA)	19%			
Residential Landlords Association (RLA)	13%			
ARLA (Association of Residential Lettings Agents (ARLA))	8%			
Other landlord or lettings agent association	10%			
No Response	51%			
Question 4: Are you an accredited landlord or agent?	Landlords/ managing agents	Residents	Other stakeholders	Borough average
Yes	20%			
No	78%			
No Response	2%			
Question12: How long have you owned a property or properties in Brent?	Landlords and managing agents	Residents	Other stakeholders	Borough average
Less than one year	2%			
One to two years	4%			
Two to five years	11%			
Five to ten years	22%			
More than ten years	47%			
Prefer not to say	11%			

No Response	2%			
Q10 - How long have you lived in Brent?	Landlords and managing agents	Residents	Other stakeholders	Borough average
Less than one year		3%		
One to two years		4%		
Two to five years		9%		
Five to ten years		12%		
More than ten years		66%		
Prefer not to say		4%		
No Response		2%		

Key Findings

2.3 Table 1 - Top line Demographic and Equalities Findings:

- 50% of landlords and managing agents responding own/manage fewer than 5 single occupancy houses in Brent with 37% owning or managing self-contained flats
- 50% of landlords responding are members of a landlords or letting agents association, while only 20% of the landlords or agents responding are accredited
- 17% of landlords have owned a property in Brent for less than 2 years. 69% have owned a property in Brent for more than 5 years (47% owning for more than 10 years)
- Overall, the equalities characteristics are representative of the borough averages with the notable exception of responses the 18-24 age group.

2.4 Response levels

- Each of residents, landlords and other stakeholders groups completed relatively large numbers of questionnaires with their interests being reasonably widely represented.

2.5 Local problems

- Notable proportions of both residents and of landlords rate enviro-crime, police reported crime, lack of community engagement, migration, problems with tenants as a problem. It is noted that the definition of antisocial behaviour includes enviro-crime and police reported crime.

2.6 Local solutions

- Although more residents are more likely to agree (89%) than landlords, significant few landlords disagreed that council should intervene and take control of the problems associated with high levels of ASB (16%)
 - 71% of residents and other stakeholders at least tended to agree that the council should have more control over the way that landlords manage their properties. Landlords responded in almost opposite proportions with 68% at least tending to disagree
 - Residents and other stakeholders agree (69.5%), but landlords disagree (74%) that the licensing scheme would help reduce anti-social behaviour
-

2.7 Selective Licensing conditions

- Overall the licensing conditions proposed were at least tended to be agreed by an average of 63% of respondents, compared with average of 23% of the respondents tending to disagree

2.8 Support for extending selective licensing

- Overall a clear majority of respondents, mainly residents including tenants and other stakeholders agree with the council should extend selective licensing borough wide. While landlords are in almost equal opposition to extending licensing generally, where they agree they unanimously support a borough wide scheme

Response levels by respondent type, including neighbouring boroughs

2.9 Table 2 shows that each of residents, landlords and other stakeholders groups completed relatively large numbers of questionnaires. There are sub-groups stated for each category (see appendix) so as to recognise their opinions. As tenants are an important sub-group we have filtered the level of response (20.23%) for the group, but their views are submitted as part of the residents' etc. questionnaire analysis. **Appendix C** provides a detailed breakdown for each respondent group.

In Figure 1(b) we have filtered the results further for tenants* and show 32% are tenants responses of which 26.55% are private sector tenants. Figure 1(b) shows a fair representation across Brent's tenant tenure, with 63% from private sector tenants in single family dwellings.

Table 2(a)

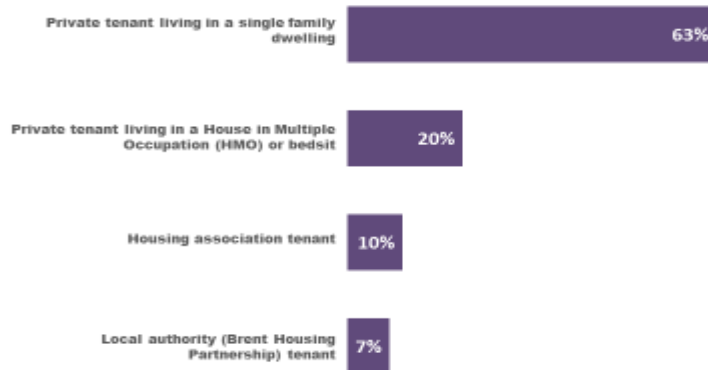
Respondent	Responses	Per cent
Residents, tenants* and businesses	853	70.7
Landlords and managing agents	205	17.0
Other stakeholders	147	14.3
Total	1205	100%

Figure 2: Response level for Tenants

2.10 The results in table 2 above were filtered for tenants.

- Private tenant living in a single family dwelling (for example, a self-contained flat or house)
 - Private tenant living in a House in Multiple Occupation (HMO) or bedsit where you share some basic amenities (for example, toilet, bathroom, kitchen) with others
 - Local authority (Brent Housing Partnership) tenant
 - Housing association tenant
-

Q1 - Which of the following best describes you?



Consultation dates: 30 September 2016 – 16 December 2016
853 residents, tenants and businesses in Brent

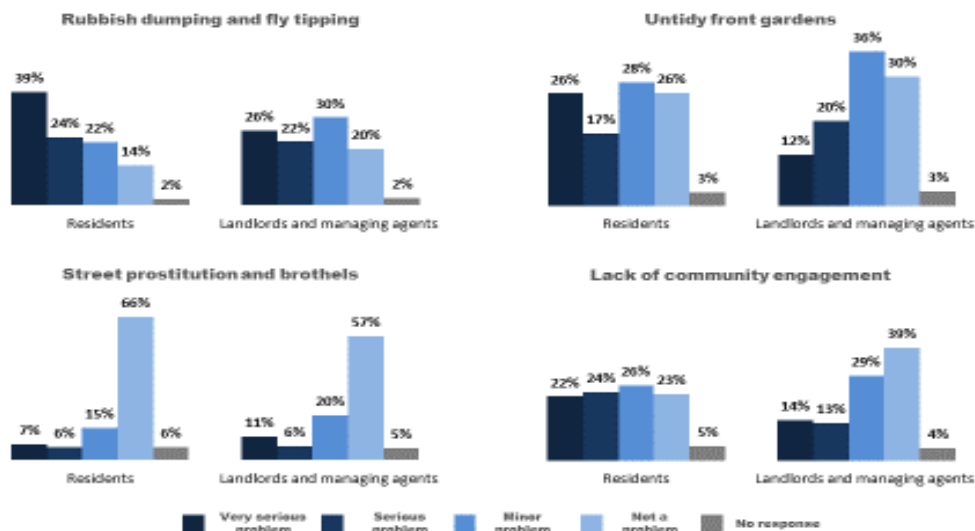
Local Problems: Rating of problems in the local area by residents and landlords

2.11 From figures 3a & 3b notable proportions of both residents and landlords rated enviro-crime; police reported crime, lack of community engagement, migration, problems with tenants as a problem. It is noted that the definition of antisocial behaviour includes enviro-crime and police reported crime.

- For Residents and landlords' groups respectively, typically, rubbish dumping and fly tipping (65% & 78%) and untidy front gardens (71% and 68%) to be a problem
 - A significant proportion of residents (28%) and of landlords (37%) indicated that street prostitution and brothels was a problem, though the majority stated that this was not a problem
 - A significant majority of residents (60%) and of landlords (62%) indicated that police reported crime e.g. burglary in Brent was a problem.
 - Levels of migration (63% residents/47%), tenants sub-letting (58% residents/54% landlords) as well as tenants not being aware of their legal responsibilities (62% of residents/46% of landlords) are seen as both groups as a problem.
 - The response to lack of community engagement is an interesting one. 72% of residents and 56% of landlords rate this as a problem. *It can be seen as being vital in assisting with a policy of involving local people to solve problems in their neighbourhoods and to taking a more local approach and responsibility.*
-

Figure 3a

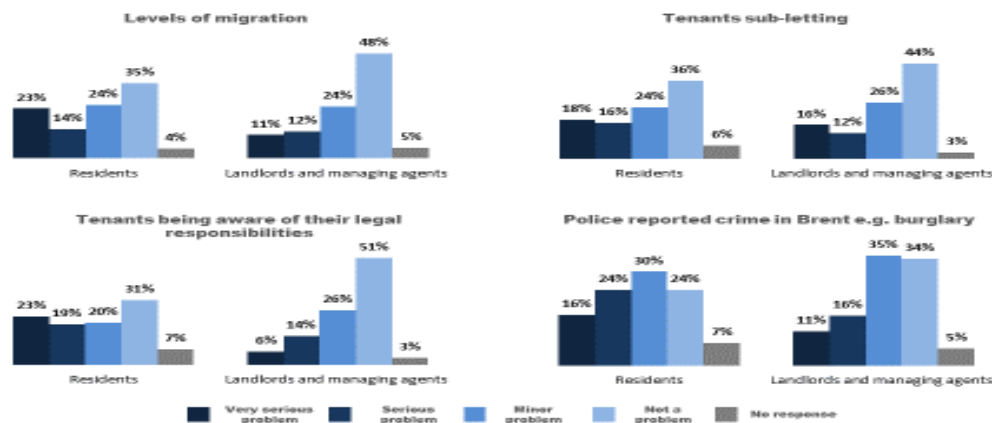
How would you rate the following problems in your local area? / As a resident, landlord or agent in Brent, how would you rate the problems identified below?



Consultation dates: 30 September 2016 – 16 December 2016
Residents, tenants and businesses (855) Landlords and managing agents (205) Other stakeholders (147)

Figure 3b

How would you rate the following problems in your local area? / As a landlord or agent in Brent, how would you rate the problems identified below?



Consultation dates: 30 September 2016 – 16 December 2016
Residents, tenants and businesses (855) Landlords and managing agents (205) Other stakeholders (147)

Local Problems: Opinion on management of the private rented sector

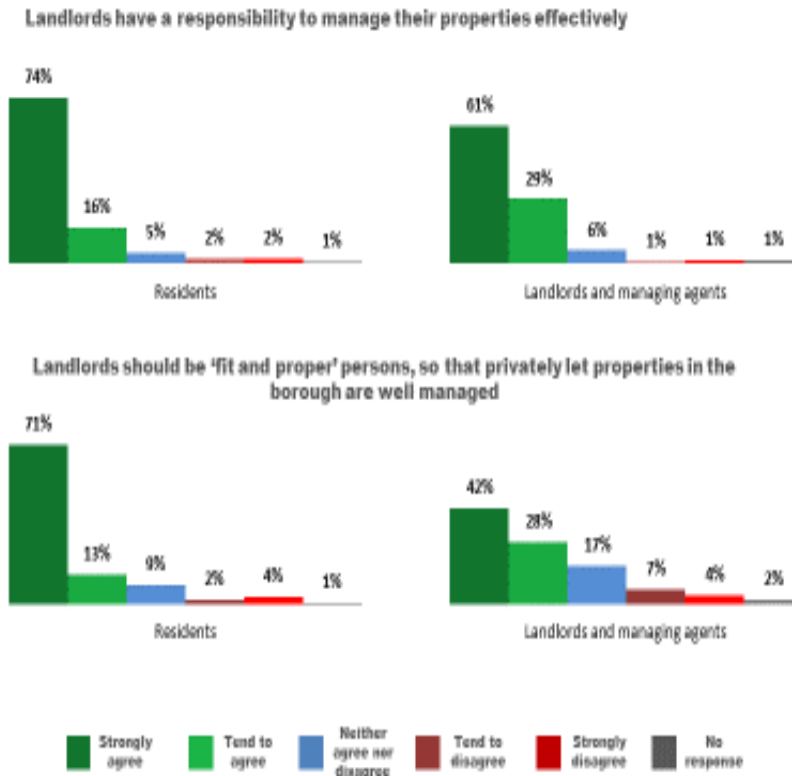
2.12 These questions sought opinions as to what the extent of poorly maintained and poorly managed privately let properties were contributing to the decline of some areas in Brent and to the extent to which landlords were responsible and should be “fit and proper” persons to effectively manage their properties. (Figure 4)

- Overall the overwhelming majority of both groups (90%) agreed/tend to agree that landlords have a responsibility to manage their properties effectively, with a significant proportion agreeing strongly.
- 84% of residents and 70% of landlords agreed that landlord should be “fit and proper” persons to manage their properties. Although residents were more likely to agree to this

statement, twice as many landlords (17%) than residents (9%) neither agreed nor disagreed with the statement.

Figure 4

Thinking about the private rented sector as a whole in Brent, to what extent do you agree or disagree with the following statements?



Consultation dates: 30 September 2016 – 16 December 2016
 Residents, tenants and businesses (893) Landlords and managing agents (205) Other stakeholders (147)

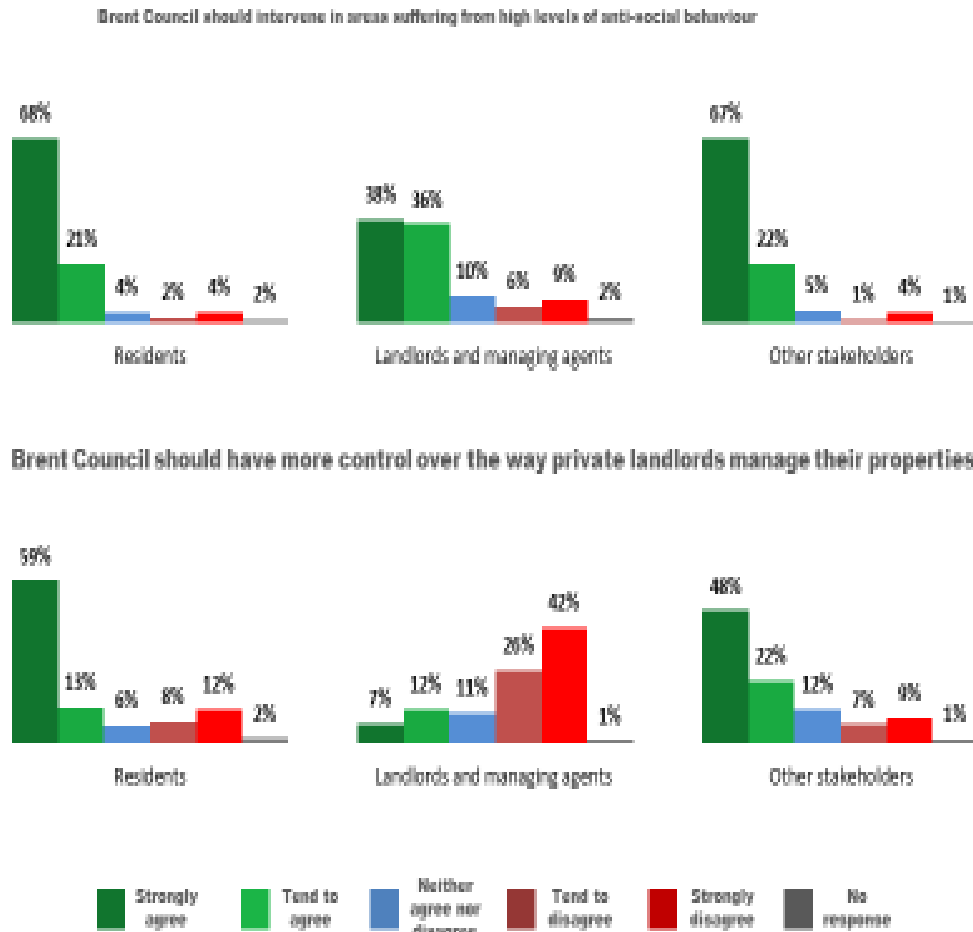
Local Solutions: Opinion on how the private rented sector as a whole in Brent might be improved

2.13 These questions were asked to all three stakeholder groups and sought opinions as to how the private rented sector in Brent might be improved what the extent the council should intervene and take control of the problems associated with high levels of ASB, management and poor property conditions (Figure 5). Although more residents are more likely to agree than landlords, only 16% of landlord disagreed with the statement:

- Equal amount of residents and other stakeholders (89%) significantly agreed that the council should intervene in areas suffering from high levels of ASB. A lesser amount of landlords (74%) but still the vast majority agreed with the statement, but over twice as many landlords (10%) neither agreed an disagreed compared to (4%) of residents. Figure 5a.
- Overall an average of 71% of residents and other stakeholders at least tended to agree that the council should have more control over the way that landlords manage their properties, with an average of 54% strongly agreeing and average 18% at least tending to disagree. Landlords responded in almost opposite proportions with 19% agreeing and 68% at least tending to disagree, with 42% strongly disagreeing with the statement. Figure 5a.

Figure 5 (a)

Thinking about how the private rented sector as a whole in Brent might be improved, to what extent do you agree or disagree with the following statements?



Consultation dates: 30 September 2016 – 16 December 2016
 Residents, tenants and businesses (895) Landlords and managing agents (305) Other stakeholders (147)

Residents agree, but landlords disagree that the licensing scheme would help reduce anti-social behaviour

2.14 Potential for licensing of the PRS to reduce Anti-social Behaviour: Figure 5b

- An average of 69.5% of residents and other stakeholders at least tend to agree that the licensing scheme will help reduce anti-social behaviour, while 74% of landlords at least tending to disagree (of which 54% strongly disagreed).
- Residents were more likely than landlords to agree with this statement. For example, 67% of residents at least tended to agree compared to just 14% of landlords
- The majority of other stakeholders at least agree (72%), with 15% at least disagreeing.

Figure 5(b): Potential for licensing scheme to help reduce anti-social behaviour

Thinking about how the private rented sector as a whole in Brent might be improved, to what extent do you agree or disagree with the following statements?



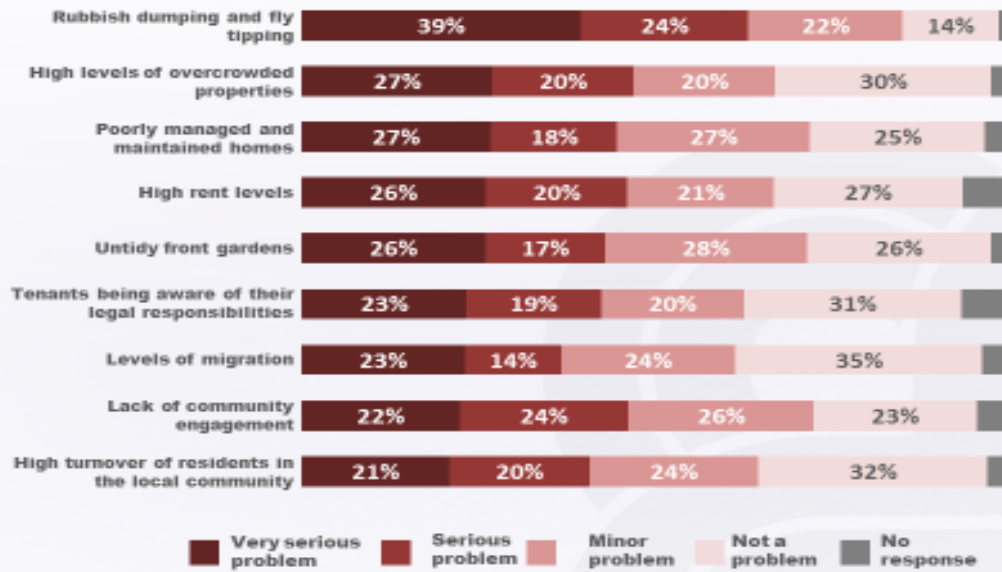
Consultation dates: 30 September 2016 – 16 December 2016
 Residents, tenants and businesses (855) Landlords and managing agents (205) Other stakeholders (147)

Rating problems in relation to own home or where they live in Brent

2.15 Residents, tenants and Businesses Figures 6 and 6a:

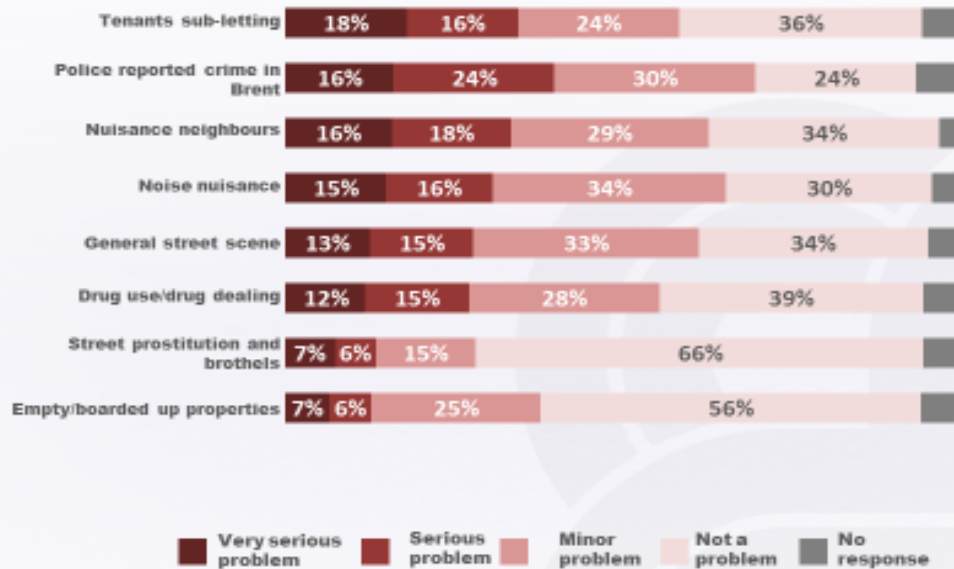
A significant proportion of residents rated the problems associated to private renting as at least a problem. Rubbish dumping and fly-tipping was a problem. Landlord identified that the matters were a problem but rated them generally less seriously than residents. Landlords rated problems of poorly managed and poor property conditions highest.

Q2 - How would you rate the following problems in your local area?



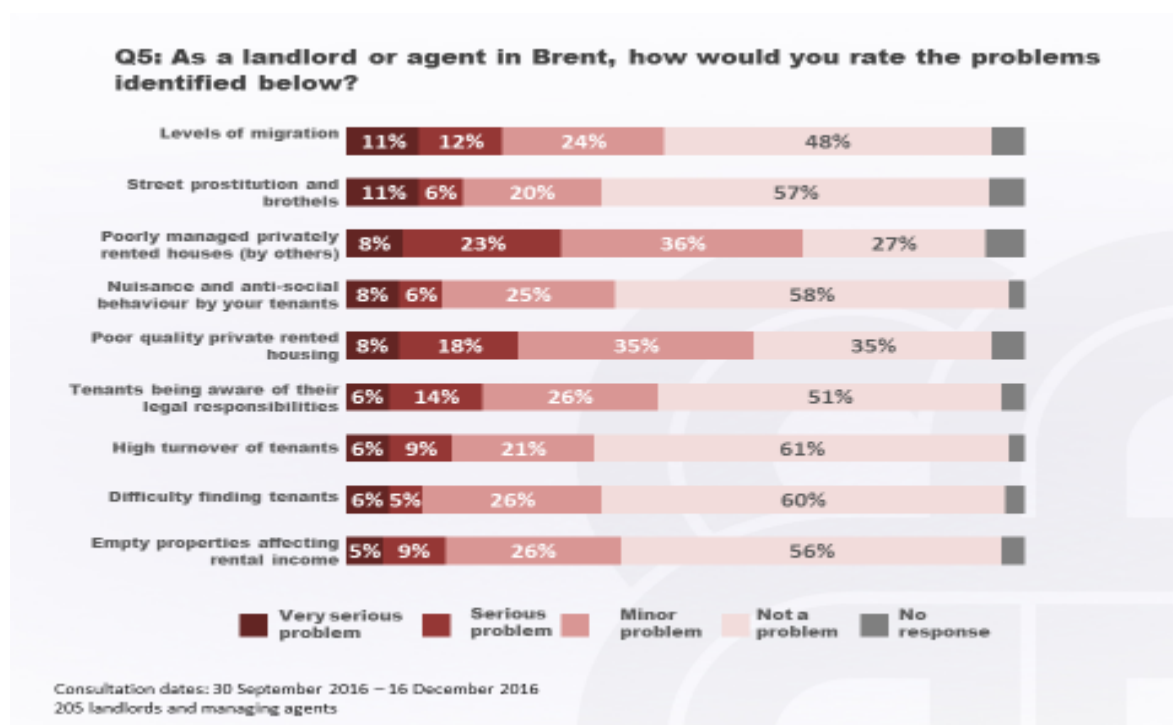
Consultation dates: 30 September 2016 – 16 December 2016
853 residents, tenants and businesses in Brent

Q2 - How would you rate the following problems in your local area?



Consultation dates: 30 September 2016 – 16 December 2016
853 residents, tenants and businesses in Brent

Rating of problems cont'd – Landlords Figure 6a



Opinions on proposed selective licensing conditions

2.16 The questionnaire sought views on the proposed licensing conditions, displaying the mandatory conditions for all licences and stating that the full condition can be found at www.brent.gov.uk/landlordlicensing. The full list was also as an appendix in the proposal document. The respondents were asked “to what extent do you agree or disagree that the proposed selective licensing conditions above are reasonable?” Their responses are given in Figure 7.

If disagreeing, the respondents were then able to give their reasons in an open text box. The reasons are captured in Section 3 – Other comments received through the consultation questionnaire.

- Overall the licensing conditions proposed were at least tended to be agreed by an average of 63% of respondents, compared with average of 23% of the respondents tending to disagree.
- An overwhelming majority of residents and other stakeholders agreed or strongly agreed at 66% and 87% respectively.
- Landlords were least in agreement with 36% either tending to agree (21%) or strongly agreeing (15%).
- Landlords were most likely to disagree (47%) than the residents (15%). The main reasons landlords stated for disagreement were...

Figure 7: Agreement with proposed Selective Licensing Conditions

To what extent do you agree or disagree that the proposed selective licensing conditions above are reasonable?



Consultation dates: 30 September 2016 – 16 December 2016
 Residents, tenants and businesses (855) Landlords and managing agents (205) Other stakeholders (147)

Tackling Problems: Support for extending the selective licensing

2.17 In tackling the problems, respondents were asked whether they agree or disagree with the council’s proposal to extend selective licensing in Brent – “yes or No”, and if agreeing were to give their opinion as to whether the scheme should apply borough wide or in other areas. Figure 8

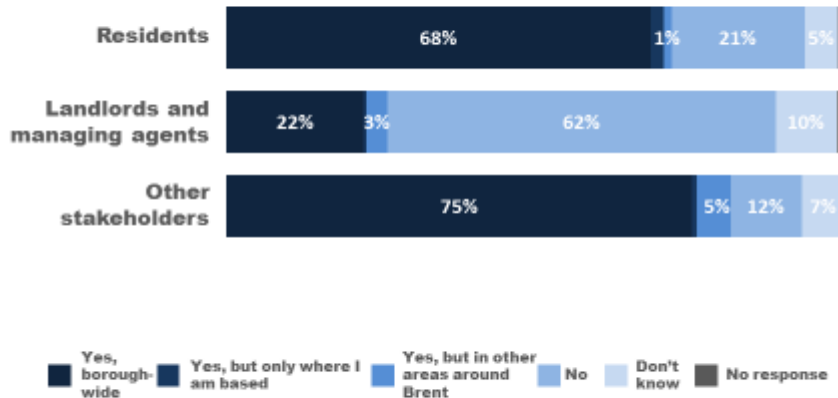
If agreeing that licensing should be based in certain areas, the respondents were then able to specify location in an open text box. The reasons are captured in Section 3 – Other comments received through the consultation questionnaire.

2.18 Overall a clear majority of respondents, mainly residents including tenants and other stakeholders agree with the council should extend selective licensing borough wide in Brent, while landlords are in almost equal opposition to extending licensing generally, where they agree they unanimously support a borough wide scheme:

- Overall, 68% of residents and 70% of other stakeholders extending selective licensing borough wide in Brent. Of the 25.5% landlords who support extending licensing, they unanimously (22%) support the borough wide proposal
- Residents and other stakeholders were more likely than landlords to agree with the proposal. Figure 7 shows that a large majority all of residents (71%) and other stakeholders (76%) generally agree with the proposal to extend selective licensing in Brent, with 21% of residents and 12% of other stakeholders disagreeing.
- In almost mirroring contrast, 62% of landlords disagreed and 25.49% agreed with the proposal to extend. There was a significant 12% don’t know/no response from landlords.
- Where responses supported licensing but not borough wide, the total “please state” count was 6 and therefore there was insufficient further information regarding the any specific main locations and areas.

Figure 8: Should the Council extend selective licensing in Brent?

In your opinion, should the council extend selective licensing for single family dwellings (for example self-contained flats or houses) in Brent?



Consultation dates: 30 September 2016 – 16 December 2016
 Residents, tenants and businesses (855) Landlords and managing agents (205) Other stakeholders (147)

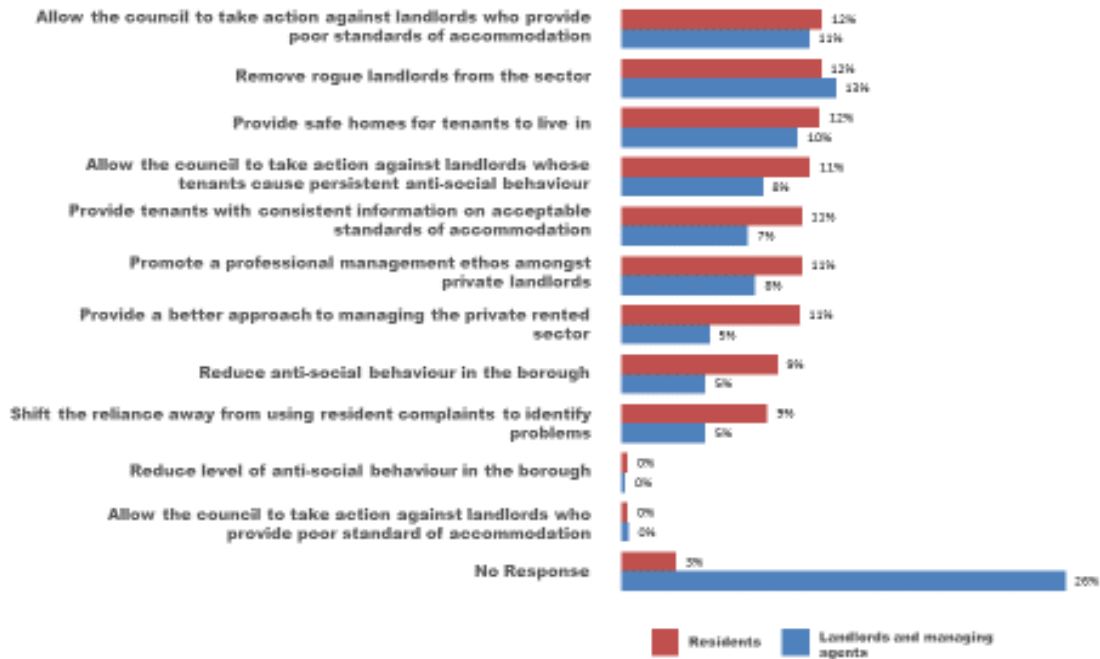
Tackling Problems: Would introducing selective licensing achieve any of the following?

2.19 Residents and landlords were asked their opinion on a number of statements in relation to what selective licensing would achieve. Respondents could select multiple responses. Based on the consultation questionnaire survey only a minority of landlords supported, but majority of residents, tenants and businesses of landlords supported the following statements. The statements gaining the most support from landlords were to that licensing would “remove rogue landlords from the sector”, 27%, and “Allowing the council to take action against landlords who provide poor standards of accommodation”, 24.9%.

- Shifting the reliance away from using resident complaints to identify problems
- Promoting a professional management ethos amongst private landlords
- Providing tenants with consistent information on acceptable standards of accommodation
- Allowing the council to take action against landlords who provide poor standards of accommodation
- Removing rogue landlords from the sector
- Reducing anti-social behaviour in the borough
- Providing safe homes for tenants to live in
- Providing a better approach to managing the private rented sector
- Allowing the council to take action against landlords whose tenants cause persistent anti-social behaviour

Figure 9:

In your opinion, would introducing Selective Licensing achieve any of the following? (tick all that apply)



Consultation dates: 30 September 2016 – 16 December 2016
 Residents, tenants and businesses (833) Landlords and managing agents (205) Other stakeholders (147)

Section 3: Other comments received through the Licensing Questionnaire

Introduction

The questionnaire allowed respondents to be more specific or to give reasons in relation to these questions:

- (1) Other matters which were problems in the local area (Residents and landlords)
- (2) Why they might have disagreed with the proposed licensing conditions (All)
- (3) If they wish to see selective licensing in place, but borough wide to specify where (All)
- (4) Further comments regarding the proposal (Other Stakeholders only)

Additionally respondents provided general comments in submitting their questionnaire. These qualitative *free text* comments have been categorised in relation to themes and quantified in Table 3 for each group (figures in brackets are the number of respondents though not all provided additional comments¹) and also to show the number of times the issue was mentioned, where mentioned several times. Paragraphs 3.1 to 3.3 provided details of the comments made.

¹ Only where an issue has been mentioned several times has it been included in the list above.

Table 3 below indicated that there were many free text responses and comments made, notably from landlords when expressed as a percentage of the groups responses. Most comments were in relation to licence conditions, followed by comments on licence fees, the impact of licensing on landlord and on the impact on tenants. To a much lesser degree respondents commented on the potential to improve PRS standards, noting that other measures to do so already exist. Comments were also made on the challenge to deliver licensing taking into account the amount bureaucracy thought to be involved.

Table 3: Questionnaire Comments - Emerging themes and issues

Comment Themes (1207 Online Questionnaires analysed)	Landlords Managing Agents (205)	Residents, Tenants & Businesses (855)	Stakeholders (147)	Total
Fees	66	70	3	139
Conditions	73	135	8	216
ASB and PRS evidence base	7	1	0	8
Resourcing and Strategy/ Administration and Regulatory burden for the Council	14 8	6 4	1 1	21 13
Consultation/ Responsibility Scheme Implementation	10 4	12 2	0 0	22 6
Proposal for a Borough wide scheme/Mechanisms already exist to deal with the problem/ Improving PRS standards	0 7 11	9 6 22	3 2 2	12 15 35
Impact on residents, notably tenants	40	59	3	102
Impact on landlords/The importance of managing agents	88 3	45 1	9 0	142 4

3.1 Specific questions and General comments - Residents, Tenants and Businesses

Licensing Conditions

- Questions raised about how the licensing conditions will be enforced, including whether the Council will have the resources to do this effectively

Fees

- Concern that the scheme is a money making enterprise for the Council
- Concern that landlords will pass costs of the scheme on to tenants in the form of rent increases

General comments

- Support for the scheme as a means of making landlords more accountable and responsible
- The scheme should be focussed on rogue landlords rather than all landlords

Anti-social behaviour and the evidence base

- Calls for more police to address anti-social behaviour

- Calls for more community projects to help young people avoid engaging in anti-social behaviour
- Calls for better enforcement and use of existing powers, such as better planning enforcement
- Questions raised as to whether the licensing scheme would be effective at addressing anti-social behaviour

3.2 Specific questions and General comments - Landlords and Managing agents

Licensing Conditions

- Conditions will not improve standards
- Concerns that the scheme will create red tape for landlords

Fees

- Concern that landlords will pass costs of the scheme on to tenants in the form of rent increases
- Concern that the scheme is a money making enterprise for the Council
- Calls to reduce fees

General comments

- The scheme should focus on rogue/problem landlords only
- Concern that rogue landlords will not apply and operate underground/outside of the scheme
- Concern that the scheme will push landlords out of the borough
- Questions asking what is in it/what are the benefits for landlords
- Increased rents cause overcrowding

Anti-social behaviour and the evidence base

- Would licensing be effective in addressing anti-social behaviour
- More police to reduce anti-social behaviour instead of introducing a licensing scheme
- Greater enforcement and use of existing powers to address anti-social behaviour instead of introducing a licensing scheme
- The scheme should focus on social landlords and their tenants which are considered to have greater anti-social behaviour problems
- Cannot blame landlords for anti-social behaviour
- Do not feel that the evidence base sufficiently proves the case for the need for a licensing scheme to address anti-social behaviour
- Greater help for landlords to evict tenants

3.3 Specific questions and General comments - Other Stakeholders

Licensing Conditions

- Questions as to why references are necessary / they are ineffective
- Will the Council have the resources to do this effectively

Fees

- Concern that landlords will pass costs of the scheme on to tenants in the form of rent increases

General comments

- Concerns that the scheme will create red tape for landlords
- The scheme should focus on rogue/problem landlords only
- This will dissuade landlords from renting privately and will reduce stock
- Scheme will achieve improvements where there is robust inspections

Summary of other comments received through the questionnaire

The respondents raised concerns about how the licensing conditions will be enforced, whether they would improve standards, that they would create red tape for landlords and about the council's resources to enforce the conditions effectively. On the subject of fees it was felt that this was a money-making enterprise for the council and that costs will ultimately be passed on to the tenants. There were also calls to reduce fees.

There were other general comments and suggestions, such as giving support to tackling rogue landlords, the impact on landlords and on addressing on the anti-social behaviour problem. Robust inspections were seen as necessary to achieving scheme improvements.



Section 4: Findings from Forums and meetings

Introduction

4.1 This section presents the findings from other consultation activity undertaken during the consultation process. The purpose of these activities were to create awareness of the consultation, to test Brent's proposals for extending selective licensing against landlords' and other stakeholders' opinions – to see the extent of acceptance or capability for development or amendment, and of course to supplement the quantitative consultation through questionnaires.

- One Landlord Forum events was held on the 1st November 2016 attended by approximately 200 participants (landlords were notified and invited to these events as part of the above direct mailings)
- Landlord and tenant representatives deliberative meeting
- Attendance at Brent Connect representing 3 forums (on average the attendance was 25-35 participants per forum)
- Attendances and presentation at Brent Housing Partnership/Association Forum

Overall the meetings sought to represent a cross section of residents, including private tenants, landlords and businesses in a face-to-face environment. Overall the forums probably over-represented landlords rather than private tenants, but it must be noted that individuals may have multiple stakeholder interests.

Each meeting began with an opening presentation or statement stating that Brent proposed to extend selective licensing, that a consultation was being run to find out what people think, and that we wanted people to "HAVE YOUR SAY".

Generally, the introductions covered:

- The private rented sector in Brent – Growth and Impact
- The current position regarding licensing schemes in Brent
- The key consultation proposals
- The consultation process

In most cases the "Have your say" contributions were noted in order to capture detailed views or a balance of opinion from the meeting.

Brent Landlords Forum: 1 November 2016: Brent Civic Centre, 6-11p.m

Introduction

4.2 The Brent Landlords forum is a popular event hosted by Brent in partnership with the Midas Property Club. The event attracts a cross-section of landlords, agents, property investors and property services businesses. The event was widely publicised and promoted internally and externally via direct mail, social media, industry sector and dedicated websites. The forum attracted about 200 participants. We have tried to capture the issues raised, as well as the force of opinion as concisely as possible by assigning themes as shown below.

Issues Raised

4.3 Participants views about selective licensing in Brent

Assigned Theme	Participants views about selective licensing in Brent
General opposition to licensing	<ul style="list-style-type: none"> • The majority of attendees clearly expressed that they were not in favour of licensing. Stating that in their opinion it is a money making scheme • Blanket licensing – Brent Council is building their own empire, money making scheme. I do not agree with it. There are other ways of controlling bad landlords • Landlords with HMO's, in principle this works. However, my problem is, to licence all properties, how are you going to deal with this? • Compulsory licensing, compare this with controlled parking zones (CPZ). Introducing blanket licensing, I fear that it will follow the failure of CPZ's • You don't need a licence to target rogue landlords. Why have you not been targeting rogue landlords before bringing this in?
Delivering the licensing scheme	<ul style="list-style-type: none"> • How would we trust Brent Council to Licence all private rented properties and how many would get licensed? • In general principle, we should not have to accept bad accommodations, but how do we trust the Council to deal with that? • You want 100% licensing, how are you going to find those people? How are you going to enforce that and what is your process?
Anti-social behaviour (ASB)	<ul style="list-style-type: none"> • With regards to ASB, all sorts of properties (tenures) are affected by this not just the private rented sector. Anti-social behaviour is mainly in council estates (applaud from attendees) • How does licensing stop ASB and fly tipping. As a landlord I cannot call up to get fly tipping taken away? • Landlords cannot access the free collection service, only tenants can and we cannot rely on tenants to do that and they may not. Can licensing address this problem? • We shall (do) have ASB, but why are you pointing that to PRS
Impact on Landlords	<ul style="list-style-type: none"> • You "come down" on good landlords • Keeping standards high. All this has done is to drive rogue landlords underground • Regardless of what landlords say you are going to do what you want • Good landlords pay for rogue landlords • This will cause good landlords to leave the PRS, exiting the market
Fees	<ul style="list-style-type: none"> • Fees just get fed in to the Councils coffers • If you inspect and find nothing wrong with property, why don't you refund my fees? • Good landlords pay for rogue landlords • What happens to £540 over the three years, what happens with the money
Supporting good landlords	<ul style="list-style-type: none"> • Council should support landlords more. For example website lacking information and there is a need for improved clarity of information • Working in partnership, tenants go to the council to get advice about landlords. The council will advise them. What about advice for landlords. When you switch on the TV, all you hear about is rogue landlords. What about good landlords? • The importance of section 21 possession claims to selective licensing

Balance of Opinion

4.4 The group demonstrated their specialist interest in the debate and presented cogent arguments with the six themes as listed above emerging. On balance, the forum was clearly against a

blanket selective licensing scheme in principle, sceptical about its merits and delivery, but thought that this may be more appropriate for HMOs. In particular:

They questioned the council's motive e.g. "money making", and felt that efforts should be made to target rogue landlords before introducing licensing. If introduced, the group felt that it would be a huge challenge to identify properties, deal with the poor property conditions and to undertake enforcement against rogues, and therefore questioned the council's capacity to deliver the scheme, and, whilst not denying that ASB is a problem, that tenants and the council should do more to solve the problem and support good landlords rather than introducing licensing which will present additional economic burdens.

Landlord and Tenant Representatives meeting

Introduction

4.5 A total of 15 Landlord and tenant representatives were invited to a meeting by Brent at the Civic Centre on 8th December 2016. The organisations represented at the meeting were:

- Brent Advice for Renters (A4R)
- National Landlords Association (NLA) and
- Residential Landlords Association (RLA)

The meeting lasted for about two hours and the format was an open discussion led by Brent. The meeting opened with introductions followed by a summary of licensing in Brent. The rest of the time was dedicated to the debate on licensing and the representatives "having their say" on the proposals and giving examples and "alternative" views. The final session sought to get the balance of opinion on the specific consultation proposals for extending selective licensing as published.

The NLA and RLA are well known nationally. Advice4Renters (A4R) is the trading name of the former Brent Private Tenants Rights Group, a registered Charity organisation in London for private renters whose goal is to transform the private renting sector through their support and legal advice services for tenants, as well as through campaigning.

Issues Raised

4.6 During the main discussion period a number of important issues were raised by the representatives, including all of the following:

- Similar consultation meeting for tenants
 - Political expectation in general on what property licensing will achieve and that licensing moves are often policy driven
 - Massive growth of the PRS in London
 - The landlords are concerned about the finance lender's approach. Lenders see licensing as a risk to their investment because of the ASB stigma attached to licensed areas and that this is seen as a risk to the property value and leads to mortgages being rejected
 - Change in landlords business models as a result of changes in mortgage interest relief e.g. change to a limited company, entry of cash buyers to the market
 - The willingness of landlords to take LHA tenants
-

- That licensing highlights the existence of subletting and that landlords are sometimes victims of “subletting crime”. The example given highlighted the involvement ~ deliberate or otherwise, of the letting agent, head tenant and sub-tenants, the latter sometimes sleeping in shift patterns
- On the issue of enforcement, the representatives questioned the resources of councils to monitor and prosecute, and further noted the new powers which local authorities will have under the Planning and Housing Act 2016, in particular that councils will be able to retain fines from enforcement, and on the introduction of banning orders
- The above enforcement provisions will be available and in addition consideration should be given to utilising the existing management order provisions
- There is the view that Councils are “squirrelling” away licensing fee income. This is around concerns about reduced local government funding and that councils will be “bankrupt by 2020”
- Going forward, the funding of services is a challenge for politicians and presents a risk to the commitment to employ more licensing officers
- Consideration of using licensing fee for having better standards and also funding tenancy relation officer post from licensing. However a view expressed that this may be illegal. Licensing could be linked with public health intervention for the benefit of tenants
- Tenants referencing – view that referencing may be used maliciously
- The tenants led group supports licensing and favours a national scheme. Reflects that the onus is on the landlord to run their business properly
- Alternative PRS regulation – Doncaster has “half way house”
- Concerns that dealing with poor conditions is “slipping through the net” where Brent’s good landlords are paying for the bad landlords. This led to discussion around licence fee discounts for accredited members for which there was total support.
- Accreditation – Observation that there was a recent spike seen in Peterborough City Council where there is a heavy discount and that an option is to increase fee but discount (albeit legal opinion) more
- All landlords support criminal landlords being prosecuted and that the worst (approximately 3k) bad landlords should be targeted

Responses to consultation proposals

4.7 On the proposal to;

- (a) *extend selective licensing to all or some wards within Brent*

Both representatives support extending selective licensing. However there was a different view from the landlord and tenant representatives in that the landlords favour extending to areas where there is a problem rather than blanketing and that to avoid a “cash cow” situation. Look at “hotspots”

The tenant’s representative supports extending selective licensing to the entire borough “because you know where you are and easier to manage”. Same standards will apply across

Examples of recent blanket or wide schemes mentioned were in Peterborough and Burnley and such scheme are subject to Secretary of State for DCLG confirmation

- (b) *That the existing designation which applies to Harlesden, Wembley Central and Willesden remains in force up to 31st December 2019* – fully supported
- (c) *The consultation exercise* - supported
If applied should be evidence should be based on ASB and one or several of the new criteria – supported
- (d) *Fee proposal* – Recognition that the current basic licensing fee is low and should aim to keep the fee as low as possible by evidence led targeted inspections, giving notice to
-

landlords, and when processing applications should maintain a presumption in favour of granting a licence.

Other comments

- Delays and investigations into processing licences should be evidence led e.g. complaint received
- Brent should consider what is realistic and licensing should be used as a “start of an education rather than the solution”.

Brent Connect meetings

Introduction

4.8 Brent Connect forums are regular meetings, covering five local areas and are an opportunity for residents to give their views on local issues and proposals and take part in consultations about the council’s activity. They are used as part of the local democracy process to help decide priorities and policies for Brent. Three forums fell and were attended giving a coverage 11 of the 21 wards in Brent;

- Brent Connects Harlesden, which covers the wards of Harlesden, Kensal Green and Stonebridge was attended on 26 October, 2016, 7-9pm
- Brent Connects Kingsbury and Kenton, which covers the wards of Barnhill, Fryent, Kenton and Queensbury, 16th November 2016, 7pm, and
- Brent Connects Willesden, which covers the wards of Dollis Hill, Dudden Hill, Welsh Harp and Willesden Green – 9th November 2016. 7pm. Total attendance = 48.

4.9 Issues raised at the Brent Connects Harlesden forum

- The ability and officer resources to follow through with inspections if the licensing is extended borough wide
- Identifying overcrowding
- Identifying the landlord
- The consideration of the 20% rule
- Dealing with beds in sheds
- Possibility of enforcing against property freeholders regarding disrepairs

Balance of opinion

4.10 Forum attendees were supportive of efforts to the problems being caused by private renting in Brent but needed to be assured that the council would be able to deliver licensing if extended.

Brent Housing Partnership and Brent Registered Providers Forums

4.11 Brent Housing Partnership (BHP) is an arms-length management organisations (ALMO) and community housing company owned by Brent Council. While the council owns the homes and takes responsibility for housing policy and strategy, BHP is responsible for the day-to-day management of housing services to over 9,500 council tenants and 3,000 leaseholders.

A presentation on licensing in Brent titled “raising the standard in the private rented sector” was made to the forum on 28th September 2016 and later circulated to the forum members. The forum includes all of the following housing associations: - Asra; A2dominion; Catalyst HG; Family mosaic; Genesis HA; HCHA; Hyde-housing; Metropolitan HT; Network HG; LQ group; NHHG; Octavia; Origin housing. A further meeting was attended on 7th December 2016.

Home Safe Scheme Limited meeting

Introduction

4.12 The Home Safe Scheme Ltd (www.thehomesafescheme.org.uk) is a private sector co-regulation partner organisation that was set up as a result of the implementation of a Selective Licensing schemes and now works with Doncaster MBC and West Lindsey District Council.

Two representatives from the Home safe scheme met at the Brent Civic Centre on 23rd December 2016. We acknowledged the written submission received, noting that we had not read through the paper and therefore this meeting was not a response. The meeting was to create an understanding of the scheme with a view to seeing whether it, or what features of it, may be applied to licensing in Brent.

The meeting lasted for about two hours and the format was an open discussion led by Brent. The meeting opened with introductions followed by a summary of licensing in Brent. It was clear that the concept was that of co-regulation to work alongside selective licensing. Reference was made to schemes at Doncaster MBC, Blackpool Borough Council and West Lindsey District Council as examples.

During the discussion period a number of important issues were raised by the representatives, including all of the following:

- Co-regulation concept – Selective licensing is still introduced and all landlords must obtain a licence from the council
 - The Code of Practice
 - Use of Charters- exploring through breach management action and response levels
 - Compliance checks
 - Benefits to landlords signing up to the Home safe scheme e.g. B&Q trade discounts, financial (Lloyds Bank) support, Nuffield Health membership
 - What do landlords get for the fee? Need to consider methods such as process chains, value chain analysis, value (stream) mapping
 - Co-regulation and licensing to How to create Process chain. The political expectation in general on what property licensing will achieve and that licensing moves are often policy driven
-

- Ways of supporting landlords
- Tenants Charter e.g. covering ASB where new tenants are encouraged to sign up
- Discounts on licensing fee implications
- Consideration of the scheme's application to the London PRS context and in particular to the Brent existing PRS regulation
- Accreditation implications
- Home safe membership is voluntary but are there certain landlords/licensed applications where co-regulation could be targeted to, either as a licensing condition or to certain groups or sectors e.g. addressing public health, vulnerable tenants and private student accommodation.

Other comments

- The scheme could be tailored to Brent
- Scheme success - Doncaster MBC, one-year scheme review reported measured reduction in ASB, noise, housing complaints etc.,
- Next step could be a workshop to explore features that may be adopted

Section 5: Written submissions

Introduction

- 5.1 This section presents the findings from other consultation activity undertaken during the consultation process such as:
- 10 individual e-mails plus 1 letter emailed
 - 4 written formal submissions from the, National Landlords Association, Residential Landlords Association, National Association of Letting Scheme and Home Safe Scheme Ltd. The formal written submissions are attached as appendices to this report with summaries below.

Summary of email and letters

- 5.2 The views and opinions expressed in the various emails, letter and submissions were recorded. Any representations made were considered and captured as a bridging document as will form part of the Council's formal response. As best as ascertained it appears that the respondents are a mix of residents, private tenants and landlords with over over-dominance of any group.

Email comments

- Support for widening the scheme so that it applies to most or even all of Brent, notably to North Wembley and Sudbury
 - Fees should be dramatically increased as other councils charge more
 - It is not true that there are strong links between ASB and the privately rented properties
 - Licensing makes the private renting business harder and does not solve poor property conditions
 - For a variety of reasons stated, that the standard enforcement regime will be very complicated, time-consuming and expensive
-

Summaries of written submissions

National Landlords Association (NLA) submission summary

5.3 The NLA contends that there are flaws in the process and proposals which must be rectified prior to attempting to progress this application. Furthermore, once the necessary data has been identified and provided, this consultation exercise should be repeated (if permissible), ensuring engagement with all relevant stakeholders. The NLA's position has been summarised by the following brief points:

- Landlords have very limited authority to deal with matters related to anti-social behaviour (ASB), especially if it happens outside the curtilage of the property.
- The scheme will lead to a further displacement of problem tenants in Brent/London.
- The documentation provided fails to indicate that sufficient funding will be available to support the functions necessary to support licensing in cases involving re-housing, tenants with mental health issues and social inclusion.
- Questions how will the Council prevent malicious ASB claims being made that could potentially result in tenants losing their tenancies?
- Selective licensing is not a solution in itself – it does not tackle sub-letting or criminals.

However they state that the ability to introduce licensing is a powerful tool. If used correctly by Brent Council, it could resolve a number of specific issues, as has been seen in the three wards in which the scheme is currently run in. The NLA has supported many local authorities when licensing schemes have been introduced that could benefit landlords, tenants and the community. But to extend the scheme Borough wide they believe is unjustified.

Residential Landlords Association (RLA) submission summary

5.4 The RLA believes that Brent is premature in bringing forward its proposals and should wait further given the new powers that will be made available to local authorities in the Housing and Planning Act 2016. The RLA's submission opposing licensing based upon:

- a) A number of general objections licensing and,
- b) Several areas of concern regarding selective licensing.

Reasons for the general objection cited were that:

- Licensing schemes rarely meet their objectives
- Rather than introduce a bureaucratic licensing scheme that will see staff time wasted processing applications, it should continue to direct its limited resources at effective enforcement activity.
- Tenant problems such as anti-social behaviour are impossible for the landlord to address alone and landlords will not wish to risk a breach of licensing conditions that may affect their ability to let properties elsewhere.
- The RLA does not believe Brent has made a robust case for borough-wide licensing.
- Concern that licensing costs are passed on to tenants in the form of rent increases and that, should the council decide to proceed, they welcome the consideration of discounted fees for landlords
- The RLA supports a system of self-regulation.

The areas of concern in regard to selective licensing relate to certain emerging trends such as the administrative burden, the use of the licence fees, tackling criminal landlords and proper systems for monitoring the schemes.

National Association of Letting Scheme (NALS) submission summary

- 5.5 NALS is an accrediting organisation for lettings and management agents in the private rented sector. NALS support the council's wider objective around driving up standards and conditions in the private rented sector. They however suggest that based on the evidence that has been published, they do not think the case has been proved to extend selective licensing borough wide. They have however provided some technical advice as to how the proposals should be developed in order for a scheme decision proceed. NALS express the following views and suggestions Brent's proposal including;
- The roll-out of new licensing schemes is the lack of consistency that this brings in the regulation of the private rented sector.
 - Encourage the council to place any new scheme on hold given the government's recent decision to expand the mandatory HMO licensing scheme in 2017.
 - The new licensing scheme would need to be enforced using the same 'complicated, time-consuming and expensive' regime that the council is already finding problematic.
 - Encouraged opportunities for co-regulation, better regulation of letting agents and *stepping up* of enforcement activity
 - Welcome the proposal to offer an early bird discounted fee of £340. Overall, that the proposed application fee of £540 per property is less excessive than fees being charged elsewhere but should consider further fee discounting

Home Safe Scheme Limited submission summary

- 5.6 Home Safe Limited agrees that there is a problem with some private rented sector properties in Brent and commends Brent them for having taken action to deal with this problem. As part of their business rationale Home safe supports selective licensing but proposes that Selective Licensing can be made effective by the mechanism of "Co-regulation".

In outlining the merits and benefits of co-regulation, Home Safe argues that their alternative scheme will enable Brent Council to use their existing powers and resources more effectively and in a more targeted manner allowing them to focus those resources directly against the willingly bad, un-cooperative and non-complying landlords. They would, therefore, welcome the opportunity to work with the Brent Council in developing a "Co-regulation" scheme for the relevant remaining wards.

Summary of other comments

- 5.7 These comments have been organised by the following themes:
- General comments
 - Fees
 - Licensing conditions
 - Anti-social behaviour and the evidence base

- 5.8 Overall, the findings from these other consultation activities are very much in line with the comments and findings received through the consultation survey. In general terms, Landlords generally expressed opposition and in some cases significant opposition to the proposals. There was limited support provided by a small number of residents and landlords and indicative support through a written submission from Shelter (see appendix 3). The following outlines the details of some of the challenges and opposition.

General comments

- Concern that rogue landlords will not apply and operate underground/outside of the scheme, the expectation is that only good, compliant landlords will apply for a licence.
 - The scheme should focus on rogue/problem landlords only and not penalise good landlords.
 - Concern that the scheme will push landlords out of the borough, reducing the supply of private rented sector housing.
-

Fees

Note: Along with comments about anti-social behaviour and the evidence base, opposition to the proposed fee structure was the biggest area of challenge and comment.

- The fee is considered far too high for most landlords and there are calls to reduce fees.
- There are proposals to reduce the fee for compliant landlords and/or landlords working with reputable letting agencies.
- Proposals to charge fees in line with the size of the property/rent received and against the idea of a flat fee.
- Concern that the scheme is a money making enterprise for the Council.
- Some landlords and residents expect that the fee will be passed on to tenants, raising rental prices for tenants.

Note: The Residential Landlords Association's (RLA) written submission presents a case against the consultation designation proposal, suggesting it could be challenged.

Licensing Conditions

- Questions raised about how the scheme will be enforced and the associated inspection regime, with suggestions that this could be unmanageable for the Council, landlords and tenants. There were concerns that the licensing scheme will not be effectively enforced and therefore fail to deal with rogue landlords or anti-social behaviour.
- Concerns that the scheme will create red tape for landlords, pushing up costs and making it less desirable to rent properties in the borough which could have a consequent impact on the supply of private rented housing.
- Concerns that there are too many licensing conditions.
- Concerns that some of the wording associated with licensing conditions is ambiguous and open to interpretation such as the definition and criteria for 'fit and proper' person.
- Do not believe that the licensing conditions will improve standards as most good landlords already comply and in some cases exceed the conditions.

The written submission from RLA provides detailed comments against each of the conditions and proposes alternative conditions.

Anti-social behaviour

Along with comments around fees, anti-social behaviour and comments about the evidence base were the biggest areas of challenge and comment.

- Greater enforcement and use of existing powers to address anti-social behaviour instead of introducing a licensing scheme such as use of Interim Management Orders (see National Landlords Association comments at appendix 3 for more detail).
- The scheme should focus on social landlords and their tenants which are considered to have greater anti-social behaviour problems than tenants of private rented properties.
- Some landlords do not believe that the licensing scheme will have a notable impact on anti-social behaviour as landlords are not responsible and should be blamed for anti-social behaviour.

Evidence base

The largest single number of comments and challenges were about the evidence base linking anti-social behaviour with private rented properties. These were as follows:

- The evidence base shows only correlation, not causation between private rented housing and anti-social behaviour
 - Requests for further analysis of the evidence base to show if there are similar links between other housing types such as social housing and owner-occupiers, with the hypothesis that there are likely to be similar or more significant links between social housing in particular and anti-social behaviour
 - Contention that a blanket scheme is appropriate as anti-social behaviour levels differ between different parts of the borough and so if adopted should only be adopted for certain areas in the borough
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Appendices

Appendix A: Consultation Activities Report

Appendix B: PRS Licensing 2016 Questionnaires

- Residents, Tenants and Businesses in Brent
- Landlords and Managing Agents
- Other Stakeholders

Appendix C: Questionnaire Survey Results

Appendix D: Written Submissions

- NLA Submission
- NALS Submission
- Home Safe Scheme Ltd Submission
- RLA Submission

Appendix E: Questionnaire Survey Raw Tables

Appendix A: Consultation Communications Activities Report

The consultation ran for 11 weeks from 30 September 2016 and closed on Friday 16 December 2016, although the web-link remained open 19 December. The communications campaign aimed to get as many people and sections of the community to engage with the consultation. The target was to obtain 1, 000 responses by 16 December, including at least 500 from non-landlords, specifically tenants and neighbours of privately rented properties.

This report details activity in all communications channels as outlined in the communications plan which was agreed before the consultation started together with any additional work.

Strategy

The aim was to use our customer insight to target our communications and evaluate their impact. The strategy was to use a broadly based communications drive with a mix of all channels to deliver consistent integrated messages. We used wide reaching tactics aimed at targeting all residents and stakeholders with more specific channels being used to reach tenants and landlords.

Key messages

- If you're a tenant or a landlord, if you live or run a business in Brent, have your say on our plans to expand our scheme to raise standards for privately rented homes. Go to www.brent.gov.uk/landlordlicensing to take part in the consultation.
- The whole community will benefit from our proposals. Local people will have better homes, neighbours will be reassured and it will be good for landlord's businesses.
- The vast majority of landlords are honest, fair and law-abiding. Our proposals aim to deal with both the minority of private landlords who give their tenants a raw deal and the minority of tenants who behave anti-socially.

Communications channels

The vast majority of the work was focused on an external audience, although internal channels were used to engage staff whose work is public facing to act as ambassadors for the consultation and encourage more responses. Staff who live in or around Brent and who also may be private tenants or landlords were also encourage to themselves take part in the consultation.

The channels are listed below, followed by an analysis of activity carried out in each one individually.

External

- Media relations
 - Brent website (banner on homepage)
 - Poster sites (JC Decaux)
 - Leaflet drop to all residents & in libraries and council buildings
 - Digital adverts on Gum tree and EBay
 - The Brent magazine
 - Social media (face book& twitter)
 - Emails to landlord database
 - Emails to stakeholder groups, e.g. housing needs database
-

- Stalls in Civic Centre and local businesses
- Landlord Forum
- Brent Connects
- Brent Citizens Panels
- Voluntary Sector
- Mail out to stakeholders
- Advertising van
- Presentations to stakeholders, e.g. Barnet Landlords Forum
- Report to Brent Members of Parliament
- Briefing to the Chartered Institute of Environmental Health Officers (CIEH) Housing Study & Licensing group
- UK Landlords Accreditation Scheme circulation

Internal

- Stall in Civic Centre
 - Yammer
 - Word of mouth amongst colleagues, teams and the wider organisation.
 - Email footers
 - Presentation to internal stakeholders, e.g. Brent Housing Partnership
 - Briefing session for elected members
-

Media relations



Two press releases were issued during the course of the campaign, one at the start to announce it (03/10/16) and one half-way through (15/11/16) to encourage more responses. The releases were sent to local media (Brent & Kilburn Times, and GetWestLondon.co.uk), also to housing and environmental services trade press.

Our residents survey of 2014 shows that 6% of our residents say that their primary source of news information is the Brent & Kilburn Times.

Coverage of the consultation featured in the [B&K Times on 04/10/16](#) and on [17/11/16](#) in both the paper editions and online and throughout the campaign in trade press including [Londonlandlords.org.uk](#), [lettingagenttoday.co.uk](#) and [londonpropertylicensing.co.uk](#).

Coverage from Landlord Property Licensing is particularly relevant as it is the leading trade body with a wide reach and influence within private landlords as a group.

Media reach

The B&K Times has a circulation of around 15,000 and 56,048 average monthly visitors to their website and 208,140 average monthly page impressions. Their e-edition has 741 average monthly views with 26, 891 average monthly page impressions. GetWestLondon.co.uk has xxx monthly/weekly visitors. The online trade press have around 10,000 visitors per month combined.

Media coverage providing context

Successful prosecutions of rogue landlord stories featured during the consultation period with three stories in the local and trade media. Although not specifically about the consultation they provide a context to the campaign and motivation to take part in the survey by highlighting the issue of the benefits of licensing as this was also part of the messaging of the news stories. The stories were Buxton Road (01/12/16), [Beverley Gardens](#) (07/12/16) and Mapesbury Road (04/12/16).

Brent website

During the period of the consultation we had a banner news item on our homepage and there were 450 unique page views to www.brent.gov.uk/landlordlicensing. This represents residents who clicked on the news item. It does not include those who went via a search engine or via the web advertising directly to the surveys. The Brent website receives an average of 300,000 visitors and over a million page views every month.

Online news stories

Both press releases were also used as news stories on the website with a total of **4592** unique visitors to both pages during the period of the consultation.

(a) 03/10/16:

<https://www.brent.gov.uk/council-news/september-2016/improving-the-private-rented-sector-should-brent-extend-private-rented-property-licensing/>

Unique Page Views = **3970**

(b) 15/11/2016

<https://www.brent.gov.uk/council-news/press-releases/pr6439/>

Unique Page Views = **622**

Poster sites

Posters advertising the consultation were displayed on the large bus stop sites throughout the borough for a period of four weeks from 5 November to 2 December. There were a total of 76 sites including outside high footfall Brent landmarks such as tube stations, shopping areas, Wembley Stadium and the Civic Centre.

Leaflet mail out to all residents

On 9 November we sent out a leaflet to all households in Brent, a total of 100,000 with copies also placed in council buildings such as libraries.

Digital advertising

From 7 November to 9 December Navigate Digital placed adverts on EBay and Gum tree websites to drive traffic to our website and encourage completion of the online survey. Only visitors to these websites from postcodes within Brent saw the adverts and users searching rental listings were particularly targeted.

The results of the campaign are below:

- Total impressions delivered: 4,070,008 -
- Unique users reached: 630,782
- Traffic to Landlord Survey: 6,050 – 4,228 (69%) via homepage

The Brent Magazine

Our residents show that 47% of residents say this is their main source of news about the council. The magazine has a circulation of 105,000, and is delivered to all households in the borough, with additional bulk drops to all council buildings with public access such as libraries. It reaches 320,000 readers monthly and is heavily promoted through our social media channels.



In the [winter edition of the Brent magazine](#) we had a double page feature on the campaign, explaining the background and aims. One page of the double feature was the advert to take part in the consultation and signposting to the website, and how to get a paper copy of the survey.

The magazine is also online on our website and is read online by between 1,300 and 1,600 residents each month, who spend an average of 3.5 minutes on the pages.



Social media - Twitter

Twitter

During the campaign we sent out a total of 12 tweets, which received 5 engagements (likes or re-tweets) using the hashtag #Brentlandlordlicensing.

The Brent Twitter account has 14,700 followers.

Social media - Face book

We posted 5 adverts during the course of campaign which had a total of 29 shares, likes and comments. The Brent Face book account has 5,585 friends.

Communications to landlords and stakeholder groups

We sent a total of three emails to our landlord database which contains 393 addresses, containing a link to the consultation and a summary of what it was about. The first was sent at the start of the campaign, the second on 02/12/16 with a reminder that there was only two weeks left to take part, and the final on 14/12/16 with a two days left reminder.

We sent two emails to the housing needs database, which contains 334 addresses, one at the start of the campaign and one on 14/12/16 with a two days left reminder.

We sent an email to 80 stakeholders on 05/12/16, another one to 19 registered housing providers on 05/12/16. We sent a letter and copies of the consultation to 85 stakeholders by post. All stakeholders are connected to the organisation, and are established contacts to receive information from Brent.

Stands in Civic Centre and retail locations

Between 03 November and 13 December we held a total of seven public information stands in the Civic Centre, large retail locations and council buildings throughout the Borough. Passers-by were invited to take part in the survey, either by completing a paper copy, taking one home to return or completing one online with Brent officers using handheld tablets. They were as follows:

Date	Location	Surveys completed
03/11/2016	Civic Centre	65

09/11/2016	Costco, Wembley Park	42
17/11/2016	Willesden Green Library	38
24/11/2016	Civic Centre	44
30/11/2016	Kingsbury Library/High Road	36
09/12/2016	B&Q, Cricklewood Broadway	47
13/12/2016	ASDA Wembley	38
Total		310

Landlord Forum

On 1st November Brent hosted a meeting of the Landlords Forum which is a non-profit making organisation of private landlords and agents who rent property in West London. Around 200 people attended and a presentation was given about the consultation, directions to the website to complete the survey online, and paper copies of the consultation given out. An email was sent out the following week to all attendees and members of the group who did not attend, with a reminder of the consultation and how to take part. The event was held at Brent's Civic Centre with Midas Property Club as our delivery partner and registration hosted on the *Eventbrite* site.

Brent Connects

A total of three Brent Connect forum meetings were attended and a presentation given on the consultation. Brent Connect forums are regular meetings, covering five local areas and are an opportunity for residents to give their views on local issues and proposals and take part in consultations about the council's activity. They are used as part of the local democracy process to help decide priorities and policies for Brent. At these meetings paper copies of the survey were available, and attendees were signposted to the website to complete an online survey.

Voluntary Sector Forum

A presentation on the consultation was made to the Voluntary Sector Forum on 7 December, attended by 30 individuals working in the voluntary sector with or in partnership with Brent.

Advertising van

During the week commencing 7 November an advertising van drove around the borough with a large advert for the consultation.

Yammer

Yammer is the primary internal communications tool for Brent employees. It is a private social network where employees are encouraged to post information, have conversations and find news about the organisation. Of Brent's 2,200 employees, 98% are signed up to the network.

Two posts were made to the all company group, on 10/11/16 and 03/11/16 with a total of 2 replies and 16 likes. The channel is important because many employees are residents in Brent, including in the private rented sector, or are landlords.

Word of mouth

During the period of the consultation the private rented sector teams acted as ambassadors for the consultation, encouraging both employees and members of the public to take part. This was done either formally in team meetings or in general conversations with other teams throughout the council.

Evaluation

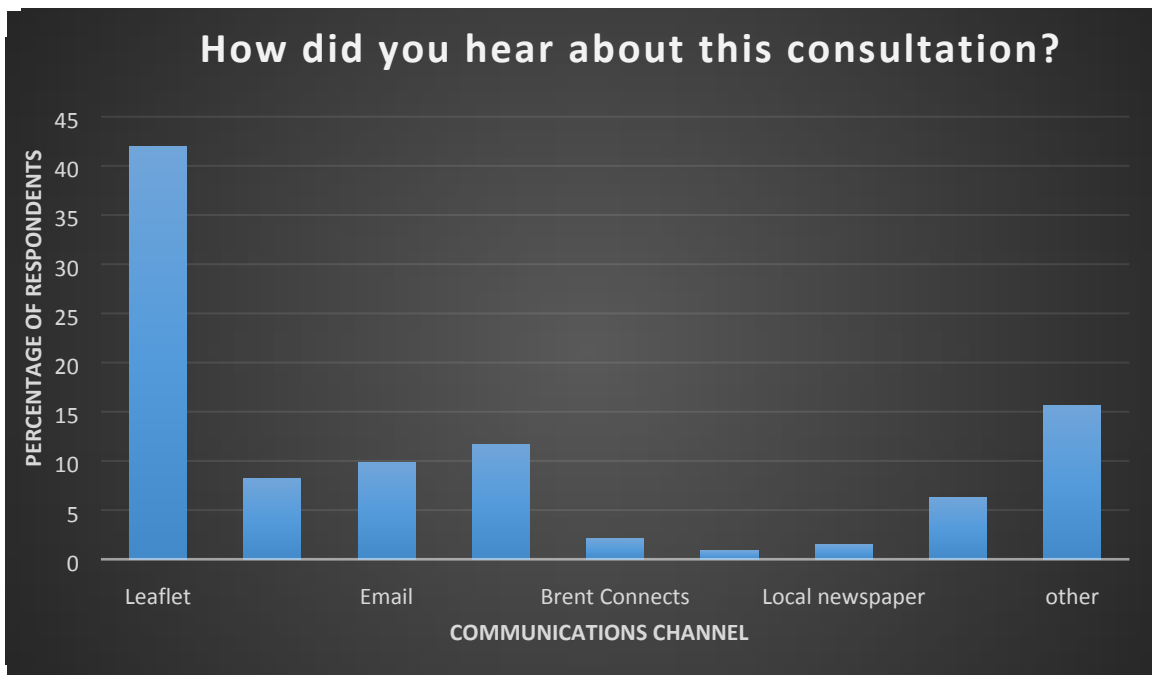
Evaluation measures agreed before campaign started	
1	Number of responses received Target: 1, 000 Received: 1237
2	Number of news stories published in papers and online. 12
3	Emails and paper mail outs to landlords and stakeholders 7
4	Cost per action on digital adverts £2.23
5	Click through rates on digital adverts 2, 630
6	Unique visitors to Brent Webpages with information on the consultation (homepage banner and news stories) 4592
7	Social media engagements face book & twitter 34
Additional evaluation measures	
8	Number of Yammer posts and engagements 2
9	Number of rogue landlord news stories during campaign 3
10	Question in survey "How did you hear about the consultation?" See separate tables for landlords and residents & other stakeholders.
11	Number of people completing survey at stalls at Civic Centre & other locations. 310

12	Landlords forum – attendees (01/11/16)	Approx.250
13	Voluntary Sector Forum event attendees (07/12/16)	30

Evaluation using the question in the consultation

Included in the consultation questionnaire was a question near the end “How did you hear about the consultation?” The responses are below. The clear leader in terms of successful reach is the leaflet with nearly 42% of all respondents naming this as how they had heard about the consultation. The Brent website (11.7%), emails (9.8%) and posters (8.2%) were all roughly similar after that.

Comments in the free text areas of the questionnaire for those who chose the response ‘other’. Twitter is only mentioned once, as is yammer, with the most popular response being that it was through the in-store surveys and at the Civic Centre, with more than 50 people giving this answer.



APPENDIX B: Questionnaire - Residents, Tenants and Businesses

PRIVATE RENTED SECTOR LICENSING 2016 QUESTIONNAIRE: RESIDENTS, TENANTS AND BUSINESSES IN BRENT

PRIVATE RENTED SECTOR LICENSING 2016 QUESTIONNAIRE: RESIDENTS, TENANTS AND BUSINESSES IN BRENT

ABOUT YOU

Which of the following best describes you? (Please select one option)

Private tenant living in a single family dwelling (for example, a self-contained flat or house)

Private tenant living in a House in Multiple Occupation (HMO) or bedsit where you share some basic amenities (for example, toilet, bathroom, kitchen) with others

Local authority (Brent Housing Partnership) tenant

Housing association tenant

Owner occupier – either owning outright or buying with a mortgage

Shared owner – with a share in the equity of the home (Local business in Brent (but not a landlord, for whom there is a separate questionnaire)

Other interested party

If other interested party, please give details:

LOCAL PROBLEMS

How would you rate the following problems in your local area? (Please select one answer for each problem)

	VERY SERIOUS PROBLEM	SERIOUS PROBLEM	MINOR PROBLEM	NOT A PROBLEM
Nuisance neighbours (including intimidation and harassment and street drinking)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Drug use/drug dealing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
General street scene (including graffiti) and excessive 'to let'/'for sale' boards)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rubbish dumping and fly tipping	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
High levels of overcrowded properties	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Untidy front gardens	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Poorly managed and maintained homes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
High turnover of residents in the local community	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Street prostitution and brothels	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
High rent levels	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lack of community engagement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Empty/boarded up properties	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Levels of migration	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tenants sub-letting	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tenants being aware of their legal responsibilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Police reported crime in Brent e.g. burglary	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

LOCAL SOLUTIONS

Thinking about how the private rented sector as a whole in Brent might be improved, to what extent do you agree or disagree with the following statements? (Please select one answer for each statement)

	AGREE STRONGLY	TEND TO AGREE	NEUTRAL / NEITHER STRONGLY	TEND TO DISAGREE	DISAGREE STRONGLY
Brent Council should intervene in areas suffering from high levels of anti-social behaviour	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Brent Council should have more control over the way private landlords manage their properties	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Licensing of the privately rented sector will help to reduce anti-social behaviour in the borough	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Licensing of the privately rented sector will ensure that properties in poor condition are properly managed to prevent further deterioration	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Licensing of the privately rented sector will ensure that people who occupy properties do not live in poorly managed housing or unacceptable conditions	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Licensing of the privately rented sector will help to preserve and improve the social and economic status of the local area	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Licensing of the privately rented sector will reduce the impact of criminal activity on residents and businesses in Brent	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

To what extent do you agree or disagree that private landlords should take the following actions? (Please select one answer for each statement)

	AGREE STRONGLY	TEND TO AGREE	NEUTRAL / NEITHER STRONGLY	TEND TO DISAGREE	DISAGREE STRONGLY
Keep their properties in good condition	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Obtain references for new tenants wishing to move in	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ensure tenants know anti-social behaviour is unacceptable and act to address it	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Provide tenants with the landlord's contact details	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

SELECTIVE LICENSING CONDITIONS

The council has discretion to set precise conditions of the license. These can include conditions relating to use and occupation of the house, and measures to deal with anti-social behaviour of actual tenants or those visiting the property. There are also certain mandatory conditions which must be included in a license. For example, licensees are required to:

- Present a gas safety certificate annually to the LHA, if gas is supplied to the house
- Keep electrical appliances and furniture (supplied under the tenancy) in a safe condition
- Keep smoke alarms in proper working order
- Supply the occupier with a written statement of the terms of occupation
- Demand references from persons wishing to occupy the house

Full selective licensing conditions can be found at www.brent.gov.uk/media/16403028/selective-licensing-conditions-booklet.pdf

To what extent do you agree or disagree that the proposed selective licensing conditions are reasonable? (Please select one answer for each problem)

	AGREE STRONGLY	TEND TO AGREE	NEUTRAL / NEITHER STRONGLY	TEND TO DISAGREE	DISAGREE STRONGLY
Poor amenities (e.g. toilet, bathroom, kitchen, storage etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Poor fire safety (e.g. means of escape, extinguishers etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Property in a poor state of repair	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Poor management of internal common parts	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Too little space/too many people/overcrowding	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lack of energy efficiency in the property	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Damp and mould	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Poor noise insulation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Personal safety and fear of crime	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Illegal extensions/extensions without planning permission	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Unkept external appearance and lack of maintenance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Refuse problems including overgrown gardens with accumulations of rubbish and abandoned/dumped household items	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Noise/disturbance from neighbours who are private tenants	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other anti-social behaviour by private tenants including drug taking/dealing and street drinking	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Harassment/discrimination	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fear of eviction	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Insecure tenancy/tenancy agreement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you 'tend to disagree' or 'disagree strongly' with the proposed selective licensing conditions, please tell us why:

TACKLING PROBLEMS

Selective Licensing is already in place in Willesden Green, Harlesden and Wembley Central and applications from landlords have seen a high number of properties licensed.

In your opinion, should the council extend selective licensing for single family dwellings (for example self-contained flats or houses) in Brent? (Please select one answer)

Yes, borough-wide No
 Yes, but only where I own/let property Don't know
 Yes, but elsewhere in Brent

If yes, but only where I own/let property, please specify:

If yes, but elsewhere in Brent, please specify:

In your opinion, would introducing Selective Licensing achieve any of the following? (Please select all that apply)

- Shift the reliance away from using resident complaints to identify problems
- Promote a professional management ethos amongst private landlords
- Provide tenants with consistent information on acceptable standards of accommodation
- Allow the council to take action against landlords who provide poor standards of accommodation
- Remove rogue landlords from the sector
- Reduce the level of anti-social behaviour in the borough
- Provide safe homes for tenants to live in
- Provide a strategic approach to managing their sector
- Allow the council to take action against landlords whose tenants cause persistent anti-social behaviour

MORE ABOUT YOU

Please tell us a bit more about you to help us ensure that all our services are delivered fairly. We appreciate that some of these questions are personal. We ask for this information to help us ensure that we are meeting the needs of all our service users. If you do not wish to answer one of the questions, please select 'prefer not to say'. The information will be treated confidentially in line with the Data Protection Act 1998.

Please tell us your postcode:

How long have you owned property/properties in Brent? (Please select one answer)

Less than one year One to two years Two to five years
 Five to ten years More than ten years Don't own a property in Brent

MORE ABOUT YOU

Are you? (Please select one answer)

Male Under 18 18 - 24
 Female 25 - 34 35 - 44
 Prefer not to say 45 - 54 55 - 60
 61+ Prefer not to say

How would you describe your ethnic background? (Please select one answer)

White: English/Welsh/Scottish
 Northern Irish/British
 White: Irish
 White: Gypsy or Irish Traveller
 Any other White background
 White and Black: Caribbean
 White and Black: African
 White and Asian
 African: Black/African/Caribbean/Black British
 Caribbean: Black/African/Caribbean/Black British
 Any other Black/African/Caribbean background
 Chinese/Asian/Asian British
 Bangladeshi/Asian/Asian British
 Pakistani/Asian/Asian British
 Indian/Asian/Asian British
 Any other Asian background
 Arab
 Any other mixed/multiple ethnic background
 Any other ethnic group
 Prefer not to say

What is your age group? (Please select one answer)

Heterosexual/straight Other
 Lesbian Gay man
 Bisexual Prefer not to say

What is your religion or belief? (Please select one answer)

Buddhist Christian
 Hindu Jewish
 Muslim Sikh
 None Prefer not to say
 Other

How did you hear about this consultation? (Please select all that apply)

Leaflet Poster
 Email Brent website
 Brent Connects Word of mouth
 Brent Citizens' Panel Local newspaper
 Other

Do you have any long-standing illness, disability or infirmity? (Long-standing means anything that has troubled you over a period of one or that it likely to affect you over a period of time)

Yes No

HAVE YOUR SAY

Should we extend private rented property licensing?

Since we introduced our selective licensing scheme for all private rental properties in Harlesden, Willesden Green and Wembley Central at the end of 2014, we've made great strides in tackling rogue landlords.

We're now running a consultation to find out what the people of Brent and other stakeholders think about extending the scheme so it applies to most or even all the borough.

Licensing is proven to help tackle antisocial behaviour and overcrowding, and this year alone we've reduced over 100 unlicensed or license-breaching properties and successfully prosecuted 43 landlords, resulting in fines over £200,000 and, in one case, a four month jail sentence. We've done this because we think that it's not fair that landlords should get away with cramming tenants into unsafe, unfit housing.

For more information about the consultation and to complete the online survey, go to www.brent.gov.uk/privateletting2016. You can also email: privateletting@brent.gov.uk or post your comments to: Tony Jemmett, Private Housing Services, Brent Civic Centre, Engineers Way, Wembley HA9 0FJ.

Appendix B: Questionnaire – Landlords and Managing Agents

ABOUT YOU

Which of the following best describes you? (Please select one answer)

Landlord who manages their own property Managing agent
 Landlord who uses a managing agent Registered social landlord
 Letting agent Other interested party

If other interested party, please give details:

Type/number of properties owned/managed in Brent:

(Please select one answer for each question)

	1-5	6-10	11-20	21-50	51-100	100+
Single occupancy house	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Self-contained flat	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Houses in Multiple Occupation (smaller than three storys)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Houses in Multiple Occupation (three storys or more)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Are you a member of any of the following? (Please tick all that apply)

National Landlords Association (NLA) ARLA Association of Residential Lettings Agents
 Residential Landlords Association (RLA) Other landlord or lettings agent association

If other related association, please specify:

Are you an accredited landlord or agent? Yes No

Which scheme? E.g. UKLAS/LLAS, NLA, RLA

LOCAL PROBLEMS

As a landlord or agent in Brent, how would you rate the problems identified below? (Please select one answer for each problem)

	LARGELY STRONGER	TENDS TO POSE	NEITHER STRONGER OR WEAKER	TENDS TO IMPROVE	LARGELY WEAKER
Poor quality private rented housing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Poorly managed private rented houses (by others)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rubbish dumping and fly tipping	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Untidy front gardens	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Nuisance and anti-social behaviour by your tenants	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Nuisance and anti-social behaviour by others	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

LOCAL SOLUTIONS

Thinking about the private rented sector as a whole in Brent, to what extent do you agree or disagree with the following statements? (Please select one answer for each statement)

	LARGELY STRONGER	TENDS TO AGREE	NEITHER STRONGER OR WEAKER	TENDS TO DISAGREE	LARGELY WEAKER
Street prostitution and brothels	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Difficulty finding tenants	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Empty properties affecting rental income	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
High turnover of tenants	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Levels of migration	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tenants sub-letting	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tenants being aware of their legal responsibilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Police reported crime in Brent e.g. burglary	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Number of tenants claiming benefits	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tenants leaving without paying rent/ignoring correct notice	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tenants leading up high levels of rent arrears	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Problems existing tenants	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lack of community engagement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If other, please specify:

Thinking about the private rented sector as a whole in Brent, to what extent do you agree or disagree with the following statements? (Please select one answer for each statement)

	LARGELY STRONGER	TENDS TO AGREE	NEITHER STRONGER OR WEAKER	TENDS TO DISAGREE	LARGELY WEAKER
Poorly maintained properties are contributing to the decline of some areas in Brent	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Poorly managed private let properties are contributing to the decline of some areas in Brent	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Landlords have a responsibility to manage their properties effectively	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Landlords should be 'fit and proper' persons, so that private let properties in the borough are well managed	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Thinking about how the private rented sector as a whole in Brent might be improved, to what extent do you agree or disagree with the following statements? (Please select one answer for each statement)

	LARGELY STRONGER	TENDS TO AGREE	NEITHER STRONGER OR WEAKER	TENDS TO DISAGREE	LARGELY WEAKER
Brent Council should intervene in areas suffering from high levels of anti-social behaviour	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Brent Council should have more control over the way private landlords manage their properties	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

SELECTIVE LICENSING CONDITIONS

The council has discretion to set precise conditions of the license. These can include conditions relating to use and occupation of the house, and measures to deal with anti-social behaviour of actual tenants or those visiting the property. There are also certain mandatory conditions which must be included in a license.

- For example, licensees are required to:**
- Present a gas safety certificate annually to the LHA, if gas is supplied to the house
 - Keep electrical appliances and furniture (supplied under the tenancy) in a safe condition
 - Keep smoke alarms in proper working order
 - Supply the occupier with a written statement of the terms of occupation
 - Demand references from persons wishing to occupy the house

Full selective licensing conditions can be found at www.brent.gov.uk/media/16403028/selective-licensing-conditions-booklet.pdf

To what extent do you agree or disagree that the proposed selective licensing conditions are reasonable?

	LARGELY STRONGER	TENDS TO AGREE	NEITHER STRONGER OR WEAKER	TENDS TO DISAGREE	LARGELY WEAKER
To what extent do you agree or disagree that the proposed selective licensing conditions are reasonable?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you 'tend to disagree' or 'disagree strongly' with the proposed selective licensing conditions, please tell us why:

TACKLING PROBLEMS

Selective Licensing is already in place in Willesden Green, Harlesden and Wembley Central and applications from landlords have seen a high number of properties licensed.

In your opinion, should Brent Council introduce Selective Licensing for Houses in Multiple Occupation (HMOs) in Brent? (Please select one answer)

Yes, borough-wide No

Yes, but only where I own/let property Don't know

Yes, but elsewhere in Brent

If yes, but only where I own/let property, please specify:

If yes, but elsewhere in Brent, please specify:

In your opinion, would introducing Selective Licensing achieve any of the following? (Please select all that apply)

Shift the reliance away from using resident complaints to identify problems

Promote a professional management ethos amongst private landlords

Provide tenants with consistent information on acceptable standards of accommodation

Allow the council to take action against landlords who provide poor standard of accommodation

Remove rogue landlords from the sector

Reduce level of anti-social behaviour in the borough

Provide safe homes for tenants to live in

Provide a strategic approach to managing their sector

Allow the council to take action against landlords whose tenants cause persistent anti-social behaviour

MORE ABOUT YOU

Please tell us a bit more about you to help us ensure that all our services are delivered fairly. We appreciate that some of these questions are personal. We ask for this information to help us ensure that we are meeting the needs of all our service users. If you do not wish to answer one of the questions, please select 'prefer not to say'. The information will be treated confidentially in line with the Data Protection Act 1998.

Please tell us your home or business postcode (if you're a managing agent):

How long have you owned property/properties in Brent? (Please select one answer)

Less than one year One to two years Two to five years

Five to ten years More than ten years Don't own a property in Brent

MORE ABOUT YOU

Are you? (Please select one answer)

Male

Female

Prefer not to say

How would you describe your ethnic background? (Please select one answer)

White: English/Welsh/Scottish/Northern Irish/British

White: Irish

White: Gypsy or Irish Traveller

Any other White background

White and Black Caribbean

White and Black African

White and Asian

African: Black/African/Caribbean/Black British

Caribbean: Black/African/Caribbean/Black British

Any other Black/African/Caribbean background

Chinese: Asian/Asian British

Bangladeshi: Asian/Asian British

Pakistani: Asian/Asian British

Indian: Asian/Asian British

Any other Asian background

Arab

Any other mixed/multiple ethnic background

Any other ethnic group

Prefer not to say

Do you have any long-standing illness, disability or infirmity? (Long-standing means anything that has troubled you over a period of time or that is likely to affect you over a period of time)

Yes No

What is your age group? (Please select one answer)

Under 18 18 - 24

25 - 34 35 - 44

45 - 54 55 - 60

61+ Prefer not to say

What is your sexual orientation? (Please select one answer)

Heterosexual/straight Other

Lesbian Gay man

Bisexual Prefer not to say

What is your religion or belief? (Please select one answer)

Buddhist Christian

Hindu Jewish

Muslim Sikh

None Prefer not to say

Other

If other, please specify:

How did you hear about this consultation? (Please select all that apply)

Leaflet Poster

Email Brent website

Brent Connects Word of mouth

Brent Citizens' Panel Local newspaper

Other

If other, please specify:



HAVE YOUR SAY

Should we extend private rented property licensing?

Since we introduced our selective licensing scheme for all private rental properties in Harlesden, Willesden Green and Wembley Central at the end of 2014, we've made great strides in tackling rogue landlords.

Licensing is proven to help tackle antisocial behaviour and overcrowding, and this year alone we've raided over 100 unlicensed or license-breaking properties and successfully prosecuted 43 landlords, resulting in fines over £280,000 and, in one case, a four month jail sentence. We've done this because we think that it's not fair that landlords should get away with cramming tenants into unsafe, unfit housing.

We're now running a consultation to find out what the people of Brent and other stakeholders think about extending the scheme so it applies to most or even all the borough.

For more information about the consultation and to complete the online survey, go to www.brent.gov.uk/prslicensing2016. You can also email: prslicensing@brent.gov.uk or post your comments to: Tony Kimmott, Private Housing Services, Brent Civic Centre, Engineers Way, Wembley, HA9 0PJ.



Appendix B: Questionnaire – Other Stakeholders

PRIVATE RENTED SECTOR LICENSING 2016 QUESTIONNAIRE: OTHER STAKEHOLDERS

ABOUT YOU

Which of the following best describes you?
(Please select one answer)

I am based in...
(Please select one answer)

- | | | | |
|---|--------------------------|---|--------------------------|
| Neighbouring Local Authority..... | <input type="checkbox"/> | London Borough of Barnet..... | <input type="checkbox"/> |
| Resident in a neighbouring borough..... | <input type="checkbox"/> | London Borough of Camden..... | <input type="checkbox"/> |
| Business owner in a neighbouring borough..... | <input type="checkbox"/> | London Borough of Ealing..... | <input type="checkbox"/> |
| Landlord in neighbouring borough..... | <input type="checkbox"/> | London Borough of Harrow..... | <input type="checkbox"/> |
| Managing or Letting agent resident in neighbouring borough..... | <input type="checkbox"/> | London Borough of Hammersmith and Fulham..... | <input type="checkbox"/> |
| Other interested party..... | <input type="checkbox"/> | Royal Borough of Kensington and Chelsea..... | <input type="checkbox"/> |
| | | London Borough of Westminster..... | <input type="checkbox"/> |
| | | Other..... | <input type="checkbox"/> |

If other interested party, please give details

If other, please specify:



LOCAL SOLUTIONS

Selective Licensing is already in place in Willesden Green, Harlesden and Wembley Central and applications from landlords have seen a high number of properties licensed

Do you agree or disagree with the council's proposal to extend Selective Licensing in Brent? (Please select one answer)

- Yes, borough-wide..... No.....
- Yes, but only where I am based..... Don't know.....
- Yes, but in other areas around Brent.....

If yes, but only where I am based, please state location:

If yes, but in other areas around Brent, please specify:

Thinking about how the private rented sector as a whole in Brent might be improved, to what extent do you agree or disagree with the following statements?

(Please select one answer for each statement)

- | | 1 (AGREE STRONGLY) | 2 (TEND TO AGREE) | 3 (NEUTRAL) | 4 (TEND TO DISAGREE) | 5 (DISAGREE STRONGLY) |
|--|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| Brent Council should intervene in areas suffering from high levels of anti-social behaviour..... | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Brent Council should have more control over the way private landlords manage their properties..... | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Licensing of the privately rented sector will help to reduce anti-social behaviour in the borough..... | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Licensing of the privately rented sector will ensure that properties in poor condition are properly managed to prevent further deterioration..... | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Licensing of the privately rented sector will ensure that people who occupy properties do not live in poorly managed housing or unacceptable conditions..... | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Licensing of the privately rented sector will help to preserve and improve the social and economic status of the local area..... | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Licensing of the privately rented sector will reduce the impact of criminal activity on residents and businesses in Brent..... | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

SELECTIVE LICENSING CONDITIONS

The council has discretion to set precise conditions of the license. These can include conditions relating to use and occupation of the house, and measures to deal with anti-social behaviour of actual tenants or those visiting the property.

There are also certain mandatory conditions which must be included in a license. For example, licensees are required to:

- Present a gas safety certificate annually to the LHA, if gas is supplied to the house
- Keep electrical appliances and furniture (supplied under the tenancy) in a safe condition
- Keep smoke alarms in proper working order
- Supply the occupier with a written statement of the terms of occupation
- Demand references from persons wishing to occupy the house

Full selective licensing conditions can be found at www.brent.gov.uk/media/16443028/selective-licensing-conditions-booklet.pdf

To what extent do you agree or disagree that the proposed selective licensing conditions are reasonable?

- | | | | | |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 1 (AGREE STRONGLY) | 2 (TEND TO AGREE) | 3 (NEUTRAL) | 4 (TEND TO DISAGREE) | 5 (DISAGREE STRONGLY) |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

If you 'tend to disagree' or 'disagree strongly' with the proposed selective licensing conditions, please tell us why:

If you have any further comments regarding this proposal, please tell us below:

PRIVATE RENTED SECTOR LICENSING 2016 QUESTIONNAIRE - OTHER STAKEHOLDERS

MORE ABOUT YOU

Please tell us a bit more about you to help us ensure that all our services are delivered fairly. We appreciate that some of these questions are personal. We ask for this information to help us ensure that we are meeting the needs of all our service users. If you do not wish to answer one of the questions, please select 'prefer not to say'. The information will be treated confidentially in line with the Data Protection Act 1998.

Please tell us your postcode:

<p>How long have you owned property/properties in Brent? (Please select one answer)</p> <p>Less than one year <input type="checkbox"/></p> <p>One to two years <input type="checkbox"/></p> <p>Two to five years <input type="checkbox"/></p> <p>Five to ten years <input type="checkbox"/></p> <p>More than ten years <input type="checkbox"/></p> <p>Don't own a property in Brent <input type="checkbox"/></p> <p>Are you? (Please select one answer)</p> <p>Male <input type="checkbox"/></p> <p>Female <input type="checkbox"/></p> <p>Prefer not to say <input type="checkbox"/></p> <p>What is your age group? (Please select one answer)</p> <p>Under 18 <input type="checkbox"/></p> <p>18 - 24 <input type="checkbox"/></p> <p>25 - 34 <input type="checkbox"/></p> <p>35 - 44 <input type="checkbox"/></p> <p>45 - 54 <input type="checkbox"/></p> <p>55 - 60 <input type="checkbox"/></p> <p>61+ <input type="checkbox"/></p> <p>Prefer not to say <input type="checkbox"/></p>	<p>How would you describe your ethnic background? (Please select one answer)</p> <p>White: English/Welsh/Scottish/Northern Irish/British <input type="checkbox"/></p> <p>White: Irish <input type="checkbox"/></p> <p>White: Gypsy or Irish Traveller <input type="checkbox"/></p> <p>Any other White background <input type="checkbox"/></p> <p>White and Black Caribbean <input type="checkbox"/></p> <p>White and Black African <input type="checkbox"/></p> <p>White and Asian <input type="checkbox"/></p> <p>African: Black/African/Caribbean/Black British <input type="checkbox"/></p> <p>Caribbean: Black/African/Caribbean/Black British <input type="checkbox"/></p> <p>Any other Black/African/Caribbean background <input type="checkbox"/></p> <p>Chinese/Asian/Asian British <input type="checkbox"/></p> <p>Bangladeshi/Asian/Asian British <input type="checkbox"/></p> <p>Pakistani/Asian/Asian British <input type="checkbox"/></p> <p>Indian/Asian/Asian British <input type="checkbox"/></p> <p>Any other Asian background <input type="checkbox"/></p> <p>Arab <input type="checkbox"/></p> <p>Any other mixed/multiple ethnic background <input type="checkbox"/></p> <p>Any other ethnic group <input type="checkbox"/></p> <p>Prefer not to say <input type="checkbox"/></p>
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MORE ABOUT YOU

What is your religion or belief?
(Please select one answer)

Buddhist

Christian

Hindu

Jewish

Muslim

Sikh

None

Prefer not to say

Other

If other, please specify:

How did you hear about this consultation?
(Please select all that apply)

Leaflet

Poster

Email

Brent website

Brent Connects

Brent Citizens' Panel

Word of mouth

Local newspaper

Other

If other, please specify:

Do you have any long-standing illness, disability or infirmity?
(Long-standing means anything that has troubled you over a period of time or that is likely to affect you over a period of time)

Yes No

What is your sexual orientation?
(Please select one answer)

Heterosexual/straight

Lesbian

Gay man

Bisexual

Prefer not to say

Other

If other, please specify:

HAVE YOUR SAY

Should we extend private rented property licensing?

Since we introduced our selective licensing scheme for all private rental properties in Harlesden, Willesden Green and Wembley Central at the end of 2014, we've made great strides in tackling rogue landlords.

Licensing is proven to help tackle antisocial behaviour and overcrowding, and this year alone we've raised over 100 unlicensed or licence-breaking properties and successfully prosecuted 43 landlords, resulting in fines over £300,000 and, in one case, a four month jail sentence. We've done this because we think that it's not fair that landlords should get away with cramming tenants into unsafe, unfit housing.

We're now running a consultation to find out what the people of Brent and other stakeholders think about extending the scheme so it applies to most or even all the borough.

For more information about the consultation and to complete the online survey go to www.brent.gov.uk/private2016

You can also email private2016@brent.gov.uk or post your comments to: Tony Summitt, Private Housing Services, Brent Civic Centre, Engineers Way, Wembley HA9 6TJ

APPENDIX C: PRS Licensing 2016 Questionnaire Consultation Charts

APPENDIX C1: PRS Licensing 2016 Questionnaire Consultation Responses - Residents, Tenants and Businesses in Brent

Respondents were asked in what capacity they were completing the questionnaire.

Figure 1 Response levels by respondent type

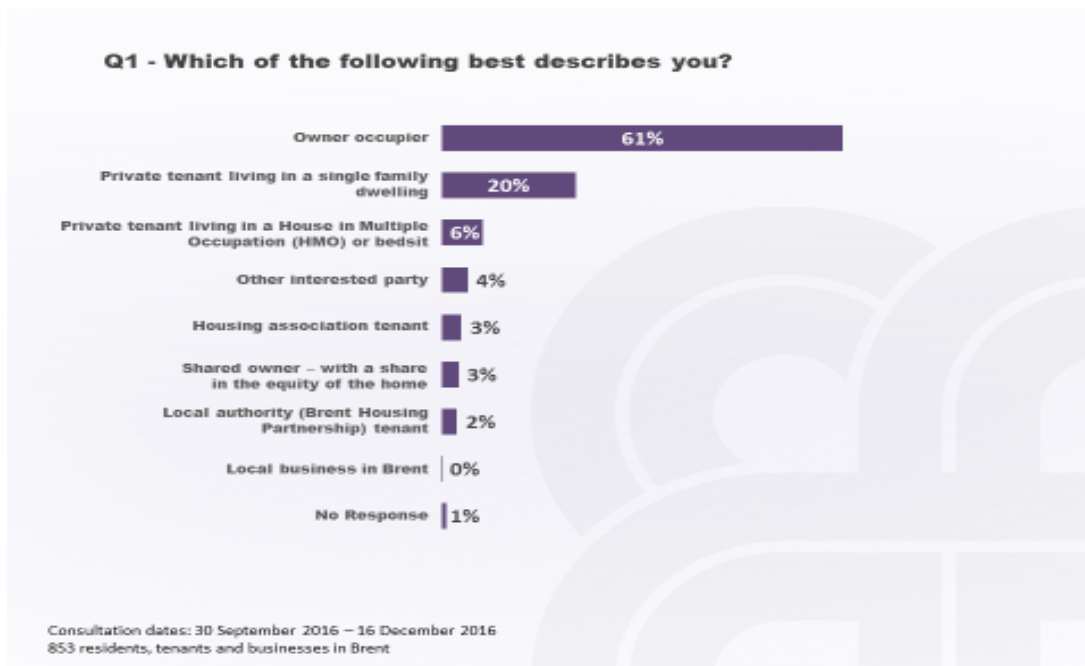


Figure 2 Problems in the local area, rating of those problems by respondents

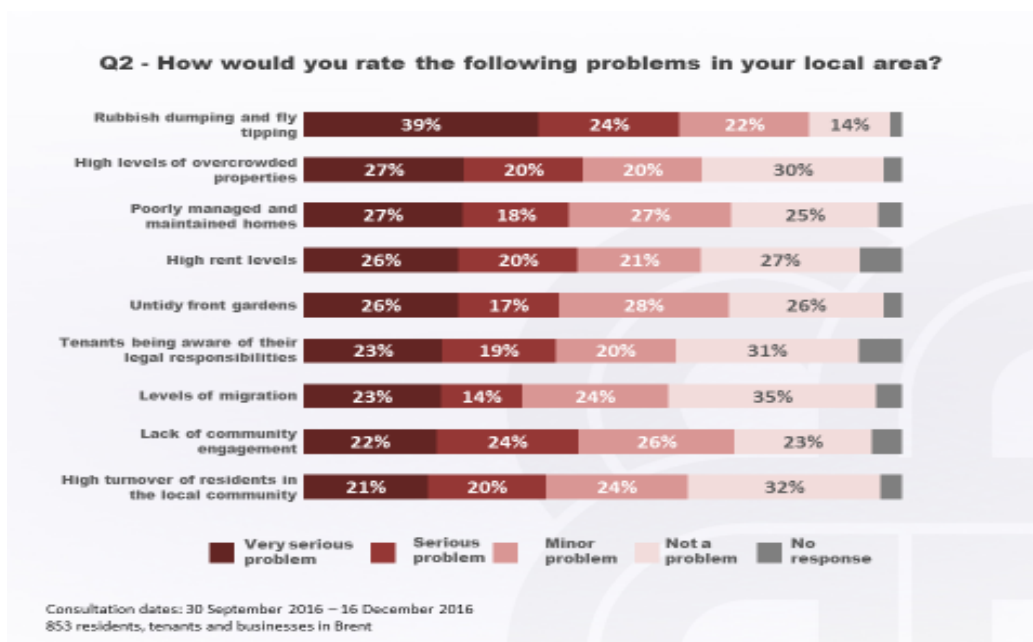


Figure 2 Problems in the local area, rating of those problems by respondents

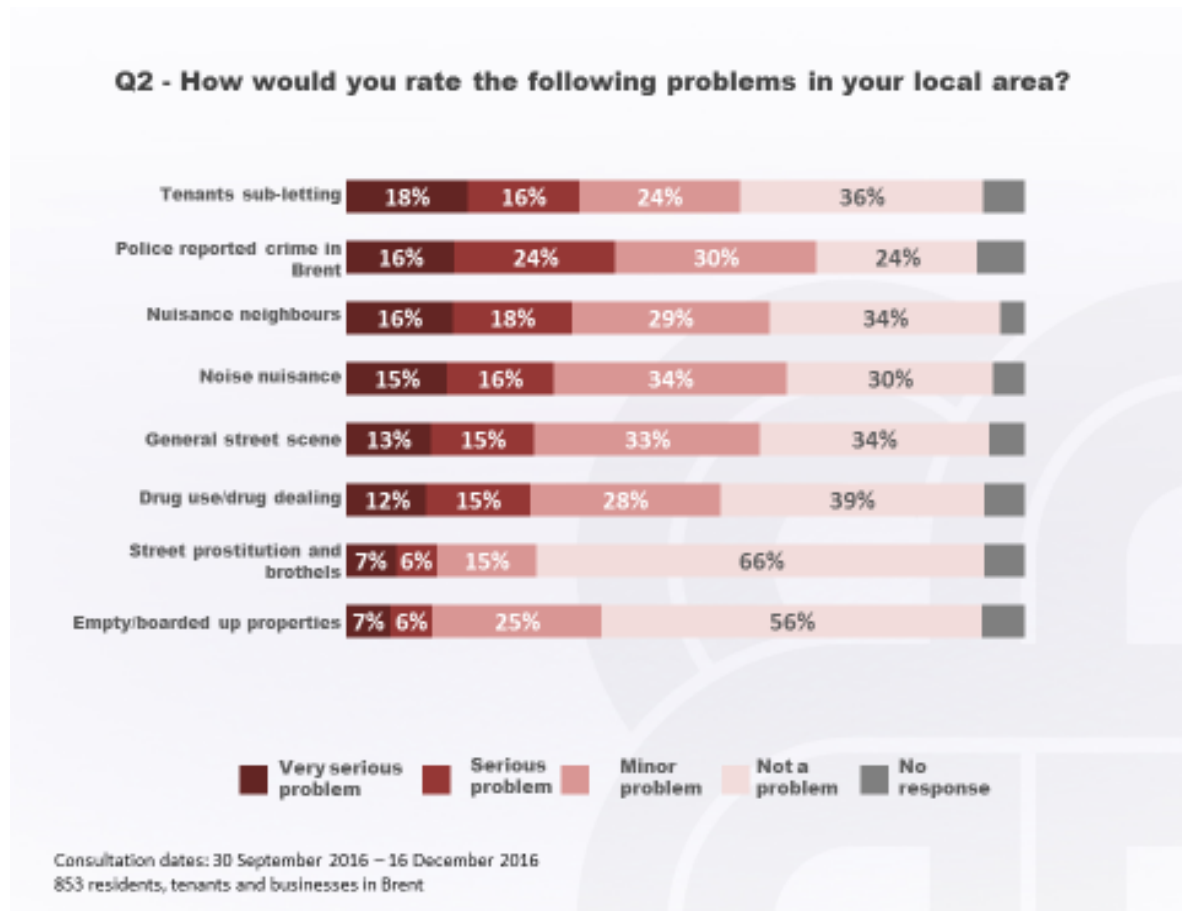


Figure 3

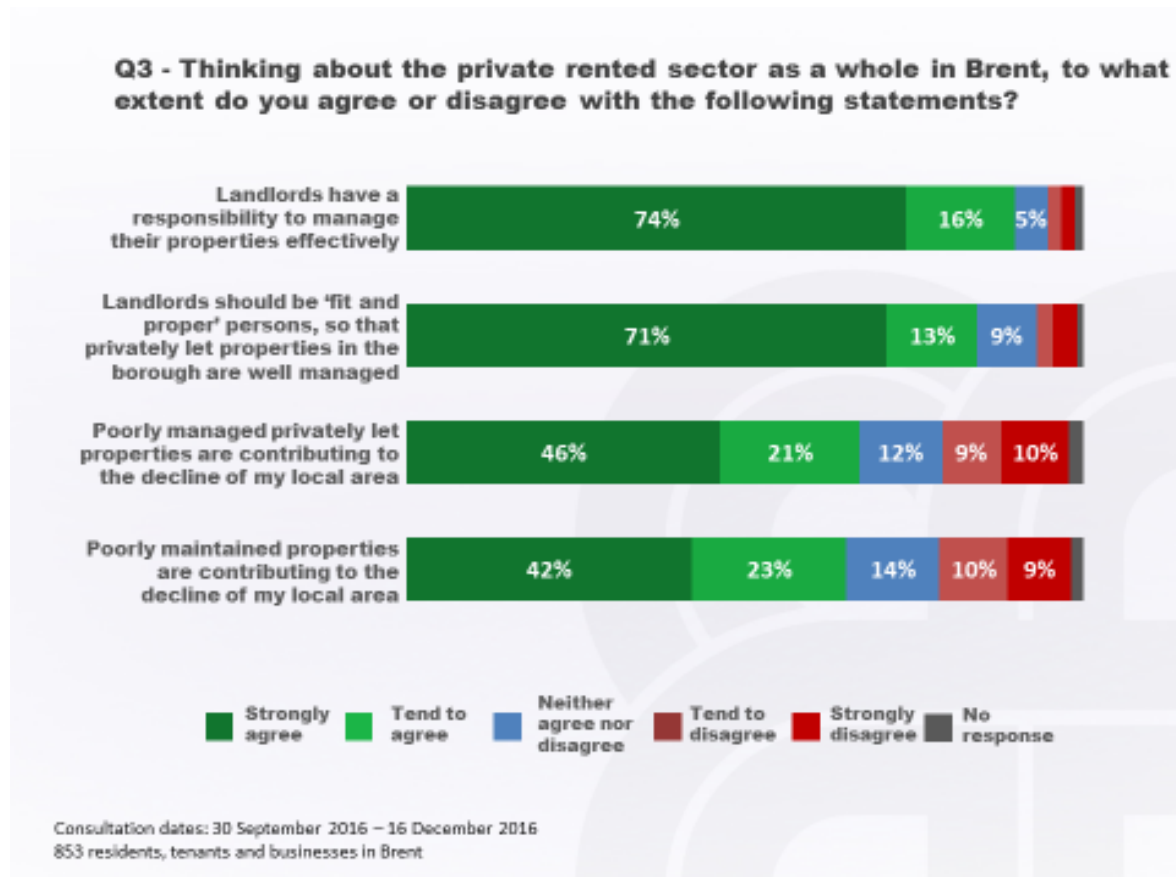


Figure 4

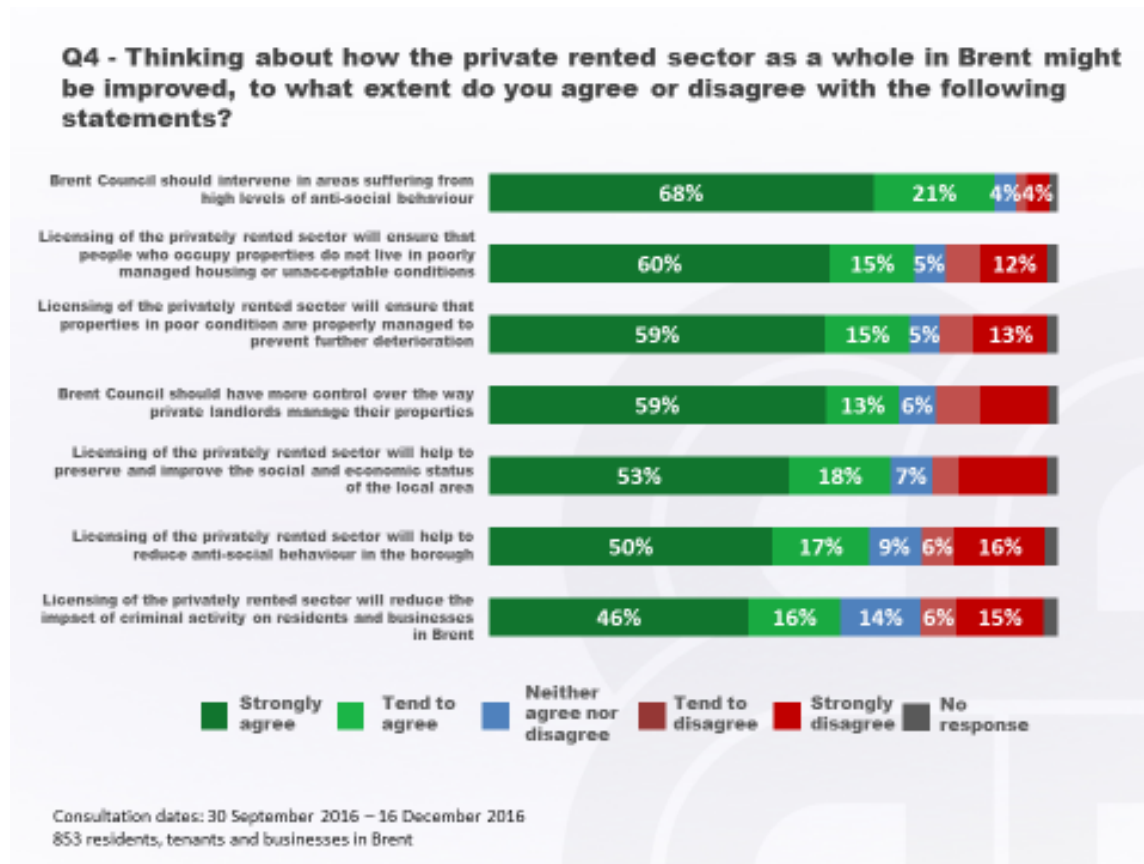


Figure 5

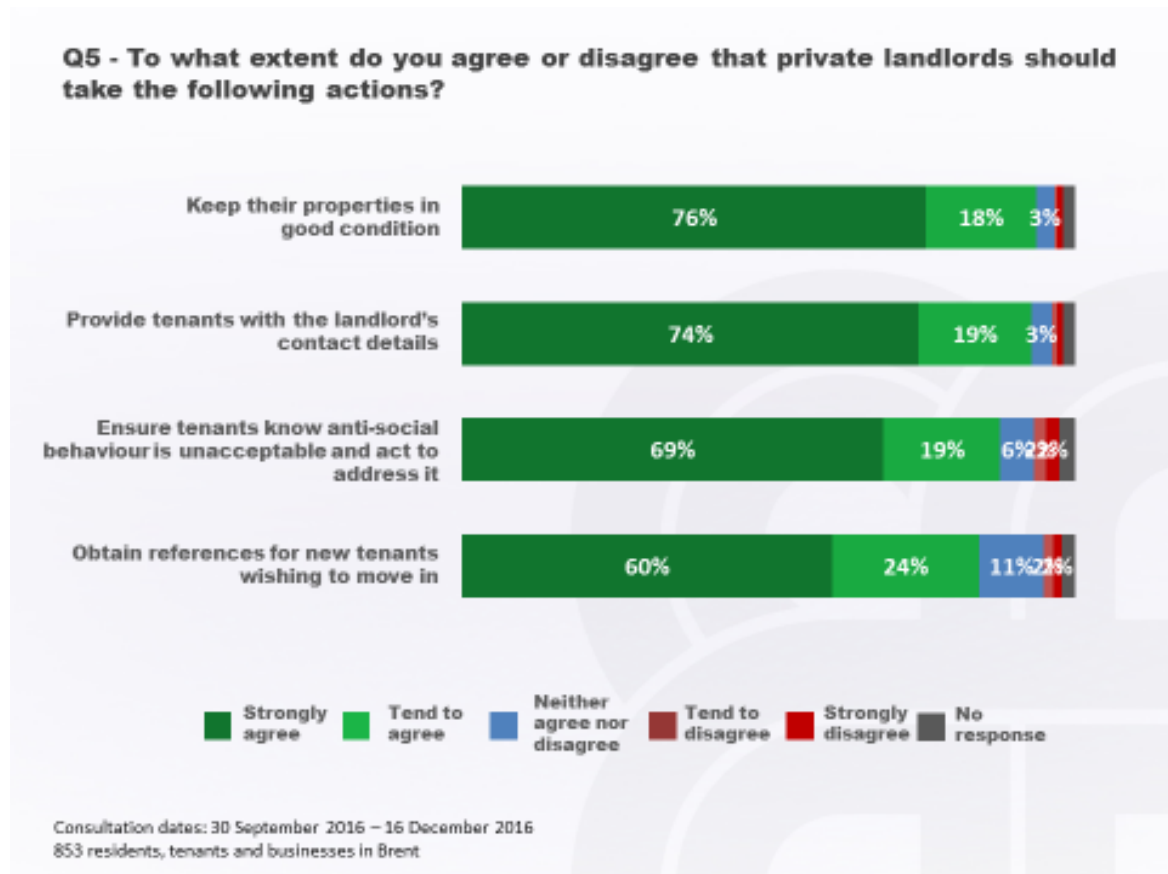


Figure 6

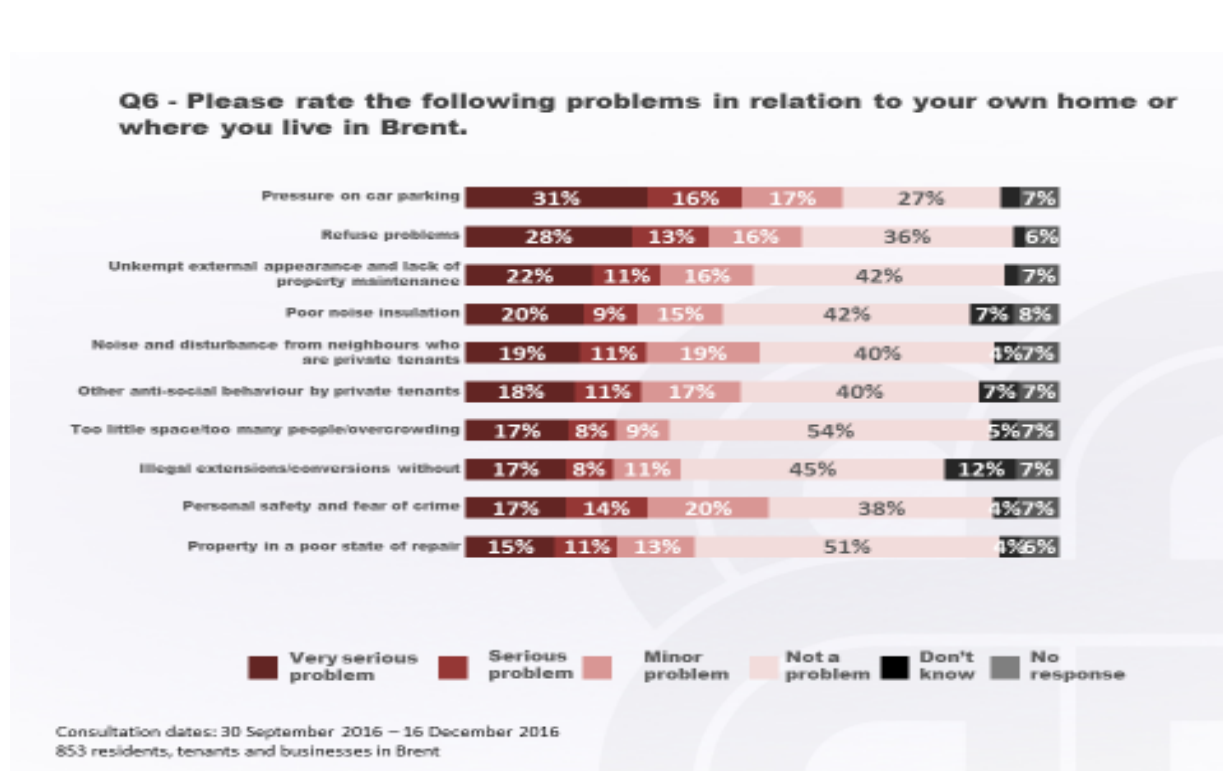


Figure 6

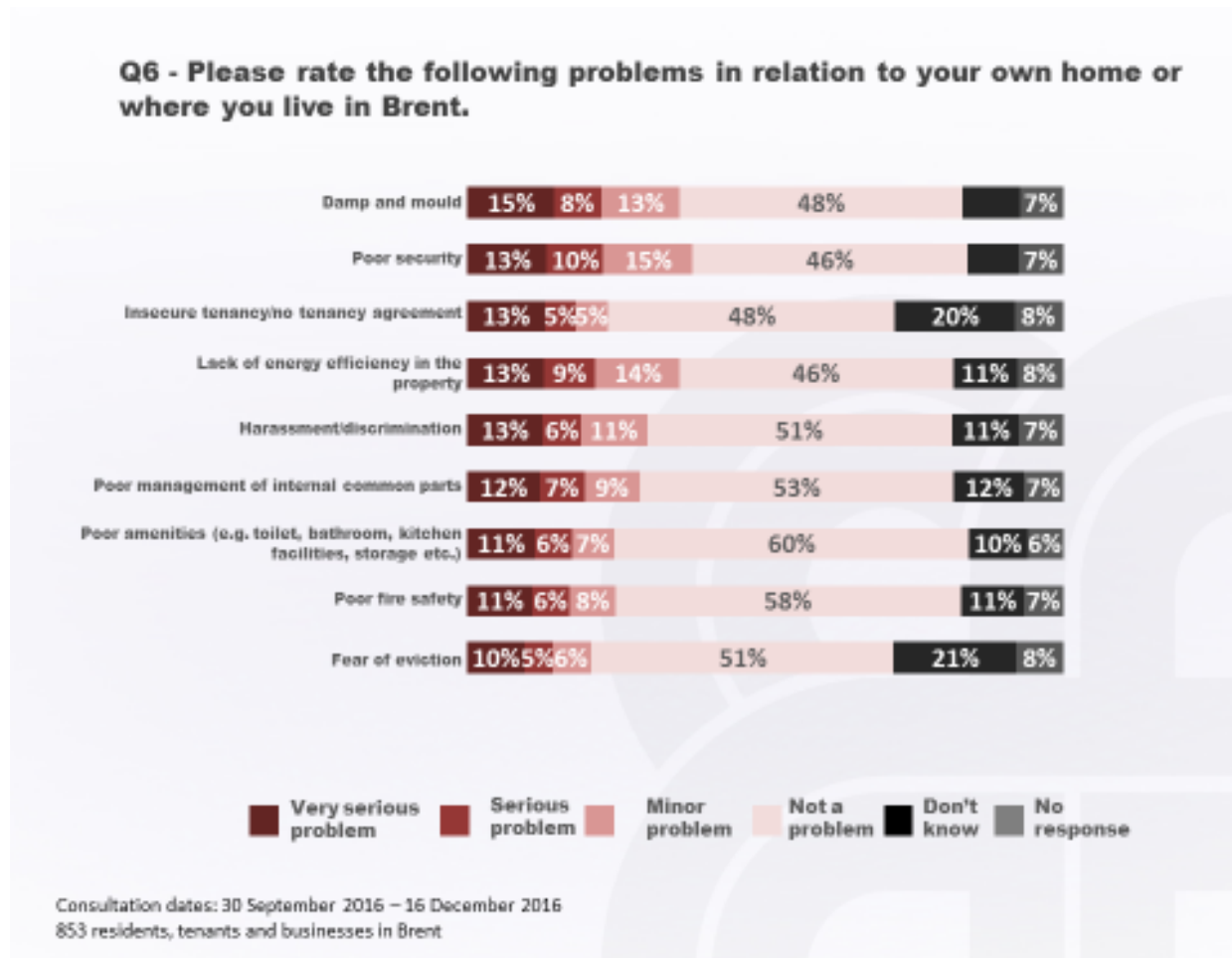


Figure 7

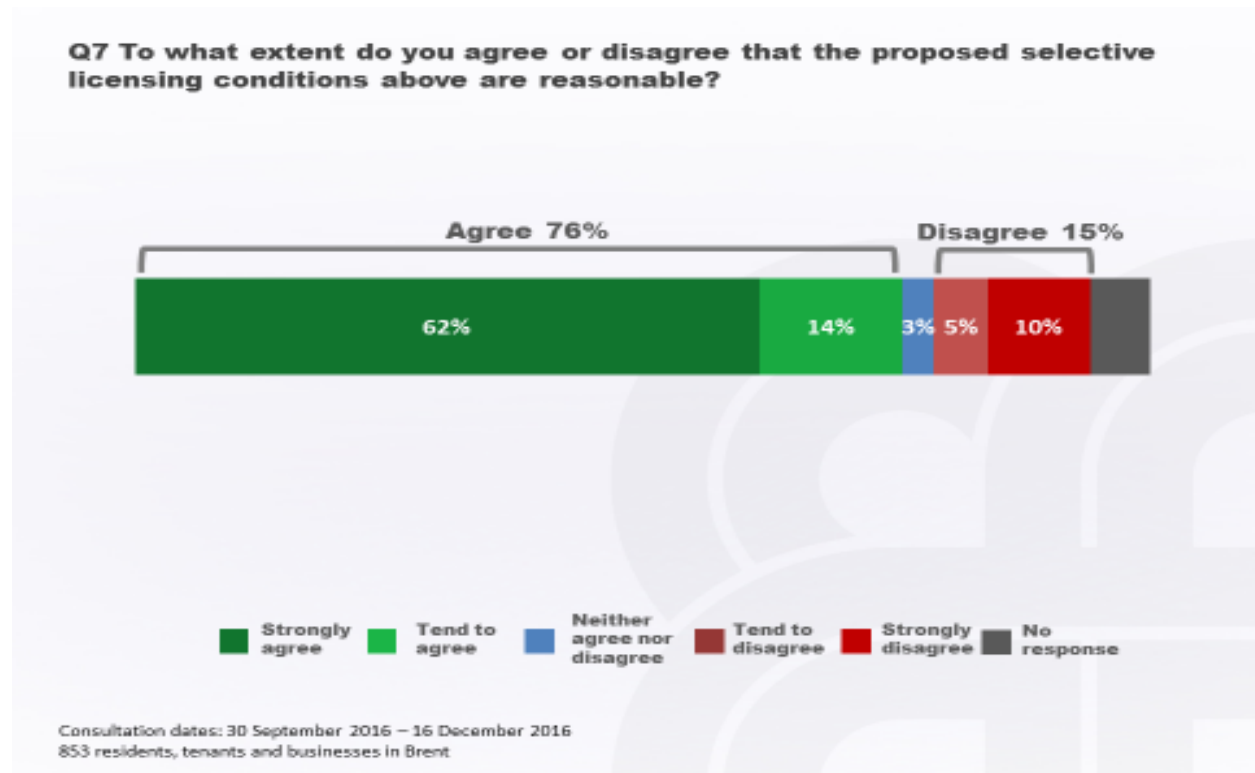


Figure 8

Q8 - In your opinion, should the council extend selective licensing for single family dwellings (for example self-contained flats or houses) in Brent?



Consultation dates: 30 September 2016 – 16 December 2016
853 residents, tenants and businesses in Brent

Figure 9

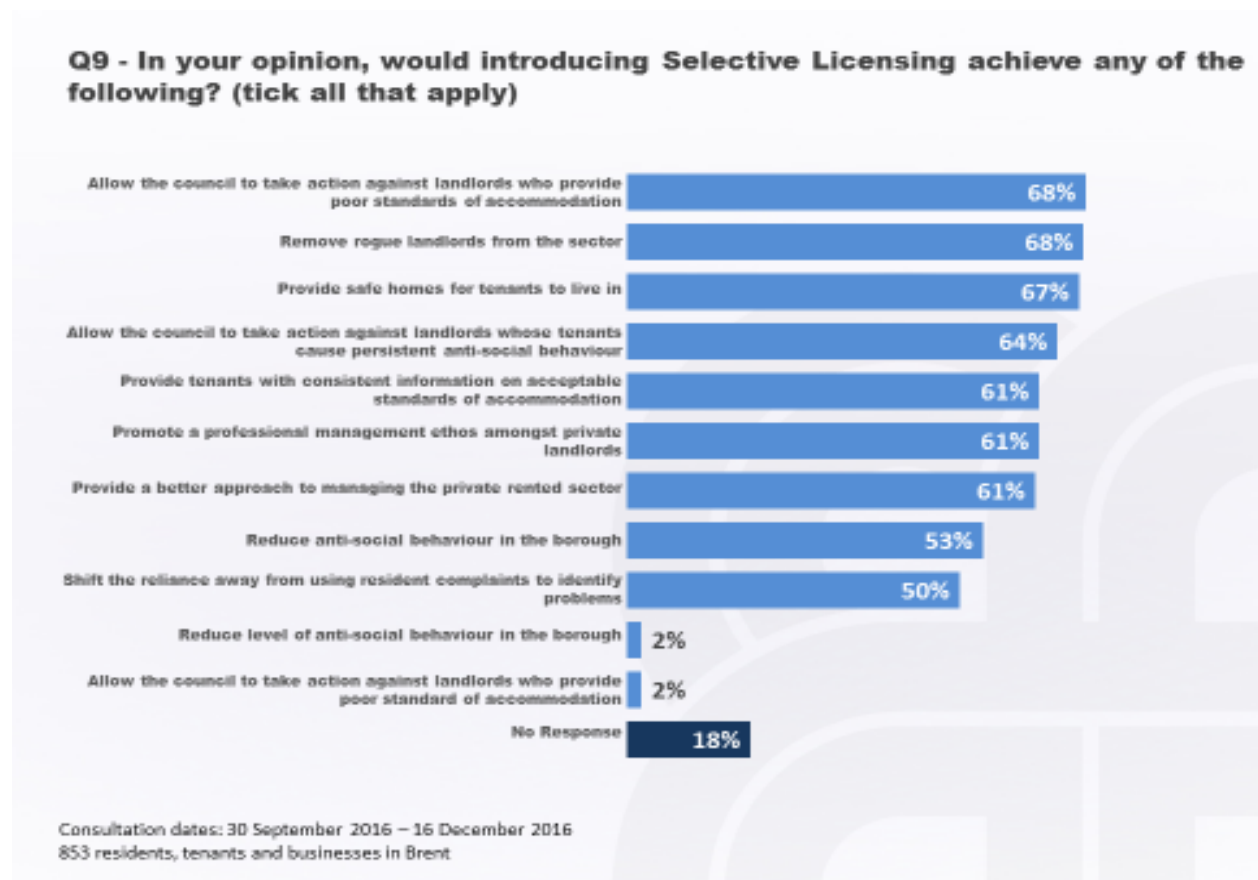


Figure 10

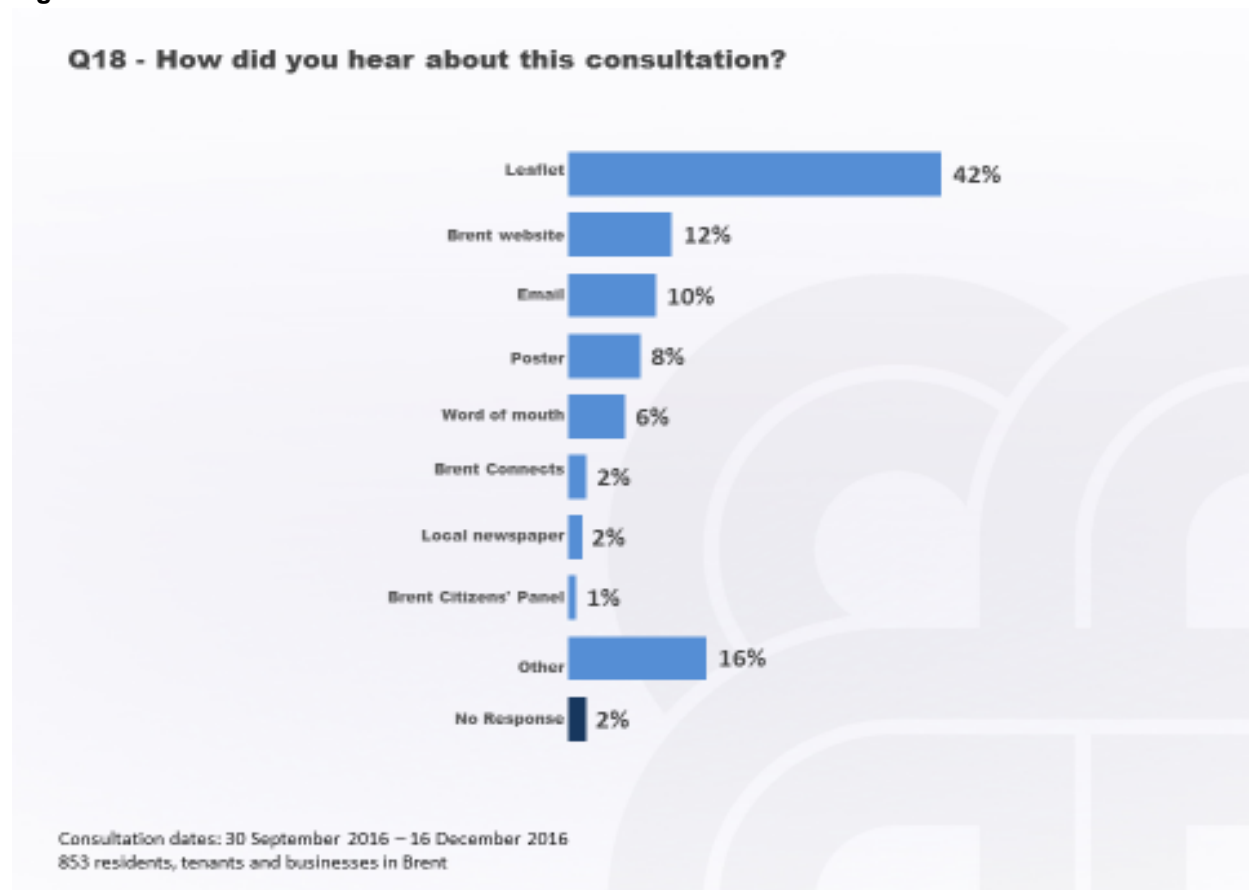
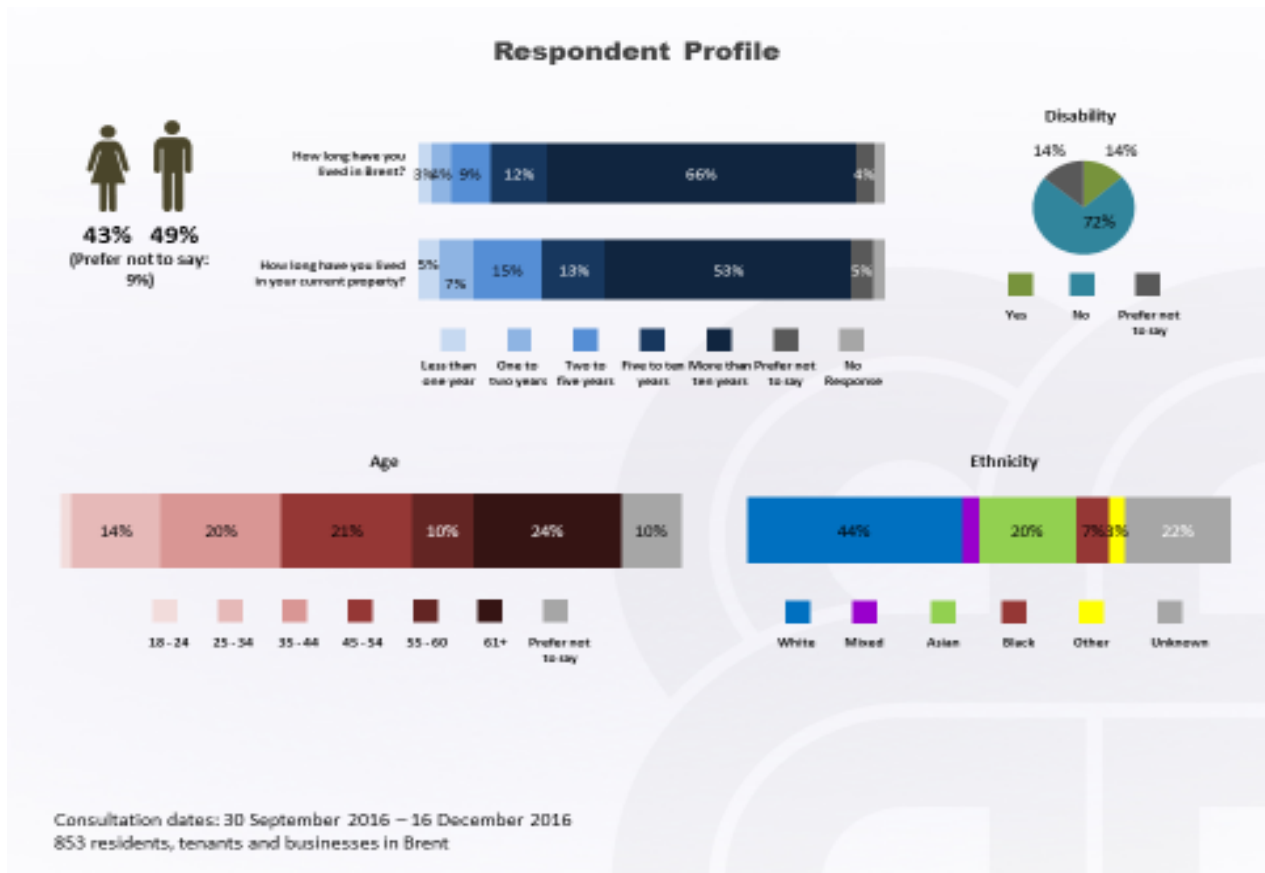


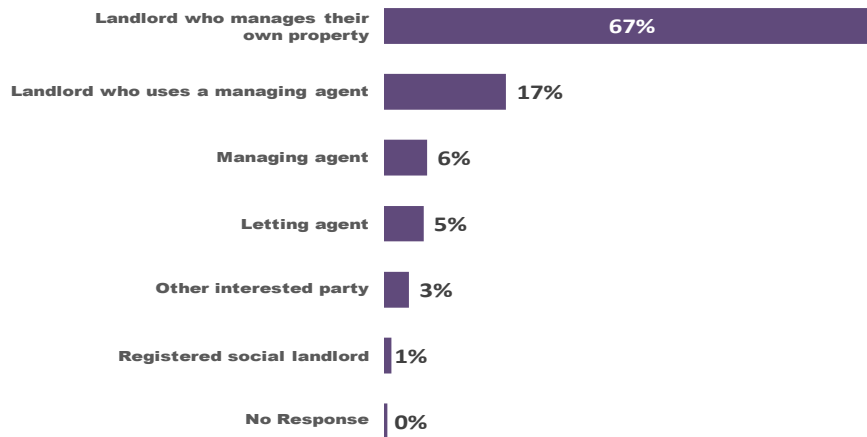
Figure 11 Respondent Profile



PRS Licensing 2016 Questionnaire Consultation Responses – Landlords and managing agents

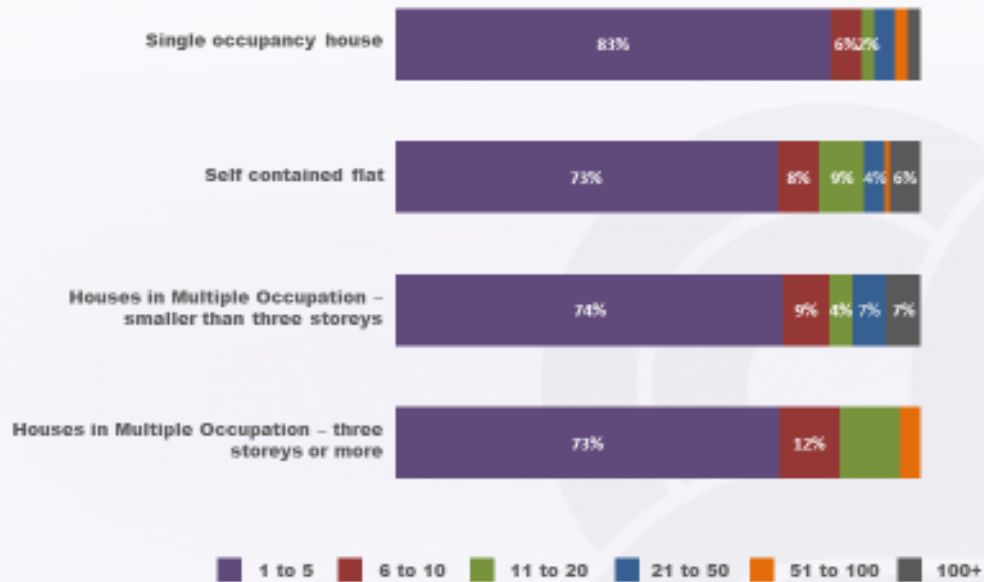
Figure 12 Landlords respondent type

Q1 - Which of the following best describes you?



Consultation dates: 30 September 2016 – 16 December 2016
205 landlords and managing agents

Q2: Type/number of properties owned/managed in Brent



Consultation dates: 30 September 2016 – 16 December 2016
205 landlords and managing agents

Figure 14

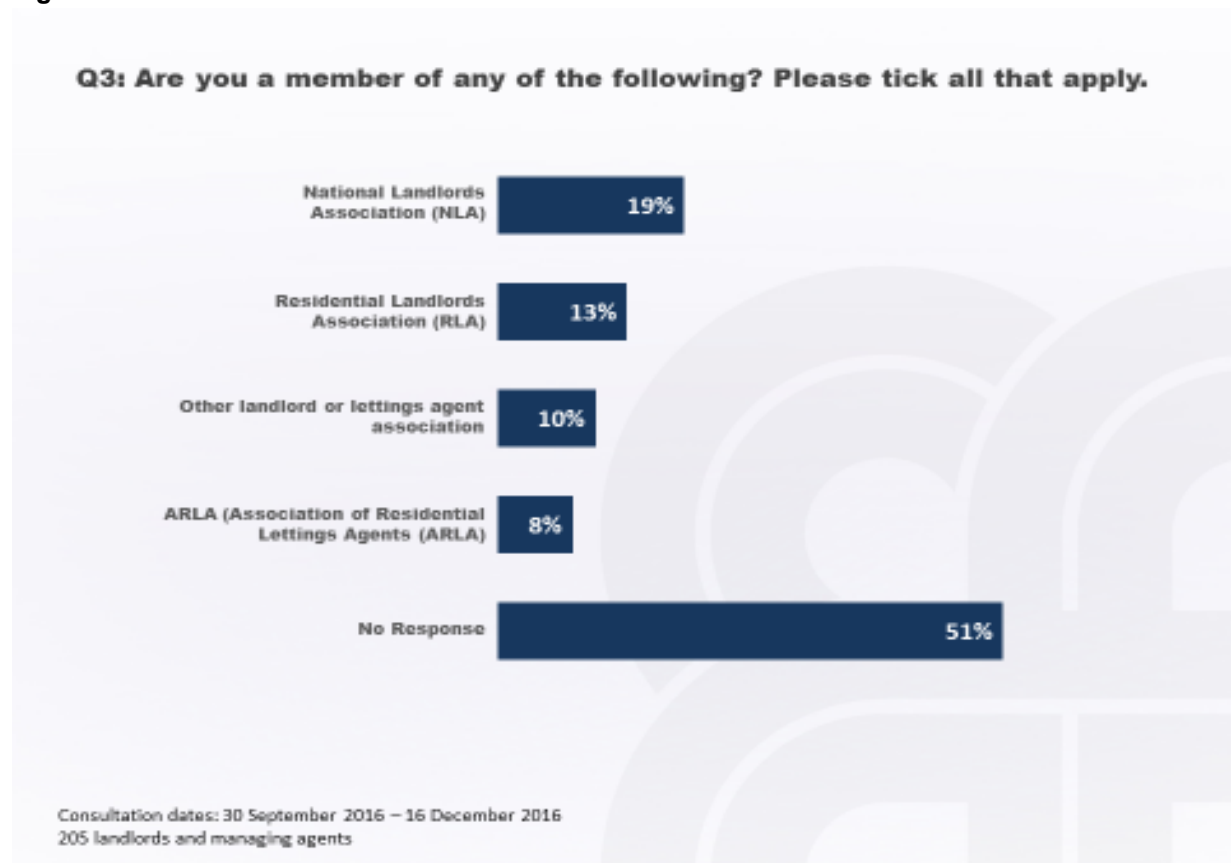


Figure 15

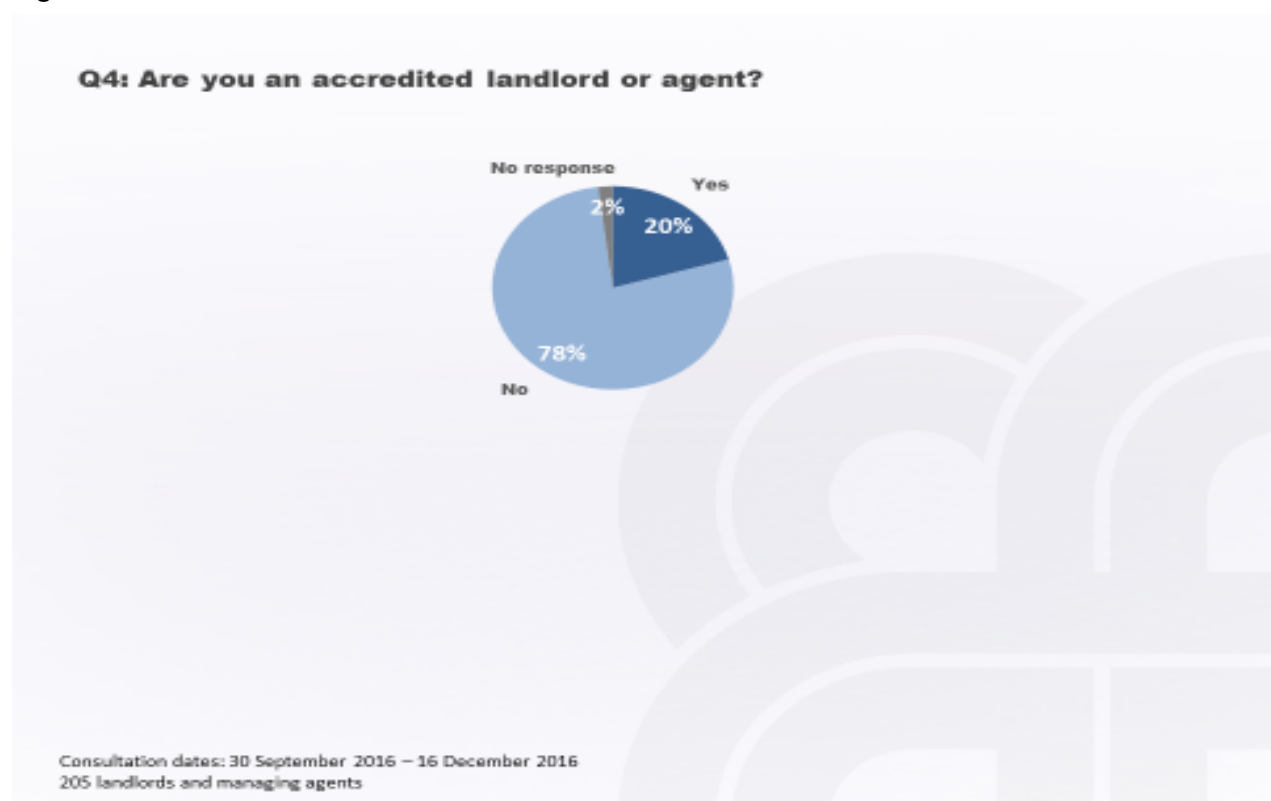


Figure 16

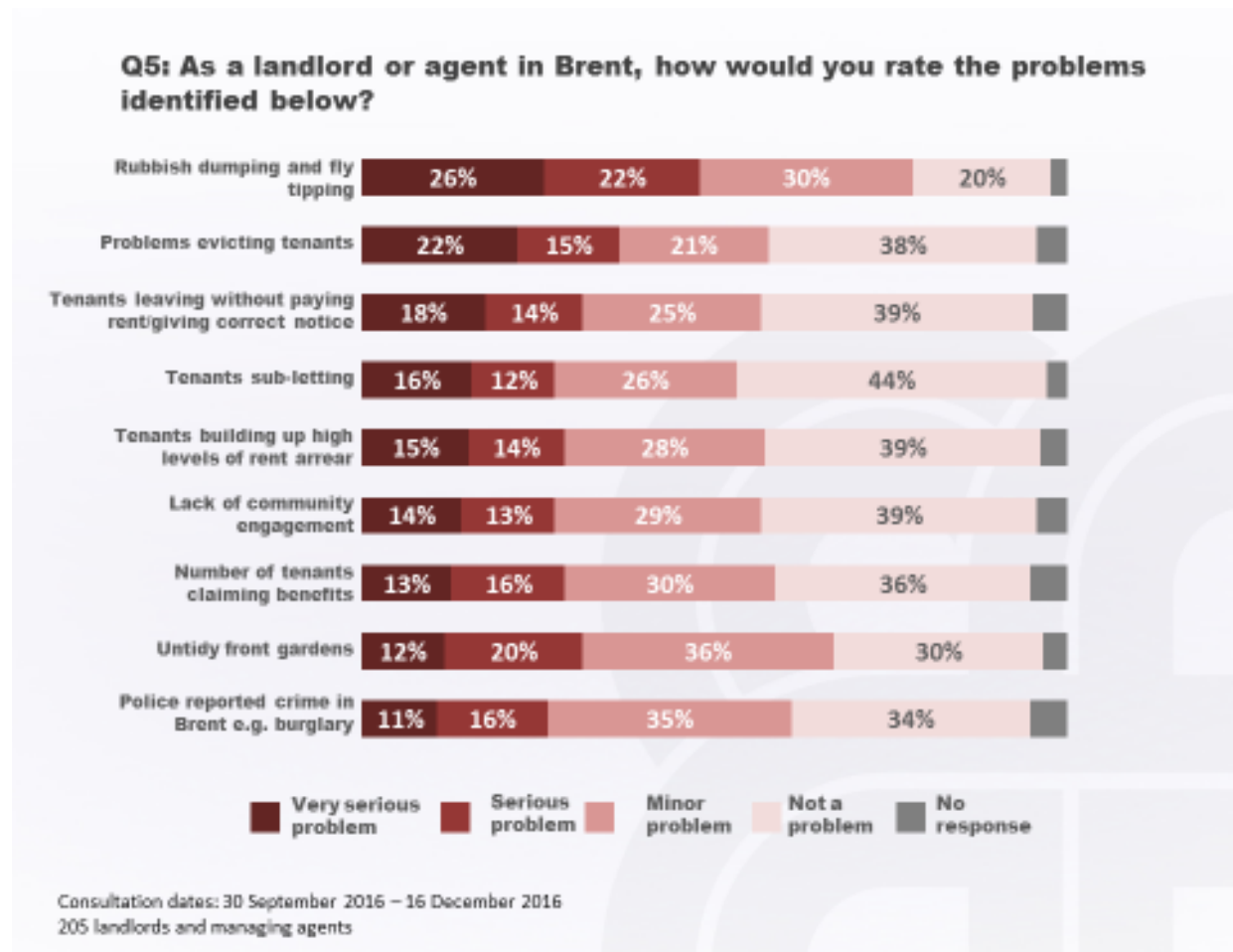


Figure 17

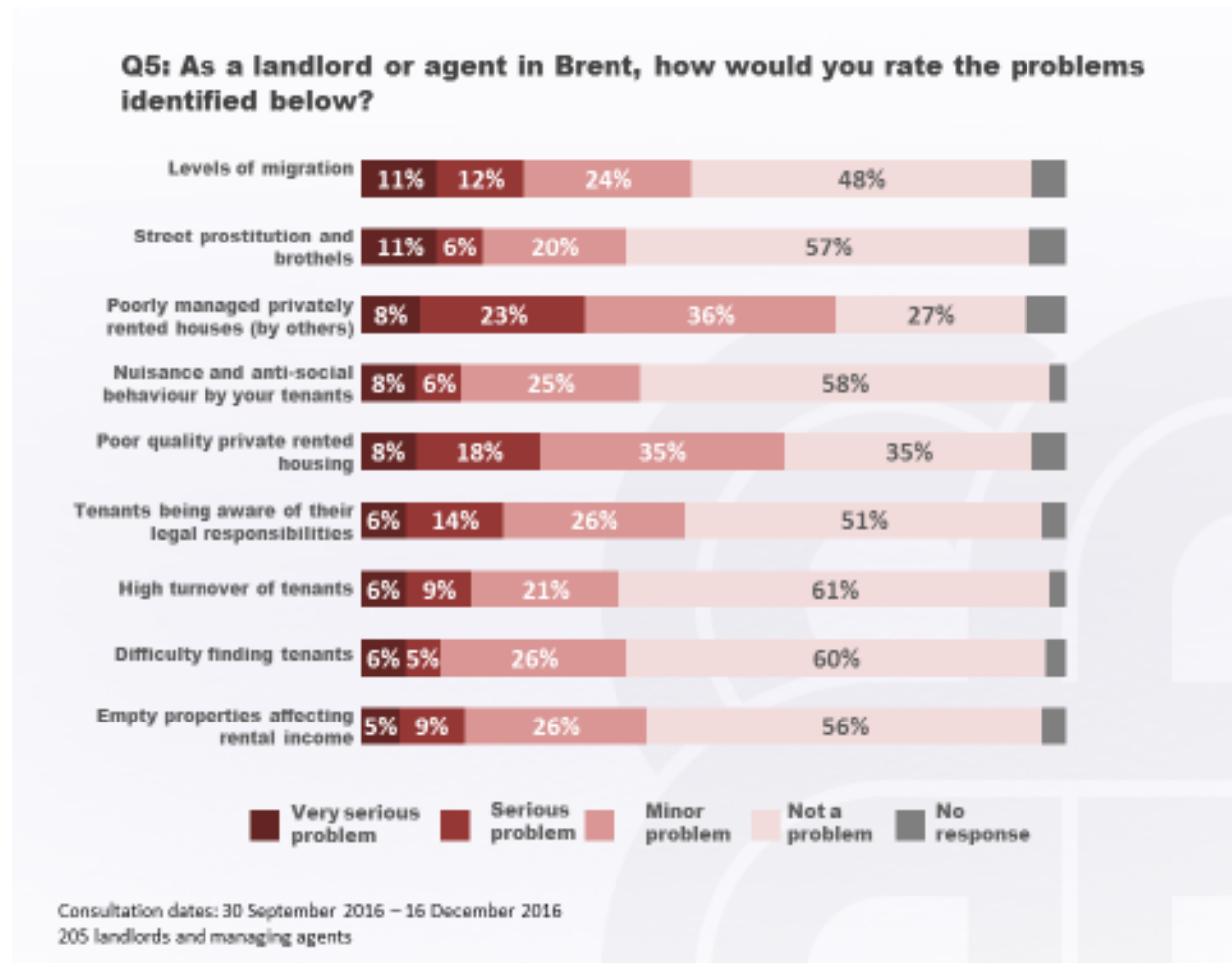


Figure 18

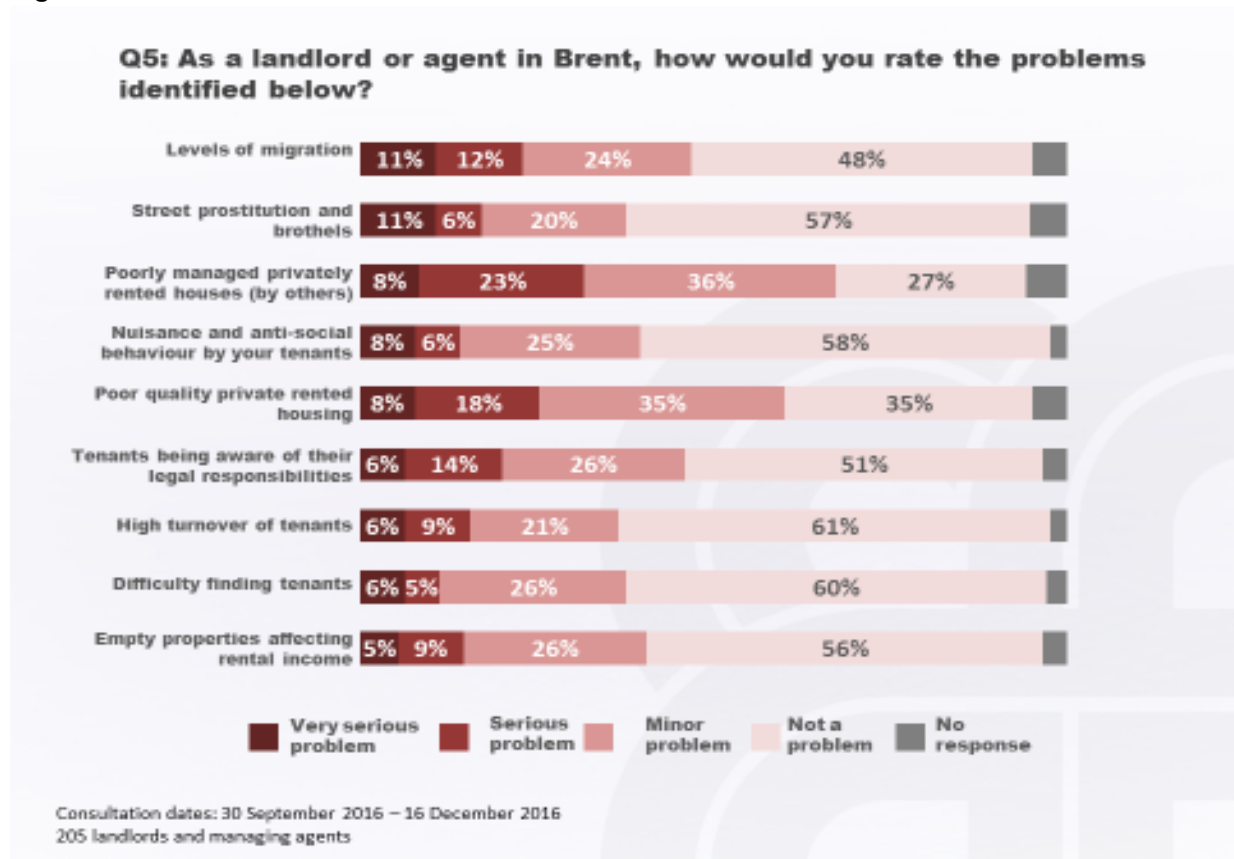


Figure 19

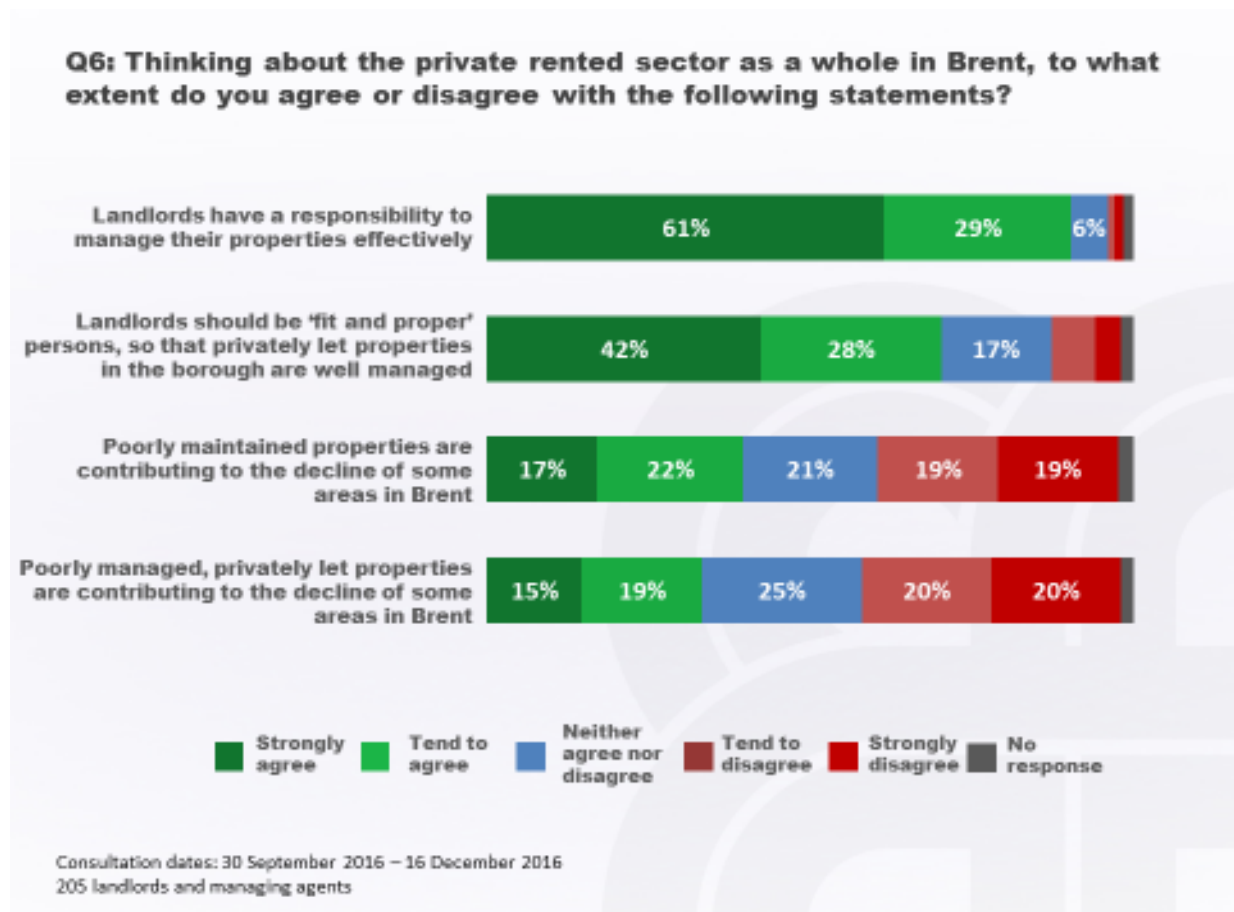


Figure 20

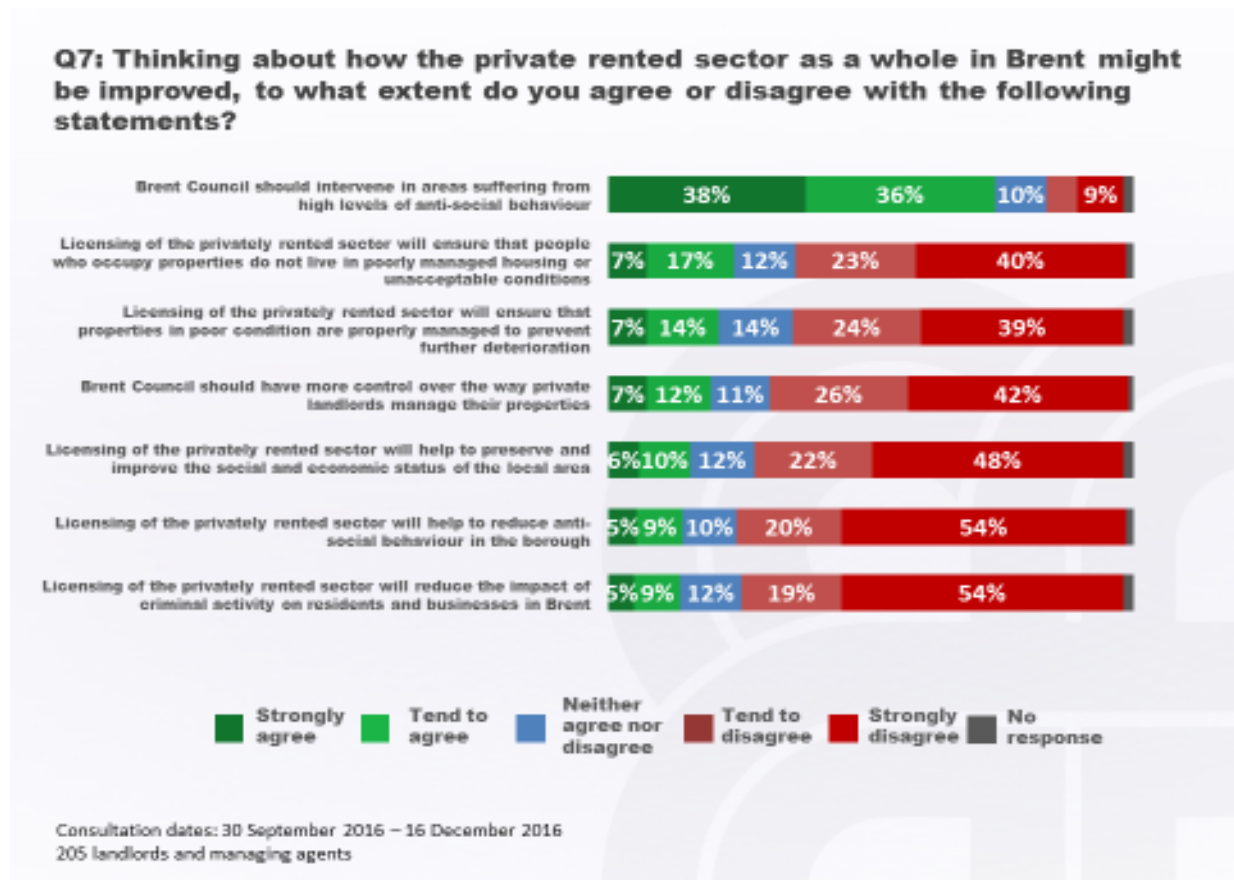


Figure 21

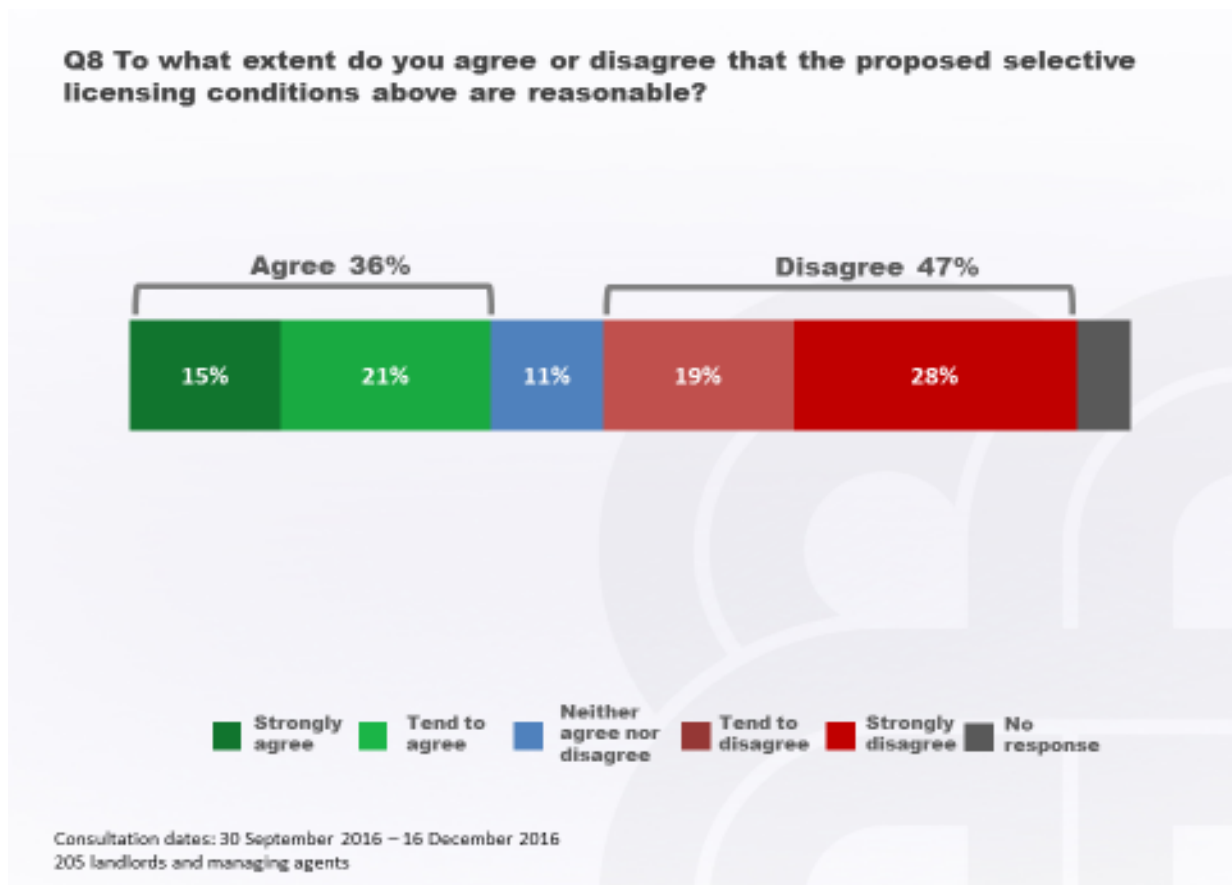


Figure 22

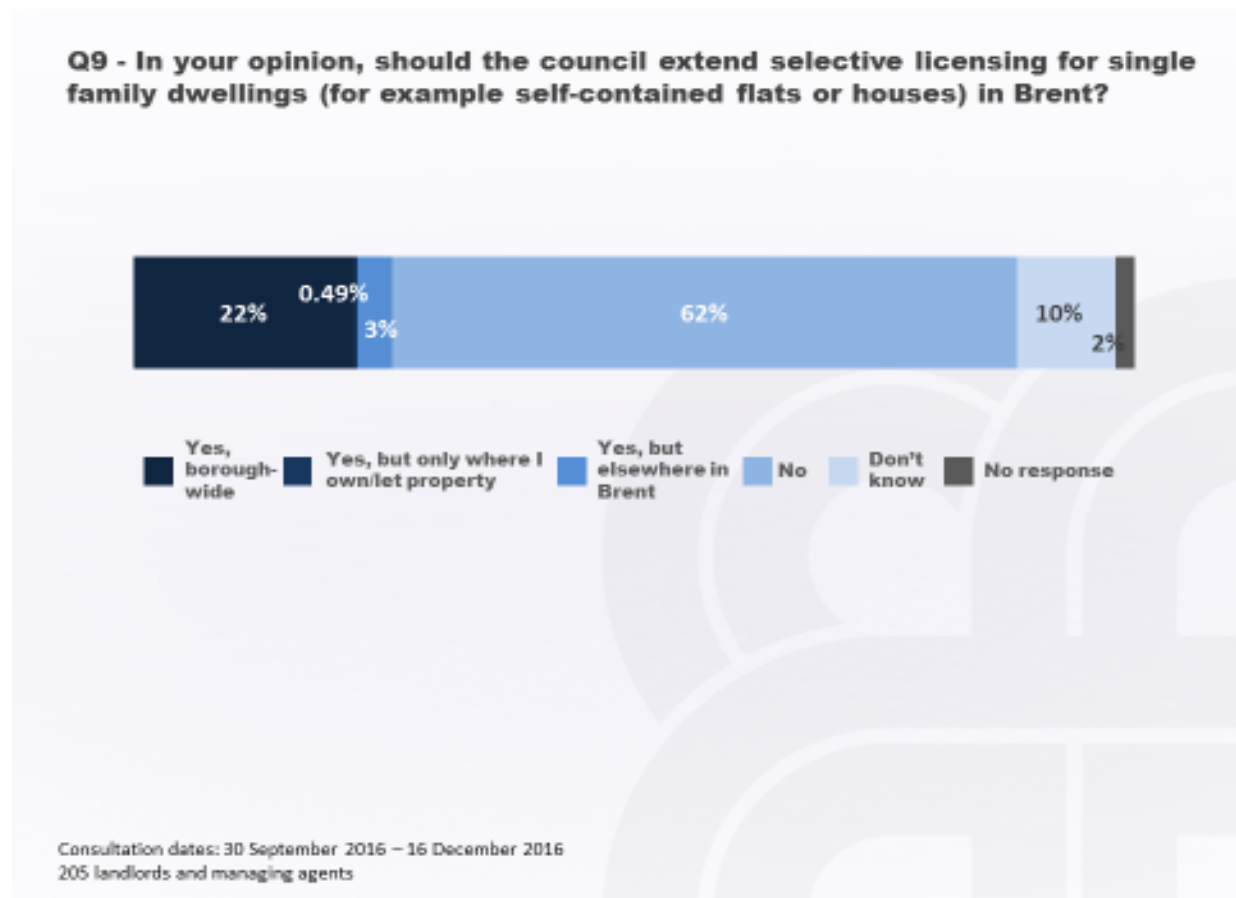


Figure 23

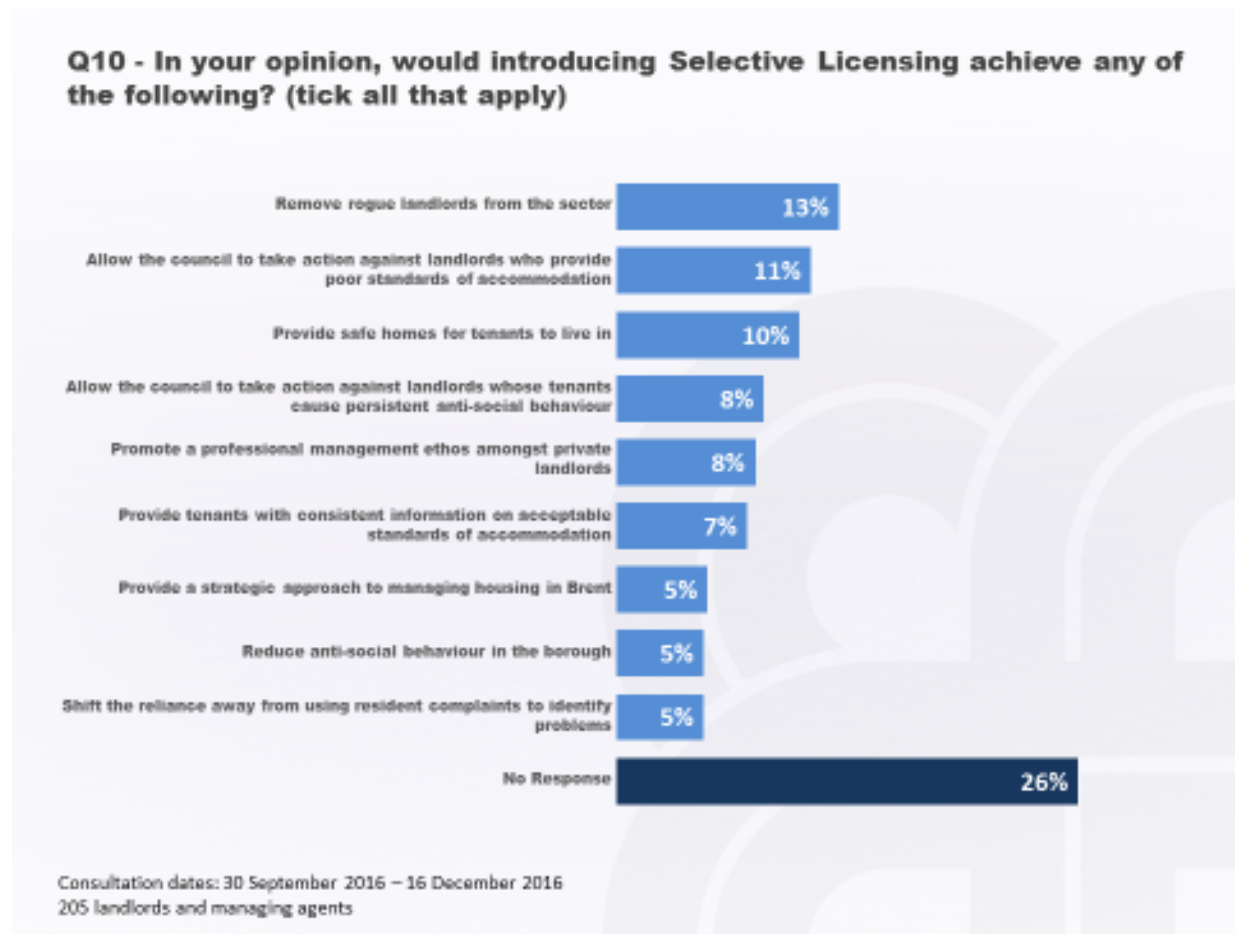


Figure 24

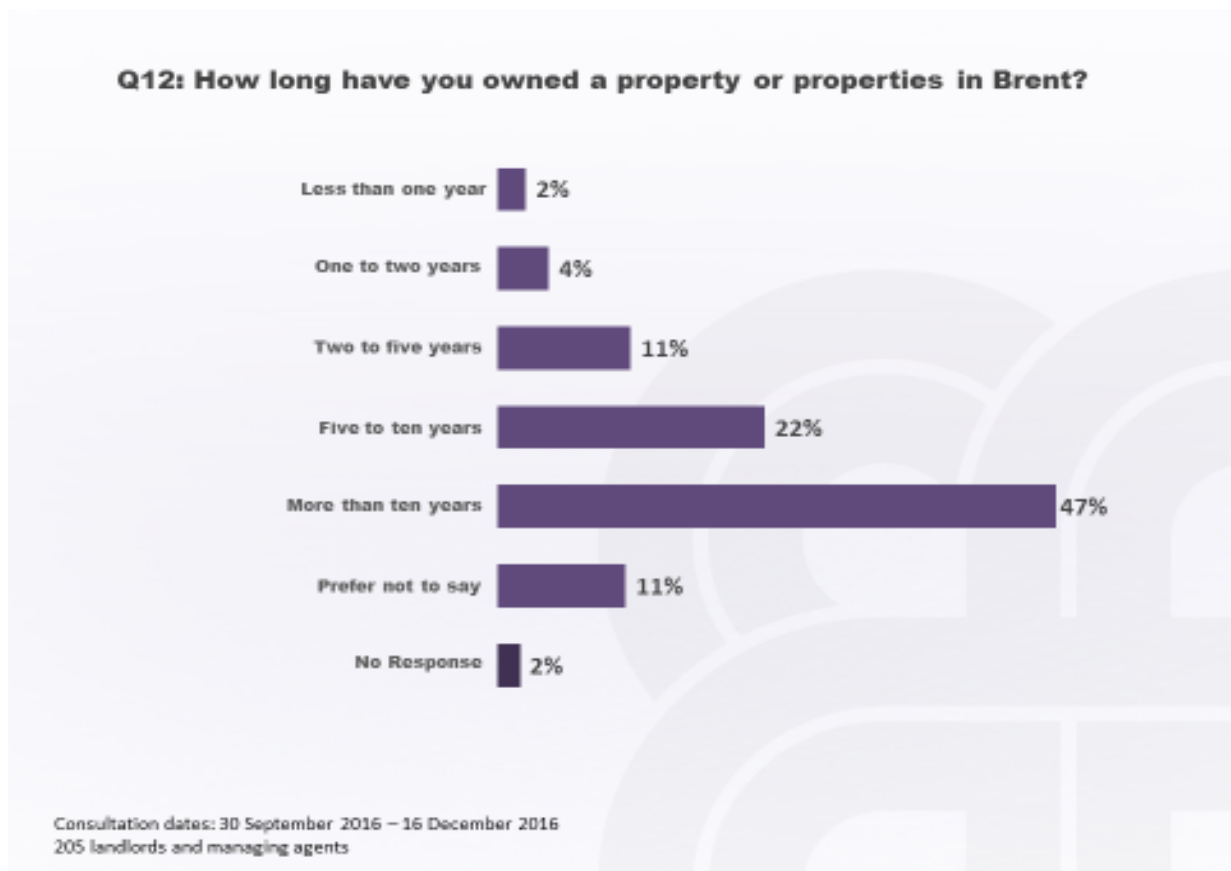


Figure 25

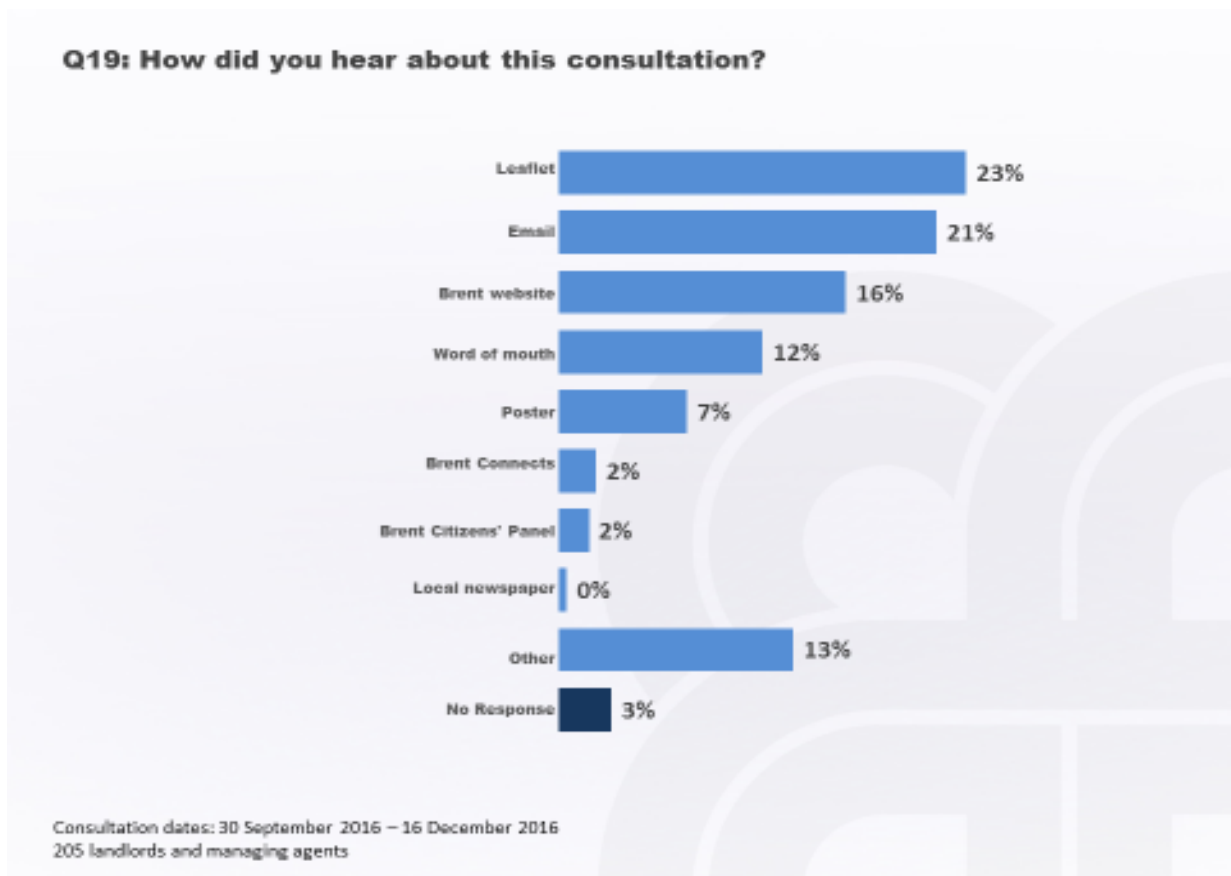
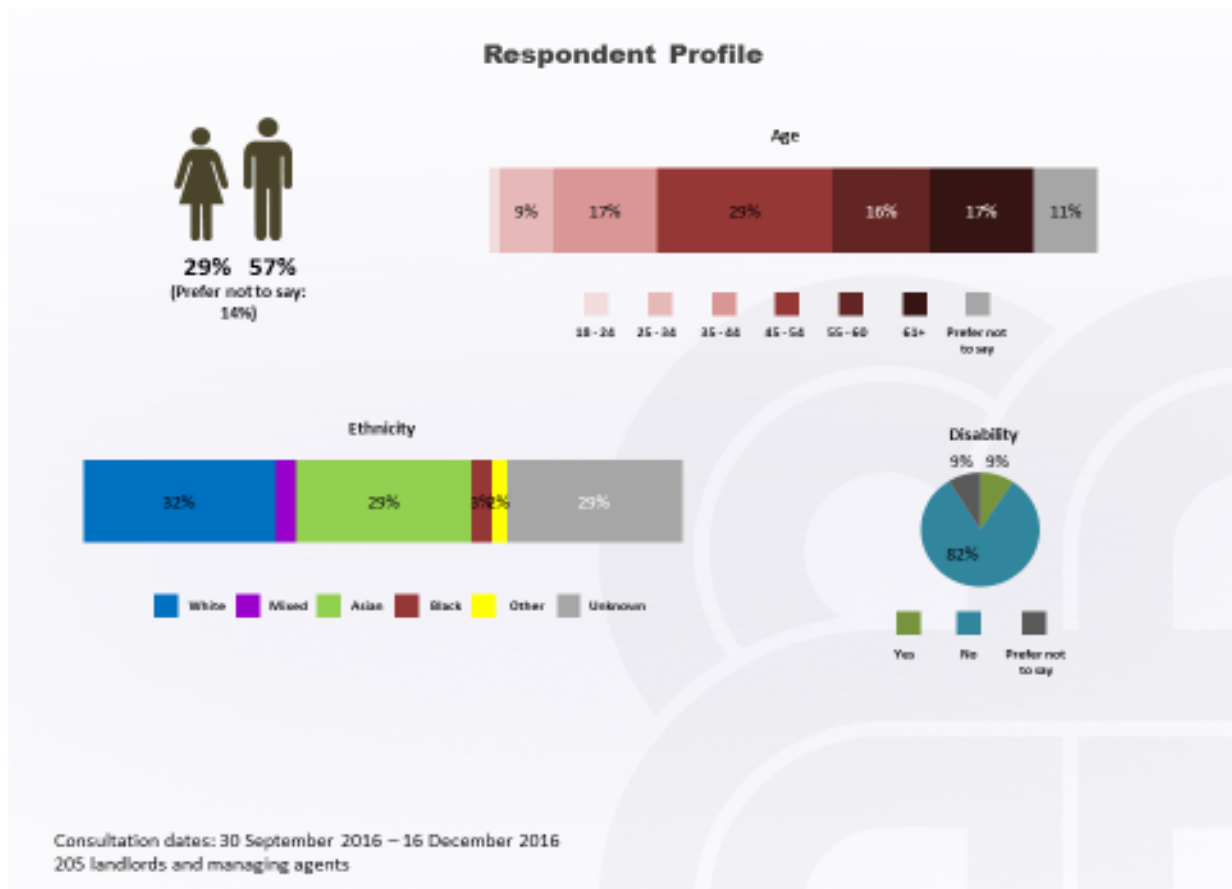


Figure 26



PRS Licensing 2016 Questionnaire Consultation Responses – Other Stakeholders

Figure 27

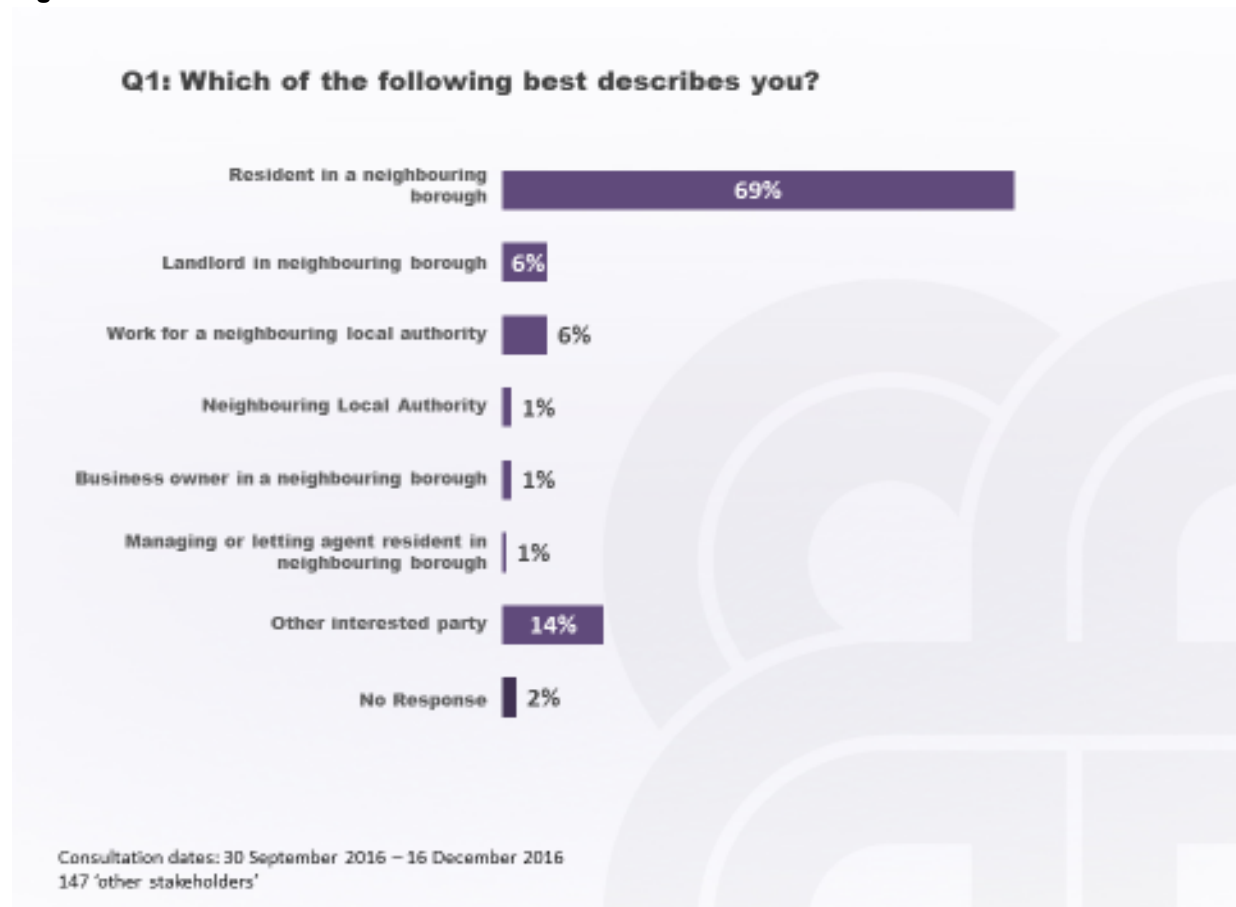


Figure 28

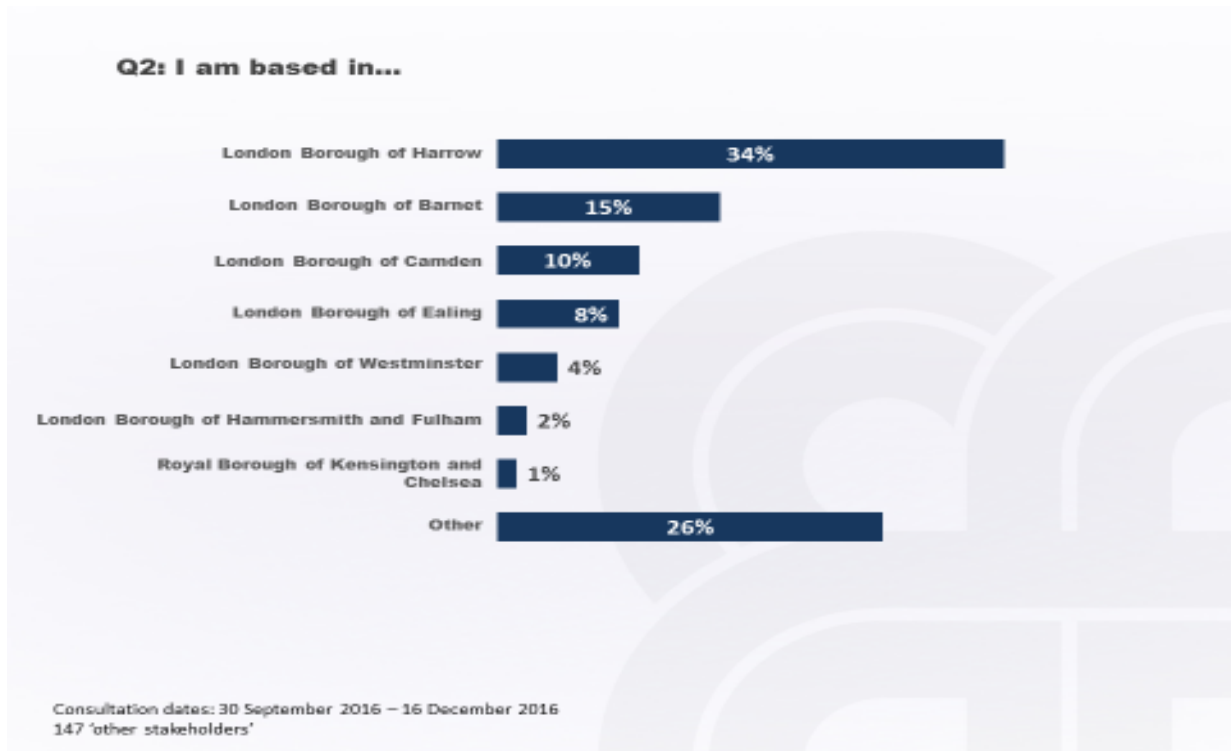


Figure 29

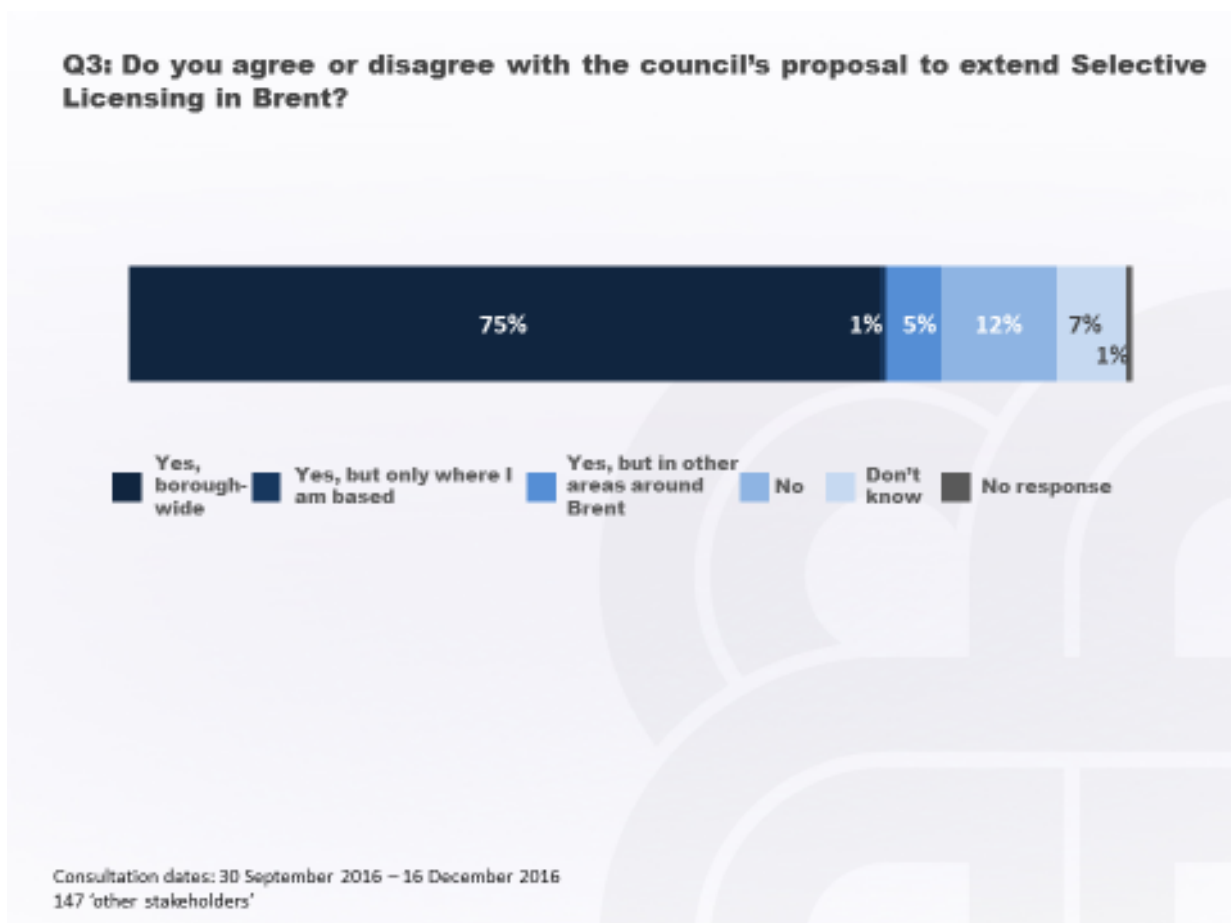


Figure 30

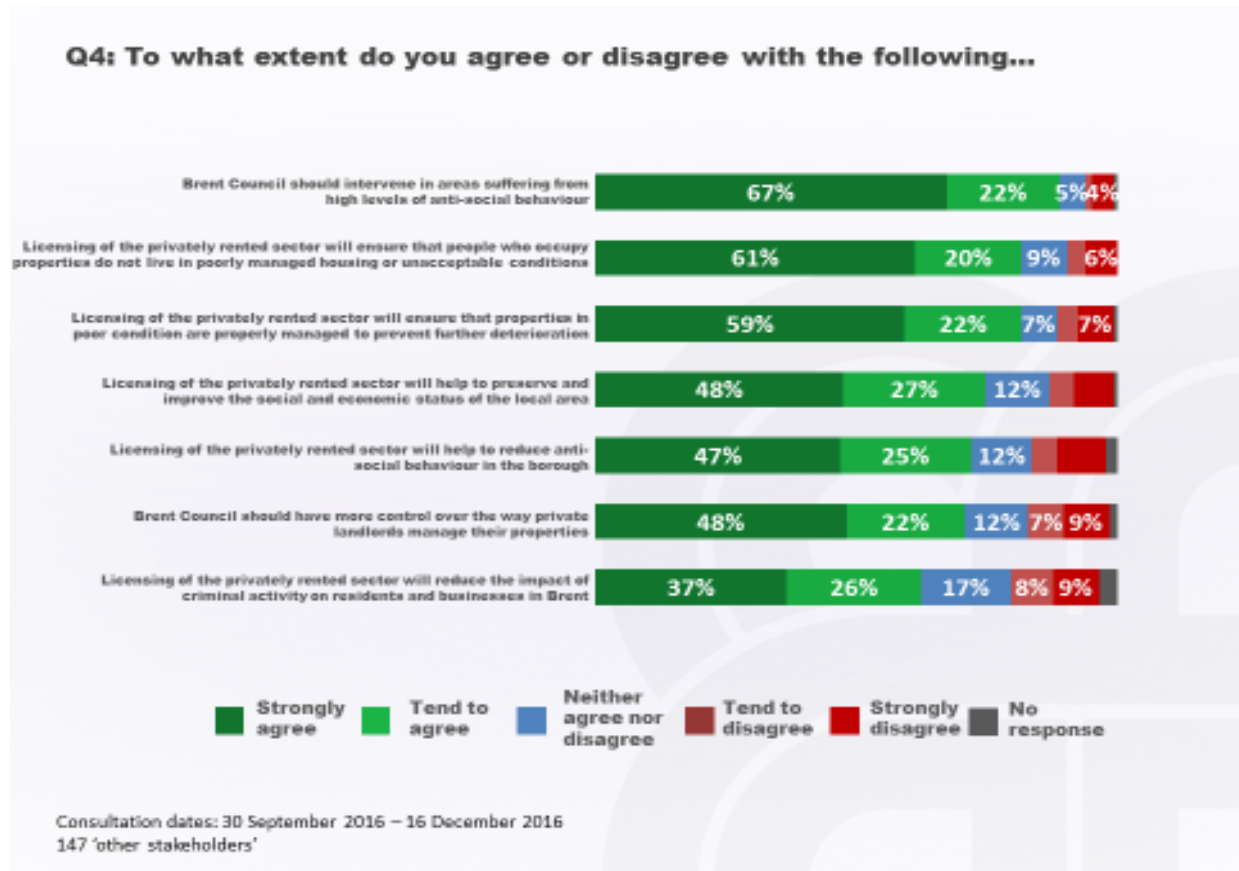


Figure 31

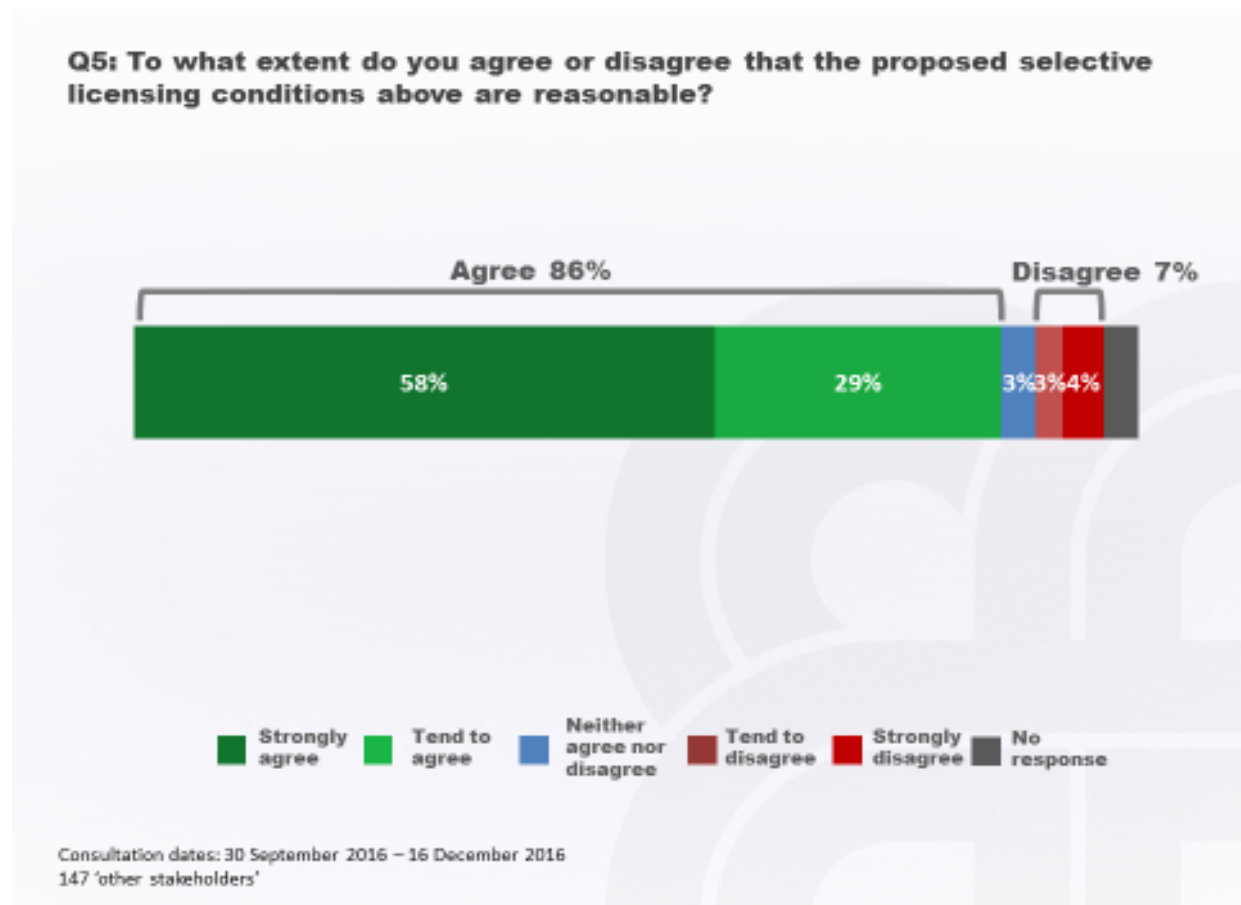
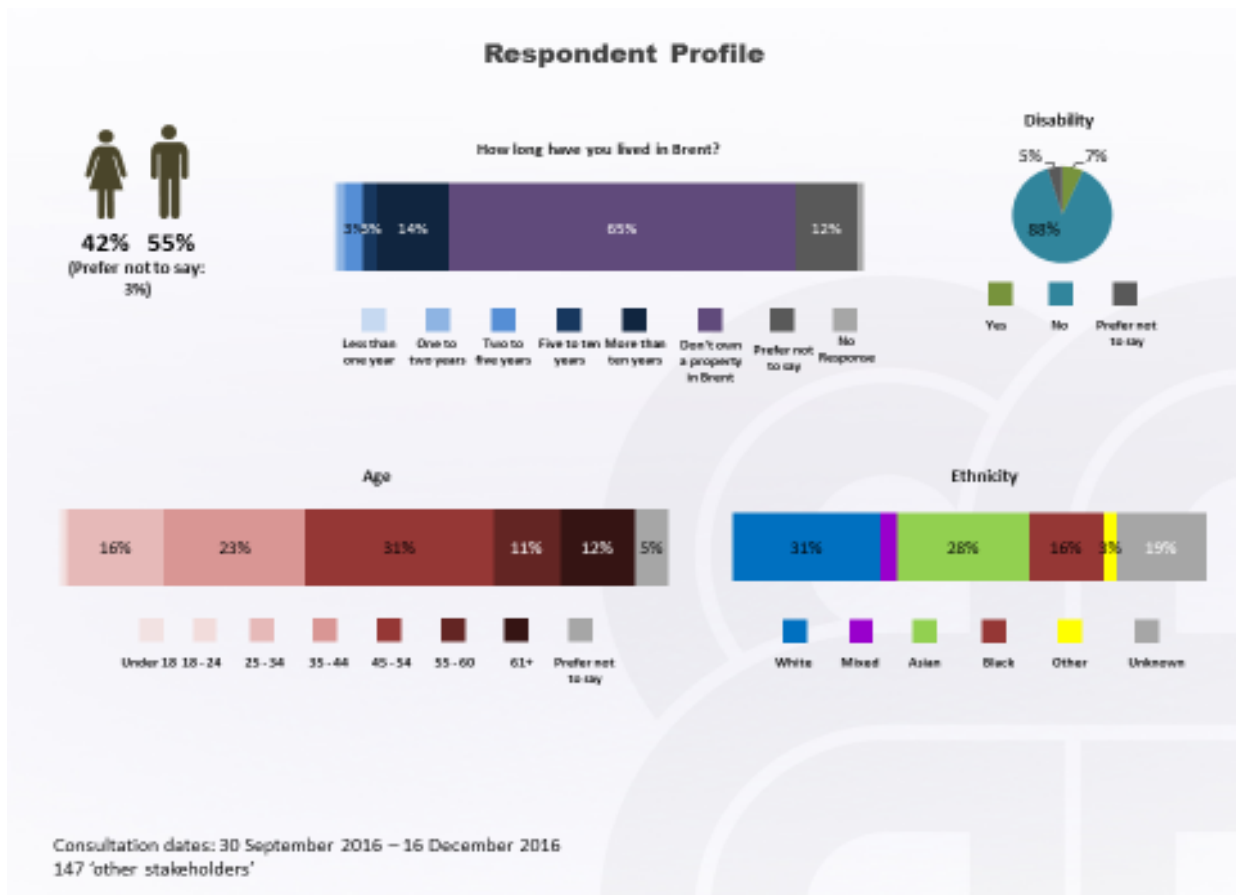


Figure 32



Appendix D: Written submissions





National Landlords Association:

Response to Brent Council's proposal for Selective Licensing

December 2016

Introduction

1. The National Landlords Association (NLA) exists to protect and promote the interests of private residential landlords.
2. The NLA represents more than 72,000 individual landlords from around the United Kingdom. We provide a comprehensive range of benefits and services to our members and strive to raise standards within the private rented sector (PRS).
3. The NLA seeks a fair legislative and regulatory environment for the private rented sector while also aiming to ensure that landlords are aware of their statutory rights and responsibilities.
4. The NLA would like to thank Brent Council for providing the opportunity to comment on the Selective Licensing consultation.

Executive Summary

5. Having considered the evidence presented and having undertaken its own evaluation of the circumstances faced by the residents of Brent, the NLA's position can be summarised by the following brief points:
 - Landlords have very limited authority to deal with matters related to anti-social behaviour (ASB), especially if it happens outside the curtilage of the property.
 - The scheme will lead to a further displacement of problem tenants in Brent/London.
 - The documentation provided fails to indicate that sufficient funding will be available to support the functions necessary to support licensing in cases involving rehousing, tenants with mental health issues and social inclusion.
 - How will the Council prevent malicious ASB claims being made that could potentially result in tenants losing their tenancies?
 - Selective licensing is not a solution in itself – it does not tackle sub-letting or criminals.
6. The NLA contends that the flaws outlined below in the process and proposals must be rectified prior to attempting to progress this application. Furthermore, once the necessary data has been identified and provided, this consultation exercise should be repeated (if permissible), ensuring engagement with all relevant stakeholders.

General Feedback on Proposals

7. The ability to introduce licensing is a powerful tool. If used correctly by Brent Council, it could resolve a number of specific issues, as has been seen in the three wards in which the scheme is currently run in. The NLA has supported many local authorities when licensing schemes have been introduced that could benefit landlords, tenants and the community. But to extend the scheme Borough wide we believe is unjustified.
 8. The NLA believes that any regulation of the private rented sector needs to be balanced and that additional regulatory burdens should focus on increasing the professionalism of landlords, the 3 quality of the private rented stock and driving out the criminal landlords who blight the sector.
-

These should be the shared objectives of all the parties involved to facilitate the best possible outcomes for landlords and tenants alike and, as such, good practice should be recognised and encouraged, in addition to the required focus on enforcement activity. This is not the case here.

9. In addition, the proposal does not take into account rent to rent or those that exploit people (tenants and landlords), as criminals will always play the system. For instance, there is no provision for those landlords who have legally rented out a property that is then illegally sublet. The Council is not allocating resources to tackle the problems that criminals will cause, where landlords are often victims just as much as tenants are.
 10. However, in the present case, the Council is saying that the scheme can be delivered within the fees raised by the scheme, but this has been shown across the country not to work. Therefore, unless the Council is willing to allocate sufficient resources, we believe that the scheme cannot deliver what it hopes to achieve. This is a gross misrepresentation to the tenants, the community and to the landlords. In the case of a funding shortfall, the introduction of the scheme will undoubtedly have an impact on other Council services.
 11. Landlords are usually not experienced in social care and do not have the professional capacity that would allow them to be able to resolve tenants' mental health issues or drug and alcohol dependency. If there are allegations about a tenant causing problems (e.g. ASB, noise nuisance), even if the tenant has the above issues, a landlord ending the tenancy will have dispatched their obligations under the discretionary licensing scheme. However, in reality, this just moves the problems around Brent, but does not actually help the tenant, who could even become lost within the system. There is no obligation within Selective Licensing for the landlord to solve the ASB allegation; rather, a landlord has a tenancy agreement with the tenant and this is the only thing they can legally enforce.
 12. Brent Council has many existing powers. Section 57 (4) of the Housing Act 2004 states that a local authority "must not make a particular designation ... unless (a) they have considered whether there are any other courses of action available to them ... that might provide an effective method of dealing with the problem or problems in question". The use of these powers, which are listed below, by the Council shows that the Council already has powers that can be used to rectify the problems and, hence, the ability to tackle many of the issues that they wish to overcome in all parts of Brent:
 - a) Criminal Behaviour Orders;
 - b) Crime Prevention Injunctions;
 - c) Interim Management Orders;
 - d) Empty Dwelling Management Orders;
 - e) Issuing improvement notices to homes that don't meet the decent homes standard;
 - f) Directions regarding the disposal of waste (for example, under Section 46 of the Environmental Protection Act 1990);
 - g) Litter abatement notices under Section 92 of the Environmental Protection Act 1990; 4
 - h) Powers under the Noise Act 1996 to serve fixed penalty notices or to confiscate equipment (Sections 8 and 10);
 - i) The power to require rubbish to be removed from land under Sections 2–4 of the Prevention of Damage by Pests Act 1949.
-

13. Could the Council also provide a breakdown of the number of times these orders and powers have been discharged across Brent and in the area that the Council proposes to designate for selective licensing?
14. Landlords outline to tenants at the start of the tenancy their obligations in relation to noise, just as they do with waste and what they have to do to comply with the relevant laws and with a view to respecting their neighbours. The landlord can only manage a tenant based on their contract for living in the rented property, not for activities in the street or in neighbouring streets. In the case of noise, the Council would need to inform the landlord that the tenant's noise is in excess. The power that a landlord has then is either to warn the tenant or to end the tenancy. If the allegation is false or disingenuous, how is the landlord to know? If the same allegation is made on more than one occasion, the landlord may still be ending the tenancy based on an unproven allegation. Or by the Council saying there is a problem. This does not solve the problem but rather moves the problem around the Borough. The same applies to waste and ASB issues. The tenant would then be considered as guilty – but will have faced no trial. Under the reference condition of the Selective Licensing scheme, an accusation that has not been tested in a court, but for which a guilty judgement has been given, would then prevent a person from renting a property.
15. The risk of introducing licensing is likely to increase the costs for those renting, along with not resolving the problems that the Council wishes to resolve, and likely moving the issue around the Borough/London. The issues are thus not fully dealt with but instead are displaced to new landlords. If Brent were to take a more erudite approach with regard to nuisance issues and instead developed a separate policy to tackle criminal landlords, this would be more applicable and more likely to result in resolving many of the issues.

Negative Impacts of Discretionary Licensing

16. One of the dangers of the proposed Selective Licensing scheme is that the costs will be passed on to tenants, thus increasing the costs for those who rent in Brent, along with increasing the Council's costs. The increasing costs to residents in Brent would particularly hit hard the most vulnerable and least able to tolerate a marginal increase in their cost of living. Also, the Council has failed to explain that, as well as the Council's costs for the licence, the landlords' costs will likely be covered by tenants too, thus further increasing the rents. The failure to explain this shows a lack of understanding of how the private rented sector works.
 17. Areas that have been subject to the introduction of selective licensing have seen lenders withdraw mortgage products, thereby reducing the options to landlords reliant on finance. Downstream, this increases landlords' overheads and, subsequently, the costs for tenants rise. Also, the fact that the lenders have withdrawn the mortgage availability for a landlord will show up on the credit history of that landlord. This will likely lead to higher costs for the landlord accessing alternative lending as 5 other mortgage lenders will put a higher cost on the landlord, who will ultimately pass the higher cost on to the tenant.
 18. Brent Council, by proposing the introduction of licensing, is implying that there are social problems that could deter investment in the area. However, there is no acknowledgement of the impact this stigmatisation of discretionary licensing would likely have on the effected locality in the consultation. This should be explored and detailed in the evidence case supporting this application. The NLA would assert that the failure to provide such information is an indication of a substandard and ultimately superficial consultation exercise.
-

19. What consideration has the Council taken in relation to potential homelessness when tenants cannot access the private rented sector?

Resources

20. Often when tenants near the end of their contract/tenancy and they are in the process of moving out, they will dispose of excess waste by a variety of methods, which often includes putting it out on the street for the Council to collect. A waste strategy for the collection of excess waste at the end of tenancies needs to be considered by local authorities with a large number of private rented sector properties in areas. This is made worse when councils do not allow landlords to access municipal waste collection points. The NLA would be willing to work with the Council to help them develop this strategy.
21. The social housing sector has made many efforts to remove problem tenants (2/3rd of all court evictions are from the social sector). How does the Council expect landlords to solve the issues of these tenants when the professional sector has so far failed to do so? Many of the tenants that have been removed from the social sector are now living in the private rented sector without any of the support they might otherwise have received in the social sector.

Current Law

22. There are currently over 100 pieces of legislation that a landlord has to comply with. The laws that the private rented sector has to comply with can be easily misunderstood. A landlord is expected to give the tenant a “quiet enjoyment” of the property, and failure to do so could result in a harassment case being brought against the landlord. Thus, the law that landlords have to operate within is not fully compatible with the aims that the Council hope for. For example, a landlord keeping a record of a tenant could be interpreted as harassment.
 23. The introduction of licensing is proposed to tackle specific issues, of which many of these are tenant related and not to do with the property/landlord. Thus, the challenge is for local authorities to work with all the people involved and not to just blame one group – landlords. The NLA is willing to work in partnership with the Council and can help with developing tenant information packs, assured short-hold tenancies and the accreditation of landlords, along with targeting the worst properties in an area.
 24. The NLA would also argue that a problem encompassing a few poorly managed and/or maintained properties would not be appropriately tackled by a licensing scheme, which is not proportional to the problem. In many situations, the Council should consider Enforcement Notices and Management Orders. The use of such orders could deliver results immediately – so why instead does the Council wish to do this over five years through a licensing scheme? Adopting a targeted approach on a street-by-street approach, targeting the specific issues and working in a joined-up fashion with other relevant agencies, such as the Council, community groups, tenants and landlords, would have a much greater impact.
 25. The NLA agrees that some landlords, most often due to ignorance rather than criminal intent, do not use their powers to manage their properties effectively. A more appropriate response therefore would be to identify issues and to assist landlords. This could allow Brent Council to focus on targeting the criminal landlords – where a joint approach is required.
-

26. The NLA would also like to see Brent Council develop a strategy that also included action against any tenants that are persistent offenders. These measures represent a targeted approach to specific issues, rather than a blanket-licensing scheme that would adversely affect all landlords and tenants alike while still leaving criminals able to operate under the radar. Many of the problems are caused by mental health and drink and drug issues, these are issues that landlords cannot resolve and are issues that will require additional resources from the Council.
27. You fail to provide what additional services will be provided in the area for mental health. This will have an impact on adult social care budgets from the County Council. How much money has been allocated from the County to meet this, especially as this budget is under pressure already?
28. The Council should consider alternative schemes, such as the Home Safe Scheme in Doncaster and SEAL in Southend. Both schemes offer alternatives that the Council has not reviewed or presented in the consultation.

Consultation Critique

29. In relation to ASB reduction and the authority a landlord has to tackle such activity within their properties, it should be pointed out that landlords and agents can only enforce a contract. They cannot manage behaviour (ref: House of Commons briefing note SN/SP 264, paragraph 1.1). In most circumstances, the only remedy available to landlords confronted with cases of serious ASB in one of their properties will be to seek vacant possession, and in many instances, they will need to serve a Section 21 notice rather than a Section 8 notice identifying the grounds for possession. The former is simpler and cheaper and repossession (at present) is more certain. No reason needs be given for serving a Section 21 notice, and in this case, the perpetrator tenant can hypothetically approach the local authority for assistance to be re-housed (ref: Homelessness Guidelines cl 8.2). Crucially, no affected party needs offer evidence against an anti-social householder, thereby reducing the risk of intimidation, harassment and ultimately unsuccessful possession claims. The issue of ASB will thus not appear as a factor in the repossession. However, in providing evidence to support a licensing application, the document should clarify for the respondents the position of all the relevant issues under landlord and tenant law.
30. It is also worrying how little reference has been made to the economic impact on the local community from the likely increase in the costs of housing provision. We wish to understand how the Council believes increasing said costs could benefit those on fixed incomes. The logic of this assertion is not clearly explained and will arguably lead to incorrect conclusions on the part of those stakeholders relying on the Council to inform their input into this consultation.

Requests for Supplementary Information

31. Clarification on the Council's policy in relation to helping a landlord when a Section 21 notice is served is required within the proposed Selective Licensing scheme. It would be useful if the Council could put in place a guidance document before the introduction of the scheme to outline the Council's position regarding helping landlords remove tenants who are causing ASB.
 32. The NLA would like further explanation on how the Council will work with landlords to mitigate the issue of tenants leaving a property early but where they still have a tenancy contract.
 33. If a landlord faces challenges with a tenant, how will the Council help the landlord?
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Appendix D – NALS Proposed Selective Licensing Scheme in the London Borough of Brent

National Approved Letting Scheme (NALS) Consultation Response

14 December 2016

An Introduction to NALS

NALS is an accrediting organisation for lettings and management agents in the private rented sector. NALS was established in 1999, by the Empty Homes Agency, with backing from the Royal Institution of Chartered Surveyors (RICS) the Association of Residential Lettings Agents (ARLA) and the National Association of Estate Agents (NAEA). NALS provides an overarching quality mark, easily recognised by consumers, with minimum entry requirements for agents.

NALS agents are required to:

- deliver defined standards of customer service
- operate within strict client accounting standards
- maintain a separate client bank account
- be included under a Client Money Protection Scheme

Agents must provide evidence that they continue to meet NALS criteria on an annual basis, in order to retain their licence. The scheme operates UK wide and has 1500 firms with over 2000 offices, including a number of agents within the London Borough of Brent.

NALS is recognised by the GLA as an approved body for the London Rental Standard. We have also become a co-regulation partner with Liverpool City Council and a recognised training provider under the Rent Smart Wales scheme.

NALS also administers the SAFEagent campaign (www.safeagents.co.uk), the purpose of which is to raise consumer awareness of the need to ensure that landlords and tenants should only use agents who are part of a Client Money Protection Scheme which offers reimbursement in the event that an agent misappropriates their money. The campaign is recognised by Government and the SAFE agent logo appears in their How to Rent guide (www.gov.uk/government/publications/how-to-rent).

We very much welcome the opportunity to contribute to this consultation exercise.

Overview

We understand that Brent Council is seeking to introduce a second selective licensing scheme to complement the existing additional and selective licensing schemes that were introduced by the council in January 2015.

Having studied the consultation documents, we remain somewhat confused about the size and extent of the proposed licensing scheme. In paragraph 4.1 of the consultation proposal, it says:

“The Council is proposing that selective licensing is extended to all or some other wards within Brent”.

and in paragraph 8.0 it says:

“...proposals to extend selective licensing to all, or most areas of the borough”.

We can find no explanation setting out what is meant by ‘some other wards’ or ‘most areas’. As such, we have made the assumption that the proposal involves extending the selective licensing scheme borough wide.

It is our view that if any alternative proposal is developed post-consultation, it should be subject to a further round of consultation in accordance with the Housing Act 2004. We think that all interested parties should be given the opportunity to submit representations on the actual proposal before it is presented to the Cabinet for approval.

One of our concerns about the roll-out of new licensing schemes is the lack of consistency that this brings in the regulation of the private rented sector. We understand there are already over 20 separate licensing schemes operating in London, each with different terms and conditions. This creates difficulty and confusion for larger portfolio landlords and letting agents in trying to understand what schemes apply where, with associated compliance risks.

Given the government’s recent decision to expand the mandatory HMO licensing scheme in 2017, we would encourage the council to place any new scheme on hold in order to concentrate efforts on implementing and enforcing the extended mandatory HMO licensing scheme and the associated transitional arrangements.

The council should also prioritise effective resourcing of the licensing schemes that were implemented in January 2015. Whilst the mandatory HMO and selective licensing schemes appear to have been reasonably successful, the same cannot be said for Brent’s additional licensing scheme.

According to the consultation report, approximately 16,000 applications had been expected under the additional licensing scheme and yet almost 2 years into the five-year scheme, only 1,348 applications have been approved – only 8% of the expected number.

Paragraph 5.2 of the report says:

“In seeking to deal with the poor standards of those properties which are outside the Harlesden, Wembley Central and Willesden Green selective designation and including for the large number of HMOs whose owners have neglected to apply for licences, our standard enforcement regime can be complicated, time-consuming and expensive. This makes it difficult for us to act quickly against poorly-managed private rented properties....”

and paragraph 6.0 says:

“There is evidence however that many HMOs in the borough remain unlicensed, poorly managed and are in an unsatisfactory state of repair. We are clearly of the opinion that extending selective licensing will greatly benefit efforts to improve the uptake of HMO additional licences”.

We do not think it is logical to say that with so few applications submitted under the current licensing scheme, it supports the business case to introduce licensing for another 16,000 single family rented properties. The new licensing scheme would need to be enforced using the same ‘complicated, time-consuming and expensive’ regime that the council is already finding problematic.

We also note that this blanket licensing scheme would need Secretary of State approval, whereas the government have already highlighted their objection to the introduction of such blanket schemes. The government’s view on this issue was reinforced when they rejected a proposal by Redbridge Council for a borough wide selective licensing scheme in late 2015.

Given so little progress has been made in implementing the existing additional licensing scheme, we think the council should be utilizing their resources to promote and enforce the existing scheme before considering the introduction of another scheme.

Extending selective licensing – the evidence base

Having examined the evidence base that accompanies the consultation proposal, we can see there are certainly issues with crime, anti-social behaviour and poor housing conditions in some parts of the borough.

We do support the council's wider objective around driving up standards and conditions in the private rented sector.

Having said that, some of the evidence offered in support of the selective licensing proposal is the same evidence used to justify the introduction of additional and a more limited selective licensing scheme in January 2015.

The HQN report from 2013 highlights:

"The wards with the most incidences of anti-social behaviour are concentrated in the south and east of the Borough. These wards have relatively high levels of private rented sector stock apart from Stonebridge which has a high concentration of social housing".

In the council's report, more recent data on Police ASB calls, crime reporting, noise, fly-tipping and council recorded ASB show a similar pattern with most issues concentrated in the South and East of the Borough.

We can find no breakdown to show how many of these crime and anti-social behaviour issues relate to the estimated 16,000 HMOs that already need licensing under the council's additional licensing scheme, but where few applications have yet been received.

To justify a second selective licensing scheme, the council should look more specifically at issues associated with single family rented properties that are outside the existing selective licensing area in Harlesden, Wembley Central and Willesden Green.

Further, we think the council should first evaluate the effectiveness of the current selective licensing scheme and the impact it is having on driving down levels of ASB within those three wards. Simply looking at how many properties have been licensed is, we think, of more limited value. We would like to see a more evidence based approach that is open to public scrutiny. For example, how many of the selectively licensed properties have been inspected, how many were found to have serious hazards that required intervention by the council and how does this compare to HMOs that have been licensed under the additional or mandatory HMO licensing scheme?

The council has indicated that one of their criteria for introducing borough wide selective licensing is poor housing conditions. To introduce a scheme on that basis, the council must intend to inspect those selectively licensed properties during the life of the scheme, which would be a significant resourcing issue. We think this further reinforces the case for a more targeted approach.

Regarding the migration, deprivation and crime criteria, government guidance makes clear that simply showing these issues exist does not suffice. The council must set out how they think such issues can be effectively addressed, what other courses of action have been considered and what the council hopes that the designation will achieve. The government guidance states:

“Only where there is no practical and beneficial alternative to a designation should a scheme be made”.

Source: Selective licensing in the private rented sector; a guide for local authorities; March 2015

Based on the evidence that has been published, we do not think the case has been proved to extend selective licensing borough wide.

Exploring opportunities for co-regulation

Following our successful co-regulation partnership arrangement with Liverpool City Council, we would encourage Brent Council to consider adopting a similar approach in order to achieve more balanced and effective regulation of the private rented sector.

Co-regulation can facilitate a light-touch approach to monitoring compliance amongst regulated letting agents, whilst freeing up local authority resources to tackle the minority of rogue landlords and agents that seek to evade their responsibilities and place their tenants' lives at risk. In describing this innovative co-regulation approach, a Liverpool City Council Councillor said:

“It is a win-win for everyone, because their members benefit from a reduced fee and we are able to target our resources at those landlords who we know aren't meeting the standards.”

We would be very happy to meet with Brent Council to explore options for developing a co-regulation model that helps to deliver better regulation of the private rented sector.

Licensing fees

We recognize that the council needs to charge a reasonable fee to cover the cost of administering and enforcing their licensing schemes. Overall, we think that the proposed application fee of £540 per property is less excessive than fees being charges in some other areas.

However, we think there is scope to further improve the fee structure, whilst minimising the cost of compliance for regulated letting agents.

We note that Brent Council propose to offer a £40 discount to accredited landlords, but offer no such discount to designated managing agents. We think is a missed opportunity that could help to encourage best practice in the local lettings industry.

We would encourage the council to give this matter further thought and to implement an accreditation discount on a percentage basis, in the region of 20%. This would bring Brent into line with other London Boroughs such as Southwark and Islington.

Further, we think the discount should be linked to the accreditation of landlords and letting agents, regardless of whether the licence holder or the designated manager is accredited. The discount should be offered to members of all accreditation schemes that have been approved by the GLA under London Rental Standard (LRS), such as the National Approved Letting Scheme. This in turn would help to encourage more effective management of private rented homes in the borough.

This approach has already been adopted by Islington and Ealing Councils and we would strongly encourage Brent Council to follow best practice and do the same.

We welcome the proposal to offer an early bird discounted fee of £340 to reward compliant landlords and agents and to aid the smooth implementation of the scheme. To make this work effectively, it is important that:

- The council's licence application process needs to be in place and fully operational before the council start to accept applications;
- Applicantsshouldbegiventheopportunitytoapplyforalicenseforatleast three months prior to the start of the scheme; and
- The council need to invest in extensive promotional activity, both within and outside the borough, throughout the pre-application period. NALS can assist in promoting the scheme amongst our members if the Council notify us once a scheme designation has been made.

Licence Conditions

We do not support the proposal by Brent Council to place 22 standard licence conditions on each and every selective licence. We do not think it is necessary or appropriate to replicate existing statutory requirements as licence conditions.

It is important to remember that breach of any licence condition is a criminal offence and so conditions must be appropriately worded and only cover situations over which the licence holder has control. We note that in the introduction, it incorrectly refers to each offence leading to a maximum fine of £5,000. The rules changed in 2015 and we would point out there is now no upper limit.

Whilst we have not responded in detail on all the conditions, there are some particular issues we would highlight:

Condition 4: It is already a requirement for any deposit to be protected by law and so we are unsure why this needs to be repeated. We would also point out that the requirement to provide prescribed information is within 30 days and not immediately, as indicated in the condition. The licence condition should not be more onerous than the legal requirements already in place.

Condition 10: It is unusual for a local authority to insist that the front door to every property rented to a single family is fitted with a thumb turn lock. This is only normally required in Houses in Multiple Occupation (HMOs). We would ask that this requirement is deleted. It may also invalidate a landlord or tenants insurance policy by reducing home security.

Condition 13d. It is already a legal requirement for a landlord and/or agent to comply with a housing enforcement notice.

Condition 14. The reference to compliance with the council's prescribed standards normally relates to HMOs as there are no prescribed standards for single family lets. As all HMOs are required to be licensed under the additional licensing scheme, this condition is not required.

Condition 22. Whilst NALS licensed firms would always seek to facilitate any request for the council to inspect the property, we would point out that the tenant's right to quiet enjoyment means they are unable to guarantee a tenant will grant access on any particular day or time. As such, we would suggest the first sentence is amended to read 'The licence holder must take all reasonable steps to ensure access is granted when requested....'

We would encourage Brent Council to reflect on these comments and consider any necessary changes to the proposed licence conditions.

All NALS licensed firms are already required to comply with defined standards of customer service and to ensure that properties are effectively managed. Any complaint from the landlord or tenant can already be independently investigated through a government-approved redress scheme.

Delivering effective enforcement

It is vital that Brent Council maintains a well-resourced and effective enforcement team to take action against those landlords that seek to evade the licensing scheme completely. We are pleased to see Brent Council have significantly stepped up their enforcement activity over the last 12 months.

Without effective enforcement, new regulatory burdens will fall solely on those that apply for a licence whilst the rogue element of the market continue to evade the scheme and operate under the radar.

Regulation of letting agents

To achieve better regulation of the private rented sector and improve consumer protection, it is important that Brent Council take a holistic approach that extends far beyond the proposed licensing scheme.

Since October 2014, it has been a requirement for all letting agents and property managers to belong to a government-approved redress scheme. In May 2015, a further requirement was introduced requiring agents to display all relevant landlord and tenant fees, the redress scheme they belong to and whether they belong to a client money protection scheme, both in-store and on the company's website.

We would like to see Brent Council commit to proactive enforcement of these rules including, where appropriate, serving civil penalty notices, the income from which can help to fund the enforcement activity. By effectively regulating letting agents that operate within the borough, it will help to ensure the properties are more effectively managed and improve consumer protection.

In June 2016, NALS published an Effective Enforcement Toolkit to assist local authorities with this task. The toolkit can be downloaded free of charge from the NALS website (www.nalscheme.co.uk).

Should you wish to discuss any aspect of this consultation response, please do not hesitate to contact me. Can you also please confirm the outcome of the consultation exercise in due course?

Isobel Thomson

Chief Executive

National Approved Letting Scheme

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14 December 2016



Appendix D – HomeSafe Ltd

Response from The Home Safe Scheme Ltd to the Proposal by Brent Council to extend their Selective Licensing Scheme to a wider area of the Borough

This document is a response to the proposal to implement a Selective Licensing scheme throughout a wider area of Brent than is currently the case. We would ask that it is included in the formal consultation response report and circulated amongst the elected members who will be making the decision on the implementation of this scheme.

Summary

The Home Safe Scheme Ltd (www.thehomesafescheme.org.uk) is a private sector organisation that was set up as a result of the implementation of a Selective Licensing regime in the Hexthorpe area of Doncaster. Following on from the responses to the public consultation on this scheme Doncaster Metropolitan Borough Council (DMBC) agreed to modify their scheme to enable a “Co-regulation” regime to operate in the area as opposed to the usual version of Selective Licensing. The Home Safe Scheme Ltd (Home Safe) is the “Co-regulation” partner with which DMBC is working in the Hexthorpe area for the 5 year term of the Licence period.

Home Safe is now also the “Co-regulation” partner of West Lindsey District Council in the operation of the Selective Licensing scheme in the South West ward of Gainsborough (which received its licensing designation in April 2016 and which went live in July 2016).

We agree, from the information provided by Brent Council in the course of their Consultation, that there is a problem with some private rented sector properties in the area and commend them for having taken action to deal with this problem but would like, in the context of extending licensing further, to propose an alternative (and innovative) solution to that problem. Unlike many other landlord groups or associations, we are in full agreement that the current system in the private rented sector is failing in many areas nationally, that the private rental market is in a state of flux and that there are deep rooted issues throughout the sector that need to be addressed by all stakeholders.

We understand that Councils have limited tools and, therefore, also understand the attraction of using Selective Licensing as one of those tools to try and deal with the problems evident in the sector. Our position, however, is that Selective Licensing, in its raw form, is ineffective but that it can be quantifiably effective if deployed via the mechanism of “Co-regulation” as defined by The Home Safe Scheme partnerships with Doncaster and West Lindsey Councils.

We at Home Safe believe that we are the founders (along with DMBC) of this alternative and innovative approach, already operational in Doncaster and Gainsborough, and that we can offer Local Authorities the ability to deliver Selective Licensing without opposition from and with the active co-operation of the sector. The sector can see itself as a participant rather than as a disparate collection of passively regulated individuals. Landlords can have a stake in their own development and in improving the sector both in a given area and across a Borough as a whole.

Since the inception of the Home Safe Scheme in the Hexthorpe area of Doncaster there has been a phenomenal increase in the levels of engagement from the area’s private sector landlords (which can be evidenced both by Home Safe and DMBC) and Managing Agents. For example, we can show that every landlord who is a member of Home Safe has a property or properties that have all the relevant up to date valid certifications or are having works carried out in order to provide these. All Managing Agents nominated by Home Safe landlords to manage properties in the scheme area have provided

evidence of their Fit & Proper Person status and are members of an approved Redress Scheme. This has freed the Council to focus on pursuing those landlords who have shown no interest in engaging or complying with the Scheme and enabled them to commence prosecution cases against those landlords within 9 months of the scheme going live.

With regard to property inspections we create a compliance baseline, from the very beginning, of all stock within a scheme area by deploying our team of HHSRS inspectors to inspect all scheme properties. Following that, members are offered training in order for them to facilitate their own inspection regime (with oversight by the Council and Home Safe built in). It's worth noting that in the Hexthorpe area all accessible properties were inspected within 6 weeks of the inspection phase beginning and we see landlords actively engaging with the scheme.

Thus, we believe that a similar scheme to that in place in Doncaster and Gainsborough would be of great benefit to the residents (generally) and landlords (both private and public sector) in Brent as well as to the Council.

Home Safe's alternative scheme will enable Brent Council to use their existing powers and resources more effectively and in a more targeted manner allowing them to focus those resources directly against the willingly bad, un-cooperative and non-complying landlords.

We would, therefore, welcome the opportunity to discuss working with the Brent Council in developing a "Co-regulation" scheme for the relevant remaining wards in the Borough and believe that we can garner the support of local landlords in so doing.

If it is of interest, we would be more than happy to arrange a series of meetings and/or workshops in order to explore how the Home Safe scheme can be tailored specifically for Brent.

16th December 2016



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Mr Tony Jemmott

London Borough of Brent
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Dear Mr Jemmott

Brent Selective Licensing Extension – Consultation Response

Thank you for the opportunity to respond to the above consultation.

The RLA also believes that the Council is premature on bringing forward proposals. The Housing and Planning Act 2016 will give local authorities substantial new powers to tackle breaches of housing legislation and drive the criminal operators from the sector. The council should wait until the impact of these new powers can be assessed before pressing on with more regulation in the form of selective licensing.

The RLA is opposed to the scheme and has a number of general objections to Licensing, which are attached as an appendix to this letter. Licensing schemes rarely meet their objectives. Good landlords will apply for licences and, in all likelihood, pass the cost on to tenants in the form of

increased rents, doing nothing to address affordability, while the worst landlords – the criminal operators – will simply ignore the scheme, as they do many other regulations.

There is little evidence that licensing schemes improve housing standards. The focus of staff becomes the processing and issue of licences, while prosecutions centre on whether a property is licensed or not, rather than management standards and property conditions.

The Council already has the necessary tools to tackle poor housing management and conditions in the PRS. Rather than introduce a bureaucratic licensing scheme that will see staff time wasted processing applications, it should continue to direct its limited resources at effective enforcement activity.

Landlords, will become risk averse in terms of the tenants they let to. Tenant problems such as anti-social behaviour are impossible for the landlord to address alone and landlords will not wish to risk a breach of licensing conditions that may affect their ability to let properties elsewhere. Some may seek to evict already challenging tenants. This could mean additional costs to other council services, as they pick up the pieces created by the disruption to the lives of already vulnerable tenants.

Likewise, if licensing costs are passed on to tenants in the form of rent increases, then some tenants may struggle, particularly those on benefits, affected by welfare reform and frozen housing allowances.

The RLA does not believe Brent has made a robust case for borough-wide licensing. By the consultation paper's own admission, 'much of the private rented sector offers good accommodation for people who want to live in the Borough'. It is invidious that the majority of landlords, who provide good accommodation, should face increased costs through fees, whilst the criminal operators ignore licensing. Poor and unsafe accommodation should be tackled through better and targeted enforcement.

The data maps showing the concentration of PRS housing suggest a number of wards should not be included: Dollis Hill; Kenton; Northwick Park; Queensbury; and Stonebridge. Even excluding these wards the scheme will require the consent of the Secretary of State.

Much of the Brent case relies on tackling anti-social behaviour. There are limits to what landlords can do to tackle ASB caused by tenants. The council already uses local joint action groups and cross-departmental and multi-agency working such as this is more effective in tackling ASB, maintaining tenancies, housing condition and management standards.

In fact, the report concedes that ASB is falling across the Borough. However, the highest incidences of ASB in Brent are to be found in wards where selective licensing has been in operation for almost two years. This suggests that selective licensing is failing to deliver the desired outcome.

Likewise, the report highlights Newham as an example of successful borough-wide licensing. However, in terms of illegal dumping of rubbish – a key concern – Newham has the highest incidence (and cost) of any London borough, again suggesting that selective licensing is failing to meet this objective.

The Council also admits that the current borough-wide additional licensing of HMOs is failing. The report acknowledges that “the large number of HMOs whose owners have neglected to apply for licences”. If the council cannot adequately enforce a borough-wide additional licensing scheme, then there must be doubt about its ability to enforce a borough-wide selective scheme encompassing tens of thousands more properties.

The council also committed to review the current selective licensing schemes annually. However, the assessment of these schemes do not form part of the consultation. The only data provided relates to the number of landlords who have applied for licence. The success of selective licensing cannot and should not be measured by how many properties are licensed. Instead, clear objectives and outcomes should be set at the start of the scheme regarding improved management standards, property conditions and, for example, reduction in ASB. Where is the evidence that the current selective licensing scheme is delivering these outcomes? Instead, as noted earlier, the highest incidences of ASB in the Borough are to be found in these wards.

Looking at the specifics of the scheme, should the council decide to proceed, we welcome the consideration of discounted fees. However, we believe the discount for accredited landlords does not provide sufficient incentive for landlords to become accredited. A more substantial discount would attract greater uptake of accreditation.

There is no mention of an alternative to online application. The RLA believes a paper registration option should be available.

With regard to the licensing conditions, the scheme appears to require landlords to force tenants to disclose unspent convictions (6a). This can only be done through a CRB or similar check. Forcing a third party to require such a check – an enforced subject access request - in order to gain a tenancy is a criminal offence, under s56 of the Data Protection Act. This condition should be removed.

There are alternatives to licensing. The RLA supports a system of self-regulation for landlords whereby compliant landlords join a co-regulation scheme which deals with standards and complaints in the first instance, while those outside the scheme remain under the scope of local authority enforcement. More information can be supplied if required.

We also support the use of the council tax registration process to identify private rented properties and landlords. Unlike licensing, this does not require self-identification by landlords, making it harder for so-called rogues to operate under the radar.

Thank you for giving these concerns your attention.

Yours Sincerely

A handwritten signature in black ink, appearing to read "John Stewart". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

John Stewart

POLICY MANAGER

Appendix – RLA General Licensing Concerns

The RLA has several areas of concern in regards to selective licensing, namely:

- i. Worrying trends are emerging in the case of discretionary licensing. Licensing entails a huge bureaucracy and much time, effort and expense is taken up in setting up and administering these schemes; rather than spending it on the ground and flushing out criminal landlords.
 - ii. Increasingly, discretionary licensing is being misused to fund cash strapped housing enforcement services. The recent Westminster sex shop Court of Appeal (*Hemming (t/a Simply Pleasure) Limited v Westminster City Council*) has brought such funding into question).
 - iii. Discretionary licensing is not being used for its intended purpose of a short period of intensive care; rather it is being used by the back door to regulate the PRS.
 - iv. The level of fees which are ultimately passed on to tenants to pay is a major worry so far as it affects landlords.
 - v. Despite high fee levels local authorities still lack the will and resources to properly implement licensing.
 - vi. Little has been done to improve property management. Opportunities to require training have been ignored. As always it has become an obsession with regard to physical standards with very detailed conditions being laid down. No action is taken against criminal landlords.
 - vii. We believe that a significant number of landlords are still operating under the radar without being licensed.
 - viii. As always it is the compliant landlord who is affected by the schemes. They pay the high fees involved but do not need regulation of this kind.
 - ix. Licensing is not being used alongside regeneration or improvement of the relevant areas. Insufficient resources are being employed to improve the areas.
 - x. Where areas are designated for selective licensing this highlights that they can be “sink” areas. This could well mean it would be harder to obtain a mortgage to buy a property in these areas.
 - xi. Schemes are not laying down clear objectives to enable decisions to be made whether or not these have been achieved. Proper monitoring is not being put into place to see if schemes are successful or not.
 - xii. There is little use of “fit and proper person” powers to exclude bad landlords.
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Appendix E – Topline Results Tables

Residents, Tenants and Businesses

Q1 - Which of the following best describes you?			
	% Total	% Answer	Count
Number of Responses	99.30%	-	849
Private tenant living in a single family dwelling (for example, a self-contained flat or house)	20.23%	20.38%	173
Private tenant living in a House in Multiple Occupation (HMO) or bedsit where you share some basic amenities (for example, toilet, bathroom, kitchen) with others	6.32%	6.36%	54
Local authority (Brent Housing Partnership) tenant	2.34%	2.36%	20
Housing association tenant	3.04%	3.06%	26
Owner occupier – either owning outright or buying with a mortgage	60.58%	61.01%	518
Shared owner – with a share in the equity of the home	2.57%	2.59%	22
Local business in Brent (but not a landlord, for whom there is a separate questionnaire)	0.23%	0.24%	2
Other interested party	3.98%	4.00%	34
No Response	0.70%	-	6
Total	100.00%	100.00%	855
Q1 - Other interested parties, please give details:			
	% Total	Count	
Number of Responses	3.51%	30	
Responses	3.51%	30	
No Response	96.49%	825	
Total	100.00%	855	
Q2 - How would you rate the following problems in your local area?			
Q2 - Nuisance neighbours (including intimidation and harassment and street drinking)			
	% Total	% Answer	Count
Number of Responses	96.26%	-	823

Very serious problem	15.67%	16.28%	134
Serious problem	17.66%	18.35%	151
Minor problem	29.01%	30.13%	248
Not a problem	33.92%	35.24%	290
No Response	3.74%	-	32
Total	100.00%	100.00%	855
Q2 - Noise nuisance			
	% Total	% Answer	Count
Number of Responses	95.32%	-	815
Very serious problem	14.74%	15.46%	126
Serious problem	15.79%	16.56%	135
Minor problem	34.39%	36.07%	294
Not a problem	30.41%	31.90%	260
No Response	4.68%	-	40
Total	100.00%	100.00%	855

Q2 - Drug use/drug dealing			
	% Total	% Answer	Count
Number of Responses	93.92%	-	803
Very serious problem	11.81%	12.58%	101
Serious problem	15.20%	16.19%	130
Minor problem	28.07%	29.89%	240
Not a problem	38.83%	41.34%	332
No Response	6.08%	-	52
Total	100.00%	100.00%	855

Q2 - General street scene (including graffiti and excessive 'to let'/'for sale' boards)			
	% Total	% Answer	Count
Number of Responses	94.74%	-	810

Very serious problem	12.51%	13.21%	107
Serious problem	15.20%	16.05%	130
Minor problem	33.10%	34.94%	283
Not a problem	33.92%	35.80%	290
No Response	5.26%	-	45
Total	100.00%	100.00%	855

Q2 - Rubbish dumping and fly tipping			
	% Total	% Answer	Count
Number of Responses	98.01%	-	838
Very serious problem	39.18%	39.98%	335
Serious problem	23.51%	23.99%	201
Minor problem	21.64%	22.08%	185
Not a problem	13.68%	13.96%	117
No Response	1.99%	-	17
Total	100.00%	100.00%	855

Q2 - High levels of overcrowded properties			
	% Total	% Answer	Count
Number of Responses	96.84%	-	828
Very serious problem	26.67%	27.54%	228
Serious problem	20.00%	20.65%	171
Minor problem	19.88%	20.53%	170
Not a problem	30.29%	31.28%	259
No Response	3.16%	-	27
Total	100.00%	100.00%	855

Q2 - Untidy front gardens			
	% Total	% Answer	Count
Number of Responses	96.96%	-	829
Very serious problem	25.85%	26.66%	221
Serious problem	16.73%	17.25%	143
Minor problem	28.42%	29.31%	243
Not a problem	25.96%	26.78%	222
No Response	3.04%	-	26
Total	100.00%	100.00%	855

Q2 - Poorly managed and maintained homes			
	% Total	% Answer	Count
Number of Responses	96.02%	-	821
Very serious problem	26.55%	27.65%	227
Serious problem	17.66%	18.39%	151
Minor problem	27.25%	28.38%	233
Not a problem	24.56%	25.58%	210
No Response	3.98%	-	34
Total	100.00%	100.00%	855

Q2 - High turnover of residents in the local community			
	% Total	% Answer	Count
Number of Responses	96.37%	-	824
Very serious problem	20.70%	21.48%	177
Serious problem	19.77%	20.51%	169
Minor problem	23.74%	24.64%	203
Not a problem	32.16%	33.37%	275
No Response	3.63%	-	31

Total	100.00%	100.00%	855
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Q2 - Street prostitution and brothels			
	% Total	% Answer	Count
Number of Responses	94.04%	-	804
Very serious problem	7.37%	7.84%	63
Serious problem	5.96%	6.34%	51
Minor problem	14.74%	15.67%	126
Not a problem	65.96%	70.15%	564
No Response	5.96%	-	51
Total	100.00%	100.00%	855

Q2 - High rent levels			
	% Total	% Answer	Count
Number of Responses	92.98%	-	795
Very serious problem	25.85%	27.80%	221
Serious problem	19.88%	21.38%	170
Minor problem	20.58%	22.14%	176
Not a problem	26.67%	28.68%	228
No Response	7.02%	-	60
Total	100.00%	100.00%	855

Q2 - Lack of community engagement			
	% Total	% Answer	Count
Number of Responses	94.97%	-	812
Very serious problem	22.22%	23.40%	190
Serious problem	23.63%	24.88%	202
Minor problem	26.08%	27.46%	223
Not a problem	23.04%	24.26%	197
No Response	5.03%	-	43
Total	100.00%	100.00%	855

Q2 - Empty/boarded up properties			
	% Total	% Answer	Count
Number of Responses	93.57%	-	800
Very serious problem	6.55%	7.00%	56
Serious problem	6.08%	6.50%	52
Minor problem	25.03%	26.75%	214
Not a problem	55.91%	59.75%	478
No Response	6.43%	-	55

Total	100.00%	100.00%	855
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Q2 - Levels of migration			
	% Total	% Answer	Count
Number of Responses	95.56%	-	817
Very serious problem	22.92%	23.99%	196
Serious problem	13.57%	14.20%	116
Minor problem	24.44%	25.58%	209
Not a problem	34.62%	36.23%	296
No Response	4.44%	-	38
Total	100.00%	100.00%	855

Q2 - Tenants sub-letting			
	% Total	% Answer	Count
Number of Responses	93.80%	-	802
Very serious problem	17.89%	19.08%	153
Serious problem	16.49%	17.58%	141
Minor problem	23.63%	25.19%	202
Not a problem	35.79%	38.15%	306
No Response	6.20%	-	53
Total	100.00%	100.00%	855

Q2 - Tenants being aware of their legal responsibilities			
	% Total	% Answer	Count
Number of Responses	92.63%	-	792
Very serious problem	23.04%	24.87%	197
Serious problem	19.06%	20.58%	163
Minor problem	20.00%	21.59%	171
Not a problem	30.53%	32.95%	261
No Response	7.37%	-	63
Total	100.00%	100.00%	855

Q2 - Police reported crime in Brent e.g. burglary			
	% Total	% Answer	Count
Number of Responses	92.98%	-	795
Very serious problem	15.91%	17.11%	136
Serious problem	23.74%	25.53%	203
Minor problem	29.59%	31.82%	253
Not a problem	23.74%	25.53%	203
No Response	7.02%	-	60

Total	100.00%	100.00%	855
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Q2 - If other, please specify:		
	% Total	Count
Number of Responses	16.26%	139
Responses	16.26%	139
No Response	83.74%	716
Total	100.00%	855

Q3 - Thinking about the private rented sector as a whole in Brent, to what extent do you agree or disagree with the following statements?			
Q3 - Poorly maintained properties are contributing to the decline of my local area			
	% Total	% Answer	Count
Number of Responses	98.25%	-	840
I agree strongly	42.11%	42.86%	360
I tend to agree	22.92%	23.33%	196
Neither agree nor disagree	13.68%	13.93%	117
I tend to disagree	10.18%	10.36%	87
I disagree strongly	9.36%	9.52%	80
No Response	1.75%	-	15
Total	100.00%	100.00%	855

Q3 - Poorly managed privately let properties are contributing to the decline of my local area			
	% Total	% Answer	Count
Number of Responses	97.78%	-	836
I agree strongly	46.32%	47.37%	396
I tend to agree	20.58%	21.05%	176
Neither agree nor disagree	12.28%	12.56%	105
I tend to disagree	8.65%	8.85%	74
I disagree strongly	9.94%	10.17%	85
No Response	2.22%	-	19
Total	100.00%	100.00%	855

Q3 - Landlords have a responsibility to manage their properties effectively			
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	% Total	% Answer	Count
Number of Responses	98.83%	-	845
I agree strongly	73.80%	74.67%	631
I tend to agree	16.02%	16.21%	137
Neither agree nor disagree	4.91%	4.97%	42
I tend to disagree	1.99%	2.01%	17
I disagree strongly	2.11%	2.13%	18
No Response	1.17%	-	10
Total	100.00%	100.00%	855

Q3 - Landlords should be 'fit and proper' persons, so that privately let properties in the borough are well managed			
	% Total	% Answer	Count
Number of Responses	99.06%	-	847
I agree strongly	70.99%	71.66%	607
I tend to agree	13.33%	13.46%	114
Neither agree nor disagree	8.77%	8.85%	75
I tend to disagree	2.34%	2.36%	20
I disagree strongly	3.63%	3.66%	31
No Response	0.94%	-	8
Total	100.00%	100.00%	855

Q4 - Thinking about how the private rented sector as a whole in Brent might be improved, to what extent do you agree or disagree with the following statements?

Q4 - Brent Council should intervene in areas suffering from high levels of anti-social behaviour			
	% Total	% Answer	Count
Number of Responses	98.48%	-	842
I agree strongly	67.60%	68.65%	578
I tend to agree	21.29%	21.62%	182
Neither agree nor disagree	3.86%	3.92%	33
I tend to disagree	1.87%	1.90%	16
I disagree strongly	3.86%	3.92%	33
No Response	1.52%	-	13
Total	100.00%	100.00%	855

Q4 - Brent Council should have more control over the way private landlords manage their properties			
	% Total	% Answer	Count
Number of Responses	98.36%	-	841

I agree strongly	59.30%	60.29%	507
I tend to agree	12.87%	13.08%	110
Neither agree nor disagree	6.43%	6.54%	55
I tend to disagree	7.72%	7.85%	66
I disagree strongly	12.05%	12.25%	103
No Response	1.64%	-	14
Total	100.00%	100.00%	855
Q4 - Licensing of the privately rented sector will help to reduce anti-social behaviour in the borough			
	% Total	% Answer	Count
Number of Responses	97.78%	-	836
I agree strongly	49.82%	50.96%	426
I tend to agree	16.96%	17.34%	145
Neither agree nor disagree	9.24%	9.45%	79
I tend to disagree	5.85%	5.98%	50
I disagree strongly	15.91%	16.27%	136
No Response	2.22%	-	19
Total	100.00%	100.00%	855

Q4 - Licensing of the privately rented sector will ensure that properties in poor condition are properly managed to prevent further deterioration			
	% Total	% Answer	Count
Number of Responses	98.25%	-	840
I agree strongly	59.06%	60.12%	505
I tend to agree	14.85%	15.12%	127
Neither agree nor disagree	5.38%	5.48%	46
I tend to disagree	5.85%	5.95%	50
I disagree strongly	13.10%	13.33%	112
No Response	1.75%	-	15

Total	100.00%	100.00%	855
Q4 - Licensing of the privately rented sector will ensure that people who occupy properties do not live in poorly managed housing or unacceptable conditions			
	% Total	% Answer	Count
Number of Responses	98.25%	-	840
I agree strongly	59.88%	60.95%	512
I tend to agree	14.85%	15.12%	127
Neither agree nor disagree	5.50%	5.60%	47
I tend to disagree	6.20%	6.31%	53
I disagree strongly	11.81%	12.02%	101
No Response	1.75%	-	15
Total	100.00%	100.00%	855

Q4 Licensing of the privately rented sector will help to preserve and improve the social and economic status of the local area			
	% Total	% Answer	Count
Number of Responses	98.25%	-	840
I agree strongly	52.75%	53.69%	451
I tend to agree	17.89%	18.21%	153
Neither agree nor disagree	7.25%	7.38%	62
I tend to disagree	4.80%	4.88%	41
I disagree strongly	15.56%	15.83%	133
No Response	1.75%	-	15
Total	100.00%	100.00%	855
Q4 - Licensing of the privately rented sector will reduce the impact of criminal activity on residents and businesses in Brent			
	% Total	% Answer	Count
Number of Responses	97.54%	-	834
I agree strongly	45.73%	46.88%	391
I tend to agree	16.14%	16.55%	138

Neither agree nor disagree	14.04%	14.39%	120
I tend to disagree	6.32%	6.47%	54
I disagree strongly	15.32%	15.71%	131
No Response	2.46%	-	21
Total	100.00%	100.00%	855

Q5 - To what extent do you agree or disagree that private landlords should take the following actions?			
Q5 - Keep their properties in good condition			
	% Total	% Answer	Count
Number of Responses	98.13%	-	839
Strongly agree	75.56%	77.00%	646
Agree	18.13%	18.47%	155
Neither agree or disagree	3.04%	3.10%	26
Disagree	0.35%	0.36%	3
Disagree strongly	1.05%	1.07%	9
No Response	1.87%	-	16
Total	100.00%	100.00%	855

Q5 - Obtain references for new tenants wishing to move in			
	% Total	% Answer	Count
Number of Responses	97.89%	-	837
Strongly agree	60.35%	61.65%	516
Agree	23.98%	24.49%	205
Neither agree or disagree	10.53%	10.75%	90
Disagree	1.52%	1.55%	13
Disagree strongly	1.52%	1.55%	13
No Response	2.11%	-	18

Total	100.00%	100.00%	855
Q5 - Ensure tenants know anti-social behaviour is unacceptable and act to address it			
	% Total	% Answer	Count
Number of Responses	97.43%	-	833
Strongly agree	68.77%	70.59%	588
Agree	18.95%	19.45%	162
Neither agree or disagree	5.61%	5.76%	48
Disagree	1.87%	1.92%	16
Disagree strongly	2.22%	2.28%	19
No Response	2.57%	-	22
Total	100.00%	100.00%	855
Q5 - Provide tenants with the landlord's contact details			
	% Total	% Answer	Count
Number of Responses	98.01%	-	838
Strongly agree	74.39%	75.89%	636
Agree	18.60%	18.97%	159
Neither agree or disagree	3.27%	3.34%	28
Disagree	0.82%	0.84%	7
Disagree strongly	0.94%	0.95%	8
No Response	1.99%	-	17
Total	100.00%	100.00%	855

Q6 - Please rate the following problems in relation to your own home or where you live in Brent.			
Q6 - Poor amenities (e.g. toilet, bathroom, kitchen facilities, storage etc.)			
	% Total	% Answer	Count
Number of Responses	94.04%	-	804
Very serious problem	11.35%	12.06%	97

Serious problem	6.32%	6.72%	54
Minor problem	6.90%	7.34%	59
Not a problem	59.53%	63.31%	509
Don't know	9.94%	10.57%	85
No Response	5.96%	-	51
Total	100.00%	100.00%	855

Q6 - Poor fire safety (e.g. means of escape, fire doors, extinguishers etc.)			
	% Total	% Answer	Count
Number of Responses	93.45%	-	799
Very serious problem	10.99%	11.76%	94
Serious problem	6.20%	6.63%	53
Minor problem	7.60%	8.14%	65
Not a problem	58.13%	62.20%	497
Don't know	10.53%	11.26%	90
No Response	6.55%	-	56
Total	100.00%	100.00%	855

Q6 - Property in a poor state of repair			
	% Total	% Answer	Count
Number of Responses	93.68%	-	801
Very serious problem	15.09%	16.10%	129
Serious problem	10.53%	11.24%	90
Minor problem	13.10%	13.98%	112
Not a problem	51.23%	54.68%	438
Don't know	3.74%	4.00%	32
No Response	6.32%	-	54

Total	100.00%	100.00%	855
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Q6 - Poor management of internal common parts			
	% Total	% Answer	Count
Number of Responses	93.45%	-	799
Very serious problem	12.16%	13.02%	104
Serious problem	7.49%	8.01%	64
Minor problem	9.24%	9.89%	79
Not a problem	52.63%	56.32%	450
Don't know	11.93%	12.77%	102
No Response	6.55%	-	56
Total	100.00%	100.00%	855

Q6 - Too little space/too many people/ overcrowding			
	% Total	% Answer	Count
Number of Responses	92.98%	-	795
Very serious problem	17.31%	18.62%	148
Serious problem	7.95%	8.55%	68
Minor problem	9.12%	9.81%	78
Not a problem	54.04%	58.11%	462
Don't know	4.56%	4.91%	39
No Response	7.02%	-	60
Total	100.00%	100.00%	855

Q6 - Poor security			
	% Total	% Answer	Count
Number of Responses	92.51%	-	791
Very serious problem	13.22%	14.29%	113

Serious problem	9.59%	10.37%	82
Minor problem	14.85%	16.06%	127
Not a problem	46.32%	50.06%	396
Don't know	8.54%	9.23%	73
No Response	7.49%	-	64
Total	100.00%	100.00%	855

Q6 - Lack of energy efficiency in the property			
	% Total	% Answer	Count
Number of Responses	92.40%	-	790
Very serious problem	12.75%	13.80%	109
Serious problem	8.77%	9.49%	75
Minor problem	14.15%	15.32%	121
Not a problem	45.85%	49.62%	392
Don't know	10.88%	11.77%	93
No Response	7.60%	-	65
Total	100.00%	100.00%	855

Q6 - Damp and mould			
	% Total	% Answer	Count
Number of Responses	92.75%	-	793
Very serious problem	14.62%	15.76%	125
Serious problem	7.84%	8.45%	67
Minor problem	13.10%	14.12%	112
Not a problem	47.60%	51.32%	407
Don't know	9.59%	10.34%	82
No Response	7.25%	-	62
Total	100.00%	100.00%	855

Q6 - Poor noise insulation			
	% Total	% Answer	Count
Number of Responses	92.28%	-	789
Very serious problem	19.88%	21.55%	170
Serious problem	9.01%	9.76%	77
Minor problem	14.50%	15.72%	124
Not a problem	41.75%	45.25%	357
Don't know	7.13%	7.73%	61
No Response	7.72%	-	66
Total	100.00%	100.00%	855

Q6 - Personal safety and fear of crime			
	% Total	% Answer	Count
Number of Responses	92.98%	-	795
Very serious problem	16.84%	18.11%	144
Serious problem	13.80%	14.84%	118
Minor problem	20.47%	22.01%	175
Not a problem	37.89%	40.75%	324
Don't know	3.98%	4.28%	34
No Response	7.02%	-	60
Total	100.00%	100.00%	855

Q6 - Illegal extensions/conversions without planning permission			
	% Total	% Answer	Count
Number of Responses	92.75%	-	793
Very serious problem	16.96%	18.28%	145
Serious problem	7.95%	8.58%	68
Minor problem	11.35%	12.23%	97

Not a problem	44.56%	48.05%	381
Don't know	11.93%	12.86%	102
No Response	7.25%	-	62
Total	100.00%	100.00%	855

Q6 - Unkempt external appearance and lack of property maintenance			
	% Total	% Answer	Count
Number of Responses	93.33%	-	798
Very serious problem	21.52%	23.06%	184
Serious problem	11.23%	12.03%	96
Minor problem	15.67%	16.79%	134
Not a problem	42.46%	45.49%	363
Don't know	2.46%	2.63%	21
No Response	6.67%	-	57
Total	100.00%	100.00%	855

Q6 - Refuse problems including overgrown gardens with accumulations of rubbish and abandoned/dumped household items			
	% Total	% Answer	Count
Number of Responses	94.27%	-	806
Very serious problem	28.07%	29.78%	240
Serious problem	12.98%	13.77%	111
Minor problem	15.56%	16.50%	133
Not a problem	35.67%	37.84%	305
Don't know	1.99%	2.11%	17
No Response	5.73%	-	49
Total	100.00%	100.00%	855

Q6 - Pressure on car parking			
	% Total	% Answer	Count
Number of Responses	93.45%	-	799
Very serious problem	30.64%	32.79%	262
Serious problem	16.02%	17.15%	137
Minor problem	16.84%	18.02%	144
Not a problem	26.67%	28.54%	228
Don't know	3.27%	3.50%	28
No Response	6.55%	-	56
Total	100.00%	100.00%	855

Q6 - Noise and disturbance from neighbours who are private tenants			
	% Total	% Answer	Count
Number of Responses	93.10%	-	796
Very serious problem	19.18%	20.60%	164
Serious problem	11.35%	12.19%	97
Minor problem	19.06%	20.48%	163
Not a problem	39.65%	42.59%	339
Don't know	3.86%	4.15%	33
No Response	6.90%	-	59
Total	100.00%	100.00%	855

Q6 - Other anti-social behaviour by private tenants including drug taking/dealing and street drinking			
	% Total	% Answer	Count
Number of Responses	93.33%	-	798
Very serious problem	18.36%	19.67%	157
Serious problem	11.23%	12.03%	96
Minor problem	16.84%	18.05%	144

Not a problem	40.23%	43.11%	344
Don't know	6.67%	7.14%	57
No Response	6.67%	-	57
Total	100.00%	100.00%	855

Q6 - Harassment/discrimination			
	% Total	% Answer	Count
Number of Responses	92.63%	-	792
Very serious problem	12.63%	13.64%	108
Serious problem	6.43%	6.94%	55
Minor problem	11.11%	11.99%	95
Not a problem	51.23%	55.30%	438
Don't know	11.23%	12.12%	96
No Response	7.37%	-	63
Total	100.00%	100.00%	855
Q6 - Fear of eviction			
	% Total	% Answer	Count
Number of Responses	92.16%	-	788
Very serious problem	9.59%	10.41%	82
Serious problem	4.68%	5.08%	40
Minor problem	6.43%	6.98%	55
Not a problem	50.88%	55.20%	435
Don't know	20.58%	22.34%	176
No Response	7.84%	-	67
Total	100.00%	100.00%	855
Q6 - Insecure tenancy/no tenancy agreement			
	% Total	% Answer	Count
Number of Responses	91.93%	-	786

Very serious problem	13.10%	14.25%	112
Serious problem	5.15%	5.60%	44
Minor problem	5.26%	5.73%	45
Not a problem	48.30%	52.54%	413
Don't know	20.12%	21.88%	172
No Response	8.07%	-	69
Total	100.00%	100.00%	855

Q6 - Other problems, please specify:			
	% Total	Count	
Number of Responses	15.79%	135	
Responses	15.79%	135	
No Response	84.21%	720	
Total	100.00%	855	

Q7 To what extent do you agree or disagree that the proposed selective licensing conditions above are reasonable?			
	% Total	% Answer	Count
Number of Responses	94.15%	-	805
I agree strongly	61.52%	65.34%	526
I tend to agree	14.04%	14.91%	120
Neither agree nor disagree	3.16%	3.35%	27
I tend to disagree	5.26%	5.59%	45
I disagree strongly	10.18%	10.81%	87
No Response	5.85%	-	50
Total	100.00%	100.00%	855

Q7 - If you 'tend to disagree' or 'disagree strongly' with the proposed selective licensing conditions, please tell us why:		
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	% Total	Count
Number of Responses	20.35%	174
Responses	20.35%	174
No Response	79.65%	681
Total	100.00%	855

Q8 - In your opinion, should the council extend selective licensing for single family dwellings (for example self-contained flats or houses) in Brent?			
	% Total	% Answer	Count
Number of Responses	98.25%	-	840
Yes, borough-wide	68.19%	69.40%	583
Yes, but only where I own/let property	1.99%	2.02%	17
Yes, but elsewhere in Brent	1.29%	1.31%	11
No	21.40%	21.79%	183
Don't know	5.38%	5.48%	46
No Response	1.75%	-	15
Total	100.00%	100.00%	855

Q8 - Please state area(s):		
	% Total	Count
Number of Responses	0.70%	6
Responses	0.70%	6
No Response	99.30%	849
Total	100.00%	855

Q8 - Elsewhere in Brent, please specify:		
	% Total	Count
Number of Responses	0.70%	6
Responses	0.70%	6

No Response	99.30%	849
Total	100.00%	855

Q9 - In your opinion, would introducing Selective Licensing achieve any of the following? (tick all that apply)				
	% Total	% Answer	% Frequency	Count
Number of Responses	81.52%	-	-	697
Shift the reliance away from using resident complaints to identify problems	8.60%	8.88%	49.59%	424
Promote a professional management ethos amongst private landlords	10.64%	11.00%	61.40%	525
Provide tenants with consistent information on acceptable standards of accommodation	10.64%	11.00%	61.40%	525
Allow the council to take action against landlords who provide poor standards of accommodation	11.84%	12.23%	68.30%	584
Remove rogue landlords from the sector	11.78%	12.17%	67.95%	581
Reduce anti-social behaviour in the borough	9.21%	9.51%	53.10%	454
Provide safe homes for tenants to live in	11.68%	12.07%	67.37%	576
Provide a better approach to managing the private rented sector	10.52%	10.87%	60.70%	519
Allow the council to take action against landlords whose tenants cause persistent anti-social behaviour	11.11%	11.48%	64.09%	548
Allow the council to take action against landlords who provide poor standard of accommodation	0.39%	0.40%	2.22%	19
Reduce level of anti-social behaviour in the borough	0.39%	0.40%	2.22%	19
No Response	3.20%	-	18.48%	158
Total	100.00%	100.00%	-	4,932

Postcode - please tell us your postcode:		
	% Total	Count
Number of Responses	88.89%	760
Responses	88.89%	760
No Response	11.11%	95
Total	100.00%	855

Q10 - How long have you lived in Brent?			
	% Total	% Answer	Count
Number of Responses	97.78%	-	836
Less than one year	2.92%	2.99%	25
One to two years	4.09%	4.19%	35
Two to five years	8.65%	8.85%	74
Five to ten years	11.93%	12.20%	102
More than ten years	66.20%	67.70%	566
Prefer not to say	3.98%	4.07%	34
No Response	2.22%	-	19
Total	100.00%	100.00%	855

Q11 - How long have you lived in your current property?			
	% Total	% Answer	Count
Number of Responses	97.43%	-	833
Less than one year	4.68%	4.80%	40
One to two years	7.13%	7.32%	61
Two to five years	14.74%	15.13%	126
Five to ten years	13.45%	13.81%	115
More than ten years	52.87%	54.26%	452
Prefer not to say	4.56%	4.68%	39
No Response	2.57%	-	22
Total	100.00%	100.00%	855

Q12 - Are you:			
	% Total	% Answer	Count
Number of Responses	97.31%	-	832
Male	47.25%	48.56%	404
Female	41.75%	42.91%	357
Prefer not to say	8.30%	8.53%	71
No Response	2.69%	-	23
Total	100.00%	100.00%	855

Q13 - What is your age group?			
	% Total	% Answer	Count
Number of Responses	98.25%	-	840
Under 18	0.00%	0.00%	0
18 - 24	1.75%	1.79%	15
25 - 34	14.04%	14.29%	120
35 - 44	19.18%	19.52%	164

45 - 54	20.58%	20.95%	176
55 - 60	9.82%	10.00%	84
61+	23.27%	23.69%	199
Prefer not to say	9.59%	9.76%	82
No Response	1.75%	-	15
Total	100.00%	100.00%	855

Q14 - Do you have any long-standing illness, disability or infirmity? (Long-standing means anything that has troubled you over a period of time or that is likely to affect you over a period of time)			
	% Total	% Answer	Count
Number of Responses	96.37%	-	824
Yes	13.10%	13.59%	112
No	69.71%	72.33%	596
Prefer not to say	13.57%	14.08%	116
[No Response]	3.63%	-	31
Total	100.00%	100.00%	855

Q15 - How would you describe your ethnic background?			
	% Total	% Answer	Count
Number of Responses	98.25%	-	840
White: English/Welsh/Scottish/Northern Irish/British	30.41%	30.95%	260
White: Irish	3.86%	3.93%	33
White: Gypsy or Irish Traveller	0.00%	0.00%	0
Any other White background	9.36%	9.52%	80
White and Black Caribbean	0.58%	0.60%	5
White and Black African	0.47%	0.48%	4

White and Asian	1.29%	1.31%	11
African: Black/African/Caribbean/Black British	2.34%	2.38%	20
Caribbean: Black/African/Caribbean/Black British	4.09%	4.17%	35
Any other Black/African/Caribbean background	0.23%	0.24%	2
Chinese: Asian/Asian British	1.52%	1.55%	13
Bangladeshi: Asian/Asian British	0.58%	0.60%	5
Pakistani: Asian/Asian British	1.40%	1.43%	12
Indian: Asian/Asian British	13.92%	14.17%	119
Any other Asian background	2.34%	2.38%	20
Arab	1.52%	1.55%	13
Any other mixed/multiple ethnic background	1.17%	1.19%	10
Any other ethnic group	1.52%	1.55%	13
Prefer not to say	21.64%	22.02%	185
No Response	1.75%	-	15
Total	100.00%	100.00%	855

Q16 - What is your religion or belief?			
	% Total	% Answer	Count
Number of Responses	97.43%	-	833
Buddhist	1.40%	1.44%	12
Christian	30.88%	31.69%	264
Hindu	9.24%	9.48%	79
Jewish	1.75%	1.80%	15
Muslim	6.43%	6.60%	55
Sikh	0.94%	0.96%	8
None	17.08%	17.53%	146
Prefer not to say	26.67%	27.37%	228
Other	3.04%	3.12%	26

No Response	2.57%	-	22
Total	100.00%	100.00%	855

Q16 - If other, please specify:		
	% Total	Count
Number of Responses	1.29%	11
Responses	1.29%	11
No Response	98.71%	844
Total	100.00%	855

Q17 - What is your sexual orientation?			
	% Total	% Answer	Count
Number of Responses	96.14%	-	822
Heterosexual/straight	65.38%	68.00%	559
Lesbian	0.35%	0.36%	3
Gay man	1.87%	1.95%	16
Bisexual	0.23%	0.24%	2
Prefer not to say	28.30%	29.44%	242
No Response	3.86%	-	33
Total	100.00%	100.00%	855

Q18 - How did you hear about this consultation?				
	% Total	% Answer	% Frequency	Count
Number of Responses	97.89%	-	-	837
Leaflet	41.98%	42.83%	45.03%	385
Poster	8.18%	8.34%	8.77%	75
Email	9.81%	10.01%	10.53%	90
Brent website	11.67%	11.90%	12.51%	107
Brent Connects	2.07%	2.11%	2.22%	19
Brent Citizens' Panel	0.87%	0.89%	0.94%	8
Local newspaper	1.53%	1.56%	1.64%	14

Word of mouth	6.32%	6.45%	6.78%	58
Other	15.59%	15.91%	16.73%	143
No Response	1.96%	-	2.11%	18
Total	100.00%	100.00%	-	917

Q18 - If other, please specify:		
	% Total	Count
Number of Responses	13.33%	114
Responses	13.33%	114
No Response	86.67%	741
Total	100.00%	855

Landlords and Managing Agents

Section 1: About You

Q1: Which of the following best describes you?			
	% Total	% Answer	Count
Number of Responses	99.51%	-	204
Landlord who manages their own property	67.32%	67.65%	138
Landlord who uses a managing agent	16.59%	16.67%	34
Letting agent	5.37%	5.39%	11
Managing agent	5.85%	5.88%	12
Registered social landlord	0.98%	0.98%	2
Other interested party	3.41%	3.43%	7
No Response	0.49%	-	1
Total	100.00%	100.00%	205

Q1a: If other, please give details		
	% Total	Count
Number of Responses	0.98%	2
Responses	0.98%	2
No Response	99.02%	203
Total	100.00%	205

Q2: Type/number of properties owned/managed in Brent:			
	% Total	% Answer	Count
Single occupancy house			
Number of Responses	60.00%	-	123
1 to 5	49.76%	82.93%	102

6 to 10	3.41%	5.69%	7
11 to 20	1.46%	2.44%	3
21 to 50	2.44%	4.07%	5
51 to 100	1.46%	2.44%	3
100+	1.46%	2.44%	3
No Response	40.00%	-	82
Total	100.00%	100.00%	205

Self-contained flat			
	% Total	% Answer	Count
Number of Responses	50.24%	-	103
1 to 5	36.59%	72.82%	75
6 to 10	3.90%	7.77%	8
11 to 20	4.39%	8.74%	9
21 to 50	1.95%	3.88%	4
51 to 100	0.49%	0.97%	1
100+	2.93%	5.83%	6
No Response	49.76%	-	102
Total	100.00%	100.00%	205

Houses in Multiple Occupation – smaller than three storeys			
	% Total	% Answer	Count
Number of Responses	22.44%	-	46
1 to 5	16.59%	73.91%	34
6 to 10	1.95%	8.70%	4
11 to 20	0.98%	4.35%	2
21 to 50	1.46%	6.52%	3
51 to 100	0.00%	0.00%	0

100+	1.46%	6.52%	3
No Response	77.56%	-	159
Total	100.00%	100.00%	205

Houses in Multiple Occupation – three storeys or more			
	% Total	% Answer	Count
Number of Responses	12.68%	-	26
1 to 5	9.27%	73.08%	19
6 to 10	1.46%	11.54%	3
11 to 20	1.46%	11.54%	3
21 to 50	0.00%	0.00%	0
51 to 100	0.49%	3.85%	1
100+	0.00%	0.00%	0
No Response	87.32%	-	179
Total	100.00%	100.00%	205

Q3: Are you a member of any of the following? Please tick all that apply				
	% Total	% Answer	% Frequency	Count
Number of Responses	44.39%	-	-	91
National Landlords Association (NLA)	18.75%	38.18%	20.49%	42
Residential Landlords Association (RLA)	12.95%	26.36%	14.15%	29
ARLA (Association of Residential Lettings Agents (ARLA))	7.59%	15.45%	8.29%	17
Other landlord or lettings agent association	9.82%	20.00%	10.73%	22
No Response	50.89%	-	55.61%	114
Total	100.00%	100.00%	-	224

Q3a: if other		
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	% Total	Count
Number of Responses	2.93%	6
Responses	2.93%	6
No Response	97.07%	199
Total	100.00%	205

Q4: Are you an accredited landlord or agent?			
	% Total	% Answer	Count
Number of Responses	98.05%	-	201
Yes	20.49%	20.90%	42
No	77.56%	79.10%	159
No Response	1.95%	-	4
Total	100.00%	100.00%	205

Q4a: If other, which scheme? E.g. UKLAS/ LLAS, NLA, RLA		
	% Total	Count
Number of Responses	18.05%	37
Responses	18.05%	37
No Response	81.95%	168
Total	100.00%	205

Section 2: Local Problems

Q5: As a landlord or agent in Brent, how would you rate the problems identified below?			
Poor quality private rented housing			
	% Total	% Answer	Count
Number of Responses	95.12%	-	195
Very serious problem	7.80%	8.21%	16
Serious problem	17.56%	18.46%	36
Minor problem	34.63%	36.41%	71
Not a problem	35.12%	36.92%	72
No Response	4.88%	-	10

Total	100.00%	100.00%	205
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Poorly managed privately rented houses (by others)			
	% Total	% Answer	Count
Number of Responses	94.15%	-	193
Very serious problem	8.29%	8.81%	17
Serious problem	23.41%	24.87%	48
Minor problem	35.61%	37.82%	73
Not a problem	26.83%	28.50%	55
No Response	5.85%	-	12
Total	100.00%	100.00%	205

Rubbish dumping and fly tipping			
	% Total	% Answer	Count
Number of Responses	97.56%	-	200
Very serious problem	25.85%	26.50%	53
Serious problem	21.95%	22.50%	45
Minor problem	30.24%	31.00%	62
Not a problem	19.51%	20.00%	40
No Response	2.44%	-	5
Total	100.00%	100.00%	205

Untidy front gardens			
	% Total	% Answer	Count
Number of Responses	96.59%	-	198
Very serious problem	11.71%	12.12%	24
Serious problem	19.51%	20.20%	40
Minor problem	35.61%	36.87%	73
Not a problem	29.76%	30.81%	61
No Response	3.41%	-	7
Total	100.00%	100.00%	205

Nuisance and anti-social behaviour by your tenants			
	% Total	% Answer	Count
Number of Responses	97.56%	-	200
Very serious problem	7.80%	8.00%	16
Serious problem	6.34%	6.50%	13
Minor problem	25.37%	26.00%	52
Not a problem	58.05%	59.50%	119
No Response	2.44%	-	5
Total	100.00%	100.00%	205

Street prostitution and brothels			
	% Total	% Answer	Count
Number of Responses	94.63%	-	194
Very serious problem	10.73%	11.34%	22
Serious problem	6.34%	6.70%	13
Minor problem	20.49%	21.65%	42
Not a problem	57.07%	60.31%	117
No Response	5.37%	-	11
Total	100.00%	100.00%	205

Difficulty finding tenants			
	% Total	% Answer	Count
Number of Responses	97.07%	-	199
Very serious problem	6.34%	6.53%	13
Serious problem	4.88%	5.03%	10
Minor problem	26.34%	27.14%	54
Not a problem	59.51%	61.31%	122
No Response	2.93%	-	6
Total	100.00%	100.00%	205

Empty properties affecting rental income			
	% Total	% Answer	Count
Number of Responses	96.59%	-	198
Very serious problem	5.37%	5.56%	11
Serious problem	9.27%	9.60%	19
Minor problem	25.85%	26.77%	53
Not a problem	56.10%	58.08%	115
No Response	3.41%	-	7
Total	100.00%	100.00%	205

High turnover of tenants			
	% Total	% Answer	Count
Number of Responses	97.56%	-	200
Very serious problem	6.34%	6.50%	13
Serious problem	9.27%	9.50%	19
Minor problem	20.98%	21.50%	43
Not a problem	60.98%	62.50%	125
No Response	2.44%	-	5
Total	100.00%	100.00%	205

Levels of migration			
	% Total	% Answer	Count
Number of Responses	95.12%	-	195
Very serious problem	10.73%	11.28%	22
Serious problem	12.20%	12.82%	25
Minor problem	23.90%	25.13%	49
Not a problem	48.29%	50.77%	99
No Response	4.88%	-	10
Total	100.00%	100.00%	205

Tenants sub-letting			
	% Total	% Answer	Count
Number of Responses	97.07%	-	199
Very serious problem	15.61%	16.08%	32
Serious problem	11.71%	12.06%	24
Minor problem	25.85%	26.63%	53
Not a problem	43.90%	45.23%	90
No Response	2.93%	-	6
Total	100.00%	100.00%	205

Tenants being aware of their legal responsibilities			
	% Total	% Answer	Count
Number of Responses	96.59%	-	198
Very serious problem	6.34%	6.57%	13
Serious problem	13.66%	14.14%	28
Minor problem	25.85%	26.77%	53
Not a problem	50.73%	52.53%	104
No Response	3.41%	-	7
Total	100.00%	100.00%	205

Police reported crime in Brent e.g. burglary			
	% Total	% Answer	Count
Number of Responses	94.63%	-	194
Very serious problem	10.73%	11.34%	22
Serious problem	15.61%	16.49%	32
Minor problem	34.63%	36.60%	71
Not a problem	33.66%	35.57%	69
No Response	5.37%	-	11
Total	100.00%	100.00%	205

Number of tenants claiming benefits			
	% Total	% Answer	Count
Number of Responses	94.63%	-	194
Very serious problem	12.68%	13.40%	26
Serious problem	16.10%	17.01%	33
Minor problem	29.76%	31.44%	61
Not a problem	36.10%	38.14%	74
No Response	5.37%	-	11
Total	100.00%	100.00%	205

Tenants leaving without paying rent/giving correct notice			
	% Total	% Answer	Count
Number of Responses	95.12%	-	195
Very serious problem	17.56%	18.46%	36
Serious problem	13.66%	14.36%	28
Minor problem	25.37%	26.67%	52
Not a problem	38.54%	40.51%	79
No Response	4.88%	-	10
Total	100.00%	100.00%	205

Tenants building up high levels of rent arrears			
	% Total	% Answer	Count
Number of Responses	96.10%	-	197
Very serious problem	15.12%	15.74%	31
Serious problem	13.66%	14.21%	28
Minor problem	28.29%	29.44%	58
Not a problem	39.02%	40.61%	80
No Response	3.90%	-	8
Total	100.00%	100.00%	205

Problems evicting tenants			
	% Total	% Answer	Count
Number of Responses	95.61%	-	196
Very serious problem	21.95%	22.96%	45
Serious problem	14.63%	15.31%	30
Minor problem	20.98%	21.94%	43
Not a problem	38.05%	39.80%	78
No Response	4.39%	-	9
Total	100.00%	100.00%	205

Lack of community engagement			
	% Total	% Answer	Count
Number of Responses	95.61%	-	196
Very serious problem	14.15%	14.80%	29
Serious problem	13.17%	13.78%	27
Minor problem	29.27%	30.61%	60
Not a problem	39.02%	40.82%	80
No Response	4.39%	-	9
Total	100.00%	100.00%	205

If other, please specify		
	% Total	Count
Number of Responses	15.61%	32
Responses	15.61%	32
No Response	84.39%	173
Total	100.00%	205

Q 6: Thinking about the private rented sector as a whole in Brent, to what extent do you agree or disagree with the following statements?

Poorly maintained properties are contributing to the decline of some areas in Brent			
	% Total	% Answer	Count
Number of Responses	97.56%	-	200
I agree strongly	17.07%	17.50%	35
I tend to agree	22.44%	23.00%	46
Neither agree nor disagree	20.98%	21.50%	43
I tend to disagree	18.54%	19.00%	38
I disagree strongly	18.54%	19.00%	38

No Response	2.44%	-	5
Total	100.00%	100.00%	205

Poorly managed, privately let properties are contributing to the decline of some areas in Brent			
	% Total	% Answer	Count
Number of Responses	98.05%	-	201
I agree strongly	14.63%	14.93%	30
I tend to agree	18.54%	18.91%	38
Neither agree nor disagree	24.88%	25.37%	51
I tend to disagree	20.00%	20.40%	41
I disagree strongly	20.00%	20.40%	41
No Response	1.95%	-	4
Total	100.00%	100.00%	205

Landlords have a responsibility to manage their properties effectively			
	% Total	% Answer	Count
Number of Responses	98.54%	-	202
I agree strongly	61.46%	62.38%	126
I tend to agree	28.78%	29.21%	59
Neither agree nor disagree	5.85%	5.94%	12
I tend to disagree	0.98%	0.99%	2
I disagree strongly	1.46%	1.49%	3
No Response	1.46%	-	3
Total	100.00%	100.00%	205

Landlords should be 'fit and proper' persons, so that privately let properties in the borough are well managed			
	% Total	% Answer	Count
Number of Responses	98.05%	-	201
I agree strongly	42.44%	43.28%	87
I tend to agree	27.80%	28.36%	57
Neither agree nor disagree	17.07%	17.41%	35
I tend to disagree	6.83%	6.97%	14
I disagree strongly	3.90%	3.98%	8
No Response	1.95%	-	4
Total	100.00%	100.00%	205

Section 3: Local Solutions

Q7: Thinking about how the private rented sector as a whole in Brent might be improved, to what extent do you agree or disagree with the following statements?

Brent Council should intervene in areas suffering from high levels of anti-social behaviour			
	% Total	% Answer	Count
Number of Responses	98.05%	-	201
I agree strongly	37.56%	38.31%	77
I tend to agree	36.10%	36.82%	74
Neither agree nor disagree	9.76%	9.95%	20
I tend to disagree	5.85%	5.97%	12
I disagree strongly	8.78%	8.96%	18
No Response	1.95%	-	4

Total	100.00%	100.00%	205
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Brent Council should have more control over the way private landlords manage their properties			
	% Total	% Answer	Count
Number of Responses	99.02%	-	203
I agree strongly	7.32%	7.39%	15
I tend to agree	12.20%	12.32%	25
Neither agree nor disagree	11.22%	11.33%	23
I tend to disagree	26.34%	26.60%	54
I disagree strongly	41.95%	42.36%	86
No Response	0.98%	-	2
Total	100.00%	100.00%	205

Licensing of the privately rented sector will help to reduce anti-social behaviour in the borough			
	% Total	% Answer	Count
Number of Responses	98.54%	-	202
I agree strongly	5.37%	5.45%	11
I tend to agree	8.78%	8.91%	18
Neither agree nor disagree	10.24%	10.40%	21
I tend to disagree	20.00%	20.30%	41
I disagree strongly	54.15%	54.95%	111
No Response	1.46%	-	3
Total	100.00%	100.00%	205

licensing of the privately rented sector will ensure that properties in poor condition are properly			
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managed to prevent further deterioration			
	% Total	% Answer	Count
Number of Responses	98.05%	-	201
I agree strongly	7.32%	7.46%	15
I tend to agree	13.66%	13.93%	28
Neither agree nor disagree	14.15%	14.43%	29
I tend to disagree	24.39%	24.88%	50
I disagree strongly	38.54%	39.30%	79
No Response	1.95%	-	4
Total	100.00%	100.00%	205

Licensing of the privately rented sector will ensure that people who occupy properties do not live in poorly managed housing or unacceptable conditions			
	% Total	% Answer	Count
Number of Responses	98.54%	-	202
I agree strongly	7.32%	7.43%	15
I tend to agree	16.59%	16.83%	34
Neither agree nor disagree	11.71%	11.88%	24
I tend to disagree	22.93%	23.27%	47
I disagree strongly	40.00%	40.59%	82
No Response	1.46%	-	3
Total	100.00%	100.00%	205

Licensing of the privately rented sector will help to preserve and improve the social and economic status of the local area			
	% Total	% Answer	Count
Number of Responses	98.05%	-	201
I agree strongly	5.85%	5.97%	12
I tend to agree	9.76%	9.95%	20

Neither agree nor disagree	12.20%	12.44%	25
I tend to disagree	22.44%	22.89%	46
I disagree strongly	47.80%	48.76%	98
No Response	1.95%	-	4
Total	100.00%	100.00%	205

licensing of the privately rented sector will reduce the impact of criminal activity on residents and businesses in Brent			
	% Total	% Answer	Count
Number of Responses	98.05%	-	201
I agree strongly	4.88%	4.98%	10
I tend to agree	8.78%	8.96%	18
Neither agree nor disagree	11.71%	11.94%	24
I tend to disagree	19.02%	19.40%	39
I disagree strongly	53.66%	54.73%	110
No Response	1.95%	-	4
Total	100.00%	100.00%	205

Q8: Selective Licensing Conditions

To what extent do you agree or disagree that the proposed selective licensing conditions above are reasonable?

	% Total	% Answer	Count
Number of Responses	94.63%	-	194
I agree strongly	15.12%	15.98%	31
I tend to agree	20.98%	22.16%	43
Neither agree nor disagree	11.22%	11.86%	23
I tend to disagree	19.02%	20.10%	39

I disagree strongly	28.29%	29.90%	58
No Response	5.37%	-	11
Total	100.00%	100.00%	205

Q8a - why?		
	% Total	Count
Number of Responses	52.68%	108
Responses	52.68%	108
No Response	47.32%	97
Total	100.00%	205

Section 4: Tackling Problems

Q9: In your opinion, should the council extend selective licensing for single family dwellings (for example self-contained flats or houses) in Brent?

	% Total	% Answer	Count
Number of Responses	98.05%	-	201
Yes, borough-wide	21.95%	22.39%	45
Yes, but only where I own/let property	0.49%	0.50%	1
Yes, but elsewhere in Brent	3.41%	3.48%	7
No	62.44%	63.68%	128
Don't know	9.76%	9.95%	20
No Response	1.95%	-	4
Total	100.00%	100.00%	205

Q9a - If elsewhere in Brent, please specify

	% Total	Count
Number of Responses	0.49%	1
Responses	0.49%	1
No Response	99.51%	204
Total	100.00%	205

Q10: In your opinion, would introducing Selective Licensing achieve any of the following? (tick all that apply)

	% Total	% Answer	% Frequency	Count
Number of Responses	43.41%	-	-	89
Shift the reliance away from using resident complaints to identify problems	4.97%	6.73%	10.73%	22
Promote a professional management ethos amongst private landlords	7.90%	10.70%	17.07%	35

Provide tenants with consistent information on acceptable standards of accommodation	7.45%	10.09%	16.10%	33
Allow the council to take action against landlords who provide poor standards of accommodation	11.06%	14.98%	23.90%	49
Remove rogue landlords from the sector	12.64%	17.13%	27.32%	56
Reduce anti-social behaviour in the borough	4.97%	6.73%	10.73%	22
Provide safe homes for tenants to live in	10.38%	14.07%	22.44%	46
Provide a strategic approach to managing housing in Brent	5.19%	7.03%	11.22%	23
Allow the council to take action against landlords whose tenants cause persistent anti-social behaviour	8.35%	11.31%	18.05%	37
Total	72.91%	98.78%		323
[Unknown Value!] "Allow the council to take action against landlords who provide poor standard of accommodation"	0.45%	0.61%	0.98%	2
[Unknown Value!] "Provide a strategic approach to managing their sector"	0.23%	0.31%	0.49%	1
[Unknown Value!] "Reduce level of anti-social behaviour in the borough"	0.23%	0.31%	0.49%	1
No Response	26.19%	-	56.59%	116
Total	172.91%	198.78%	-	766

Section 5: More about you

Q11: Please tell us your home or business postcode (if you're a managing agent):		
	% Total	Count
Number of Responses	49.76%	102
Responses	49.76%	102
No Response	50.24%	103
Total	100.00%	205

Q12: How long have you owned a property or

properties in Brent?			
	% Total	% Answer	Count
Number of Responses	98.05%	-	201
Less than one year	2.44%	2.49%	5
One to two years	4.39%	4.48%	9
Two to five years	11.22%	11.44%	23
Five to ten years	22.44%	22.89%	46
More than ten years	46.83%	47.76%	96
Prefer not to say	10.73%	10.95%	22
No Response	1.95%	-	4
Total	100.00%	100.00%	205

Q13: Gender - are you			
	% Total	% Answer	Count
Number of Responses	97.56%	-	200
Male	57.07%	58.50%	117
Female	29.27%	30.00%	60
Prefer not to say	11.22%	11.50%	23
No Response	2.44%	-	5
Total	100.00%	100.00%	205

Q14: What is your age group?			
	% Total	% Answer	Count
Number of Responses	97.56%	-	200
Under 18	0.00%	0.00%	0
18 - 24	1.46%	1.50%	3
25 - 34	8.78%	9.00%	18

35 - 44	16.59%	17.00%	34
45 - 54	28.29%	29.00%	58
55 - 60	15.61%	16.00%	32
61+	16.59%	17.00%	34
Prefer not to say	10.24%	10.50%	21
No Response	2.44%	-	5
Total	100.00%	100.00%	205

Q15: Do you have any long-standing illness, disability or infirmity? (Long-standing means anything that has troubled you over a period of time or that is likely to affect you over a period of time)

	% Total	% Answer	Count
Number of Responses	91.22%	-	187
Yes	9.27%	10.16%	19
No	81.95%	89.84%	168
No Response	8.78%	-	18
Total	100.00%	100.00%	205

Q16: How would you describe your ethnic background?

	% Total	% Answer	Count
Number of Responses	96.10%	-	197
White: English/Welsh/Scottish/Northern Irish/British	23.41%	24.37%	48
White: Irish	1.95%	2.03%	4
White: Gypsy or Irish Traveller	0.00%	0.00%	0
Any other White background	6.83%	7.11%	14
White and Black Caribbean	0.00%	0.00%	0
White and Black African	0.00%	0.00%	0
White and Asian	1.46%	1.52%	3

African: Black/African/Caribbean/Black British	1.46%	1.52%	3
Caribbean: Black/African/Caribbean/Black British	1.95%	2.03%	4
Any other Black/African/Caribbean background	0.00%	0.00%	0
Chinese: Asian/Asian British	0.98%	1.02%	2
Bangladeshi: Asian/Asian British	0.00%	0.00%	0
Pakistani: Asian/Asian British	2.44%	2.54%	5
Indian: Asian/Asian British	23.90%	24.87%	49
Any other Asian background	1.95%	2.03%	4
Arab	1.46%	1.52%	3
Any other mixed/multiple ethnic background	1.95%	2.03%	4
Any other ethnic group	0.98%	1.02%	2
Prefer not to say	25.37%	26.40%	52
No Response	3.90%	-	8
Total	100.00%	100.00%	205

Q17: What is your religion or belief?			
	% Total	% Answer	Count
Number of Responses	95.61%	-	196
Buddhist	2.93%	3.06%	6
Christian	23.41%	24.49%	48
Hindu	20.49%	21.43%	42
Jewish	1.46%	1.53%	3
Muslim	6.34%	6.63%	13
Sikh	0.00%	0.00%	0
None	12.68%	13.27%	26
Prefer not to say	25.85%	27.04%	53
Other	2.44%	2.55%	5
No Response	4.39%	-	9
Total	100.00%	100.00%	205

Q17a: What is your religion or belief, if other		
	% Total	Count
Number of Responses	0.98%	2
Responses	0.98%	2
No Response	99.02%	203
Total	100.00%	205

Q18: What is your sexual orientation?			
	% Total	% Answer	Count
Number of Responses	93.66%	-	192
Heterosexual/straight	62.44%	66.67%	128
Lesbian	0.00%	0.00%	0
Gay man	1.95%	2.08%	4
Bisexual	0.49%	0.52%	1

Prefer not to say	28.78%	30.73%	59
No Response	6.34%	-	13
Total	100.00%	100.00%	205

Q19: How did you hear about this consultation?				
	% Total	% Answer	% Frequency	Count
Number of Responses	96.59%	-	-	198
Leaflet	23.08%	23.79%	26.34%	54
Poster	7.26%	7.49%	8.29%	17
Email	21.37%	22.03%	24.39%	50
Brent website	16.24%	16.74%	18.54%	38
Brent Connects	2.14%	2.20%	2.44%	5
Brent Citizens' Panel	1.71%	1.76%	1.95%	4
Local newspaper	0.43%	0.44%	0.49%	1
Word of mouth	11.54%	11.89%	13.17%	27
Other	13.25%	13.66%	15.12%	31
No Response	2.99%	-	3.41%	7
Total	100.00%	100.00%	-	234

Q19a: How did you hear about this consultation, if other		
	% Total	Count
Number of Responses	8.78%	18
Responses	8.78%	18
No Response	91.22%	187
Total	100.00%	205

Other Stakeholders

Section 1: About you

Qestion1: Which of the following best describes you?			
	% Total	% Answer	Count
Number of Responses	97.96%	-	144
Work for a neighbouring local authority	6.12%	6.25%	9
Resident in a neighbouring borough	68.71%	70.14%	101
Business owner in a neighbouring borough	1.36%	1.39%	2
Landlord in neighbouring borough	6.12%	6.25%	9
Managing or letting agent resident in neighbouring borough	0.68%	0.69%	1
Other interested party	13.61%	13.89%	20
Total	96.60%	98.61%	142
[Unknown Value!] "Neighbouring Local Authority"	1.36%	1.39%	2
No Response	2.04%	-	3
Total	196.60%	198.61%	289

Q1: if other please give details below:		
	% Total	Count
Number of Responses	4.76%	7
Responses	4.76%	7
No Response	95.24%	140
Total	100.00%	147

Q2: I am based in...			
	% Total	% Answer	Count
Number of Responses	100.00%	-	147

London Borough of Barnet	14.97%	14.97%	22
London Borough of Camden	9.52%	9.52%	14
London Borough of Ealing	8.16%	8.16%	12
London Borough of Harrow	34.01%	34.01%	50
London Borough of Hammersmith and Fulham	2.04%	2.04%	3
Royal Borough of Kensington and Chelsea	1.36%	1.36%	2
London Borough of Westminster	4.08%	4.08%	6
Other	25.85%	25.85%	38
No Response	0.00%	-	0
Total	100.00%	100.00%	147

Q2: if other, please specify		
	% Total	Count
Number of Responses	23.13%	34
Responses	23.13%	34
No Response	76.87%	113
Total	100.00%	147

Section 2: Tackling Problems

Q3: Do you agree or disagree with the council's proposal to extend Selective Licensing in Brent?			
	% Total	% Answer	Count
Number of Responses	99.32%	-	146
Yes, borough-wide	74.83%	75.34%	110
Yes, but only where I am based	0.68%	0.68%	1
Yes, but in other areas around Brent	5.44%	5.48%	8
No	11.56%	11.64%	17
Don't know	6.80%	6.85%	10
No Response	0.68%	-	1
Total	100.00%	100.00%	147

Q3: if other areas please specify:		
	% Total	Count
Number of Responses	2.04%	3
Responses	2.04%	3
No Response	97.96%	144
Total	100.00%	147

Question 4a: Brent Council should intervene in areas suffering from high levels of anti-social behaviour			
	% Total	% Answer	Count
Number of Responses	99.32%	-	146
I agree strongly	67.35%	67.81%	99
I tend to agree	21.77%	21.92%	32

Neither agree nor disagree	4.76%	4.79%	7
I tend to disagree	1.36%	1.37%	2
I disagree strongly	4.08%	4.11%	6
No Response	0.68%	-	1
Total	100.00%	100.00%	147

Q4b: Brent Council should have more control over the way private landlords manage their properties			
	% Total	% Answer	Count
Number of Responses	98.64%	-	145
I agree strongly	48.30%	48.97%	71
I tend to agree	22.45%	22.76%	33
Neither agree nor disagree	12.24%	12.41%	18
I tend to disagree	6.80%	6.90%	10
I disagree strongly	8.84%	8.97%	13
No Response	1.36%	-	2
Total	100.00%	100.00%	147

Q4c: Licensing of the privately rented sector will help to reduce anti-social behaviour in the borough			
	% Total	% Answer	Count
Number of Responses	97.96%	-	144
I agree strongly	46.94%	47.92%	69
I tend to agree	25.17%	25.69%	37
Neither agree nor disagree	11.56%	11.81%	17
I tend to disagree	4.76%	4.86%	7
I disagree strongly	9.52%	9.72%	14
No Response	2.04%	-	3
Total	100.00%	100.00%	147

Q4d: Licensing of the privately rented sector will ensure that properties in poor condition are properly managed to prevent further deterioration			
	% Total	% Answer	Count
Number of Responses	99.32%	-	146
I agree strongly	59.18%	59.59%	87
I tend to agree	22.45%	22.60%	33
Neither agree nor disagree	6.80%	6.85%	10
I tend to disagree	4.08%	4.11%	6
I disagree strongly	6.80%	6.85%	10
No Response	0.68%	-	1
Total	100.00%	100.00%	147

Q4e: Licensing of the privately rented sector will ensure that people who occupy properties do not live in poorly managed housing or unacceptable conditions			
	% Total	% Answer	Count
Number of Responses	100.00%	-	147
I agree strongly	61.22%	61.22%	90
I tend to agree	20.41%	20.41%	30
Neither agree nor disagree	8.84%	8.84%	13
I tend to disagree	3.40%	3.40%	5
I disagree strongly	6.12%	6.12%	9
No Response	0.00%	-	0
Total	100.00%	100.00%	147

Question 4f: Licensing of the privately rented sector will help to preserve and improve the social and economic status of the local area			
	% Total	% Answer	Count
Number of Responses	99.32%	-	146
I agree strongly	47.62%	47.95%	70
I tend to agree	27.21%	27.40%	40
Neither agree nor disagree	12.24%	12.33%	18
I tend to disagree	4.76%	4.79%	7
I disagree strongly	7.48%	7.53%	11
No Response	0.68%	-	1
Total	100.00%	100.00%	147

Q4g: Licensing of the privately rented sector will reduce the impact of criminal activity on residents and businesses in Brent			
	% Total	% Answer	Count
Number of Responses	96.60%	-	142
I agree strongly	36.73%	38.03%	54
I tend to agree	25.85%	26.76%	38
Neither agree nor disagree	17.01%	17.61%	25
I tend to disagree	8.16%	8.45%	12
I disagree strongly	8.84%	9.15%	13
No Response	3.40%	-	5
Total	100.00%	100.00%	147

Q5: To what extent do you agree or disagree that the proposed selective licensing conditions above are reasonable?			
	% Total	% Answer	Count
Number of Responses	96.60%	-	142
I agree strongly	57.82%	59.86%	85
I tend to agree	28.57%	29.58%	42

Neither agree nor disagree	3.40%	3.52%	5
I tend to disagree	2.72%	2.82%	4
I disagree strongly	4.08%	4.23%	6
No Response	3.40%	-	5
Total	100.00%	100.00%	147

Q5a: If you 'tend to disagree' or 'disagree strongly' with the proposed selective licensing conditions, please tell us why		
	% Total	Count
Number of Responses	10.88%	16
Responses	10.88%	16
No Response	89.12%	131
Total	100.00%	147
Q6: If you have any further comments regarding this proposal, please tell us below:		
	% Total	Count
Number of Responses	12.93%	19
Responses	12.93%	19
No Response	87.07%	128
Total	100.00%	147

Section 3: More about you

Postcode: Please tell us your postcode		
<i>Note: this question does not have a sequential question number</i>		
	% Total	Count
Number of Responses	76.87%	113
Responses	76.87%	113
No Response	23.13%	34

Total	100.00%	147
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Q7: How long have you owned property/properties in Brent?			
	% Total	% Answer	Count
Number of Responses	98.64%	-	145
Less than one year	0.68%	0.69%	1
One to two years	1.36%	1.38%	2
Two to five years	3.40%	3.45%	5
Five to ten years	2.72%	2.76%	4
More than ten years	13.61%	13.79%	20
Don't own a property in Brent	65.31%	66.21%	96
Prefer not to say	11.56%	11.72%	17
No Response	1.36%	-	2
Total	100.00%	100.00%	147

Q8: Gender - are you?			
	% Total	% Answer	Count
Number of Responses	97.96%	-	144
Male	53.74%	54.86%	79
Female	40.82%	41.67%	60
Prefer not to say	3.40%	3.47%	5
No Response	2.04%	-	3
Total	100.00%	100.00%	147

Q9: What is your age group?			
	% Total	% Answer	Count
Number of Responses	99.32%	-	146
Under 18	0.68%	0.68%	1
18 - 24	0.68%	0.68%	1

25 - 34	15.65%	15.75%	23
35 - 44	23.13%	23.29%	34
45 - 54	30.61%	30.82%	45
55 - 60	10.88%	10.96%	16
61+	12.24%	12.33%	18
Prefer not to say	5.44%	5.48%	8
No Response	0.68%	-	1
Total	100.00%	100.00%	147

Q10: Do you have any long-standing illness, disability or infirmity? (Long-standing means anything that has troubled you over a period of time or that is likely to affect you over a period of time)			
	% Total	% Answer	Count
Number of Responses	95.24%	-	140
Yes	6.80%	7.14%	10
No	88.44%	92.86%	130
No Response	4.76%	-	7
Total	100.00%	100.00%	147

Q11: How would you describe your ethnic background?			
	% Total	% Answer	Count
Number of Responses	97.28%	-	143
White: English/Welsh/Scottish/Northern Irish/British	20.41%	20.98%	30
White: Irish	3.40%	3.50%	5
White: Gypsy or Irish Traveller	0.00%	0.00%	0
Any other White background	7.48%	7.69%	11
White and Black Caribbean	0.00%	0.00%	0
White and Black African	0.00%	0.00%	0
White and Asian	1.36%	1.40%	2
African: Black/African/Caribbean/Black British	7.48%	7.69%	11

Caribbean: Black/African/Caribbean/Black British	8.16%	8.39%	12
Any other Black/African/Caribbean background	0.00%	0.00%	0
Chinese: Asian/Asian British	0.00%	0.00%	0
Bangladeshi: Asian/Asian British	1.36%	1.40%	2
Pakistani: Asian/Asian British	3.40%	3.50%	5
Indian: Asian/Asian British	20.41%	20.98%	30
Any other Asian background	2.72%	2.80%	4
Arab	2.04%	2.10%	3
Any other mixed/multiple ethnic background	2.04%	2.10%	3
Any other ethnic group	0.68%	0.70%	1
Prefer not to say	16.33%	16.78%	24
No Response	2.72%	-	4
Total	100.00%	100.00%	147

Q12: What is your religion or belief?			
	% Total	% Answer	Count
Number of Responses	98.64%	-	145
Buddhist	0.00%	0.00%	0
Christian	33.33%	33.79%	49
Hindu	14.29%	14.48%	21
Jewish	1.36%	1.38%	2
Muslim	12.93%	13.10%	19
Sikh	0.68%	0.69%	1
None	12.24%	12.41%	18
Prefer not to say	21.09%	21.38%	31
Other	2.72%	2.76%	4
No Response	1.36%	-	2
Total	100.00%	100.00%	147
Q13: What is your sexual orientation?			
	% Total	% Answer	Count
Number of Responses	97.28%	-	143
Heterosexual/straight	72.79%	74.83%	107
Lesbian	0.00%	0.00%	0
Gay man	2.04%	2.10%	3
Bisexual	2.04%	2.10%	3
Prefer not to say	20.41%	20.98%	30
No Response	2.72%	-	4
Total	100.00%	100.00%	147
Q14: How did you hear about this consultation?			
	% Total	% Answer	% Frequency
Number of Responses	97.96%	-	-
Leaflet	3.90%	3.97%	4.08%

Poster	8.44%	8.61%	8.84%
Email	6.49%	6.62%	6.80%
Brent website	9.09%	9.27%	9.52%
Brent Connects	3.90%	3.97%	4.08%
Brent Citizens' Panel	0.65%	0.66%	0.68%
Local newspaper	1.95%	1.99%	2.04%
Word of mouth	13.64%	13.91%	14.29%
Other	50.00%	50.99%	52.38%
No Response	1.95%	-	2.04%
Total	100.00%	100.00%	-

Question 14: if other, please specify		
	% Total	Count
Number of Responses	47.62%	70
Responses	47.62%	70
No Response	52.38%	77
Total	100.00%	147

Appendix 7: Responses to Consultation

Title: Detailed Summary of Consultation Responses and Considerations	
Overall Purpose: To provide a bridging document capturing key consultation issues and LB Brent actions as a result of the consultation	Author: Tony Jemmott
Introduction: Section 80(9)(b) Housing Act 2004 requires the Council to consider any representations made in accordance with the consultation which are not withdrawn. Written responses to the consultation came from several stakeholders but notably from the landlord representative organisations. Some comments have been considered as part of the Equalities Analysis. The representations received are captured in this document and summarised as themes. The themes are not ranked but give an indication of the main areas where issues were raised, the strength of views and the balance of opinion. The table shows the council's	

considerations and any change actions.

- | | |
|---|--|
| <ul style="list-style-type: none"> 1. Scheme Designation 2. Licence Fees & Financial Implications 3. Anti-social Behaviour (ASB) 4. Improving PRS standards/Poor property management 5. HMOs 6. Administering the scheme 7. Socio-economic impact 8. Support for the scheme 9. Enforcement | <ul style="list-style-type: none"> 10. Strategic Approach 11. Support for landlords 13. The proposals, timing and alternatives 14. Evidence base/ Criteria for introducing selective licensing 15. Review the existing scheme 16. Licence conditions 17. Impact on tenants 18. Legal implications 19. General opposition to licensing |
|---|--|

R e f .	Consultation Representation	Consideration & Response	Action & Change	Theme 1
Email VC. Resident Thu 10/1120 16 08:50	In response to your survey, the scheme needs to be widened to North Wembley and Sudbury for certain.	Ward by ward analysis has been undertaken as part of the evidence to support extending selective licensing to areas in the north of the borough.	Considered. Evidence base updated	Scheme Designation
	In addition, the license fee should be increased dramatically. It is an absolute joke and other councils (e.g. Harrow) charge at least double.	Fee structure to be presented to ensure that the scheme is self-financing. It is accepted that the Brent fee is lower than seen elsewhere. Elements to also look at in setting the fee structure will include enforcement costs following Hemming Westminster ruling. A detailed fee breakdown will be presented.	Agreed. Fee structure analysis	Licence Fees
	The ASB that comes with HMOs is horrendous. Please confirm safe receipt.	Borough wide HMO licensing is already in place in Brent. Our evidence indicates a high correlation of ASB with HMO properties. Further we acknowledge the interrelationship of HMO licensing and selective licensing	No change. Standard acknowledgement sent.	ASB

<p>Email: Resident Thu 10/11/2016</p>	<p>With respect to your consultation you really have to increase the license fee dramatically. It is ridiculously too low. Should be increased 10-fold. Current amount is a joke.</p>	<p>Fee structure to be presented to ensure that the scheme is self-financing. Elements to also look at enforcement costs following Hemming Westminster ruling.</p>	<p>Considered</p>	<p>ASB</p>
<p>Individual landlord response - Email 23/10/2016 21:47 landlord</p>	<p>I am a private landlord in Willesden Green and my work is associated with many boroughs in London. Having spent some times talking with colleagues and friends about Brent's selective licence, I feel it may be helpful to write down some thoughts in response to the survey regarding Private Rented Sector Licensing. The proposal for the licence has not given any true reason for the purpose. The proposal says that there is '<u>a strong link between levels of anti-social behaviour and homes that are rented out privately.</u>' This cannot be true. In London, the private letting mainly deal with working professionals and students at colleges, they are as responsible as any home owners in London, they work hard to pay for their life style and rent. There is no correlation between them and anti-social behaviour. As we know, the most trouble makers are council's tenants, most of them cannot have jobs or education so that they become a source for antisocial activities. Most private landlords do not want to take DSS because of this reason.</p>	<p>The analysis of the PRS indicated that the sector is very varied. While a significant amount of professionals and students occupied the sector, it is now the only realistic offer for many new entrants and families, many of whom are vulnerable. Our consultation exercise and equalities assessment provides evidence of the makeup of the sector in Brent and further demographic study. The evidence base is updated and this clearly shows that the correlation between ASB and the PRS is positive, and even more so than in the social tenure</p>	<p>No change. Evidence base reviewed</p>	<p>ASB</p>
<p>Individual landlord response - Email 23/10/2016 21:47 landlord</p>	<p>The application of the license does not solve the root of the problem of why some accommodations are in poor conditions. A property in poor condition is because the landlord lacks income to invest in it. The letting business follows its own laws of free letting market. No need to introduce a manual rule. The better a place is, the quicker the place can be rented out. The application of the licence does not give any practical help but merely takes away a lump of money from the letting. Most leaseholders</p>	<p>Licensing will be combined with other measures to target improve poor property conditions. While we accept that some landlords may have difficulty in raising funds needed for repairs, there are many instances and other reasons where there is an unwillingness by landlords to take steps or seek help to</p>	<p>Considered.</p>	<p>Improving PRS standards. Assistance to landlords</p>

	<p>have to pay high mortgages, service charges and house bills with their rent income. They have to face the time when the bank rates go up, roof replacement is due, boiler needs to repair and major works demand. The licence purely make the letting situation even harder.</p>	<p>improve their properties. The council supports the request by landlord to provide practical help. We aim to pursue this through our landlords forums and focus group.</p>		
<p>Individual landlord response - Email 23/10/2016 21:47 (L-L Wood)<liu.li@ms-l.co.uk></p>	<p>It is not clear what is HMO. If a house or a flat has more than 3 or 4 bedrooms, this is perfect right to house 3 or 4 tenants. Can this be called overcrowded ? All student flats are operated on this format. What is a HMOs licence for? Would it mean once a property has obtained the licence, then it can be hold as many people as the owners wish ??</p>	<p>The legislation provides a statutory definition of HMO but we accept that for many this is not always clear. We have provided clarification on the Councils website. As far as the requirement for an HMO licence in Brent we state that this will relate to 3 or more unrelated persons who live at the property and share at least one basic amenity. We continue to accept that the HMO clarification is important for our landlords and residents. An HMO licence sets a maximum permitted number of persons or households who can occupy the property. Occupation above this number is deemed overcrowded. Please note that we have not set occupancy limits in relation to selective licences.</p>	<p>No change</p>	<p>HMO definition</p>

<p>Individual response - Email 23/10/2016 21:47 (L-L)</p>	<p>The enforcement of the license could easily exceed the money collected. The standard enforcement regime will be very complicated, time-consuming and expensive. It is almost an impossible task in many cases. Firstly, the letting is not static, tenants move in and out frequently, it is hard to pin down how many people living there at a particular time. Secondly, it is extremely ridiculous to clarify what relationships are between tenants. Are they boyfriends or girlfriends? Are they cousins or step sisters? It would be convenient for landlords to declare these tenants have some sort of relationships including gay relationship if the answer could avoid the high fee. How could the council get the information if a flat is HMO or not? It is not a solid policy if you are found out you pay, if not found out, you don't pay !!!! Most of all, these HMO tenants have nothing to do with antisocial behaviour. There is no difference between a related HMO than a non-related HMO in practice.</p>	<p>We will examine our fee setting and structure to ensure that the licensing function is self-financing. Enforcement action will be robust but balanced and we will be guided by the Hemming v Westminster ruling in terms of levying enforcement costs. In addition we will recover our costs through incurred by prosecution through the courts, and when permitted, through fixed penalties, rent repayment orders and Proceeds of Crime provisions. We accept that tenancies may change during the life of the licence. However, in most cases the landlords provide the correct information to allow us to correctly licence the property. As part of processing we have access to a number of databases and we seek to clarify the relationship between the tenants where we feel that we need to do so. If licensing goes ahead we will review our licensing policy</p>	<p>Considered. We will use the new provisions in the Housing and Planning Act 2016 to help to cover our enforcement work</p>	<p>Administering the scheme</p>
<p>Individual landlord response - Email 23/10/2016 21:47 (L-L)</p>	<p>The high licence fee contributes nothing but a chance for a corrupted bureau. Camden council believes the letting business boosts local economy. The rent income will eventually return back to Camden communities, money in local people's hands will distribute to local shops, restaurants, and keep local business running and booming. Successful local businessmen are happy to sponsor younger people</p>	<p>We do not accept that Brent's current basic licence fee is high as it is known to be one of the lowest, if not the lowest in London. We have looked at the police crime statistics for Brent and have compared these with statistics across other London Boroughs and have also looked</p>	<p>No change</p>	<p>Socio-economic impact</p>

	<p>education and local artists' activities; there are many free magazines and free festivals run by local fundings, it creates wonderful communities in the borough. Tenants prefer to pay £800 to live in Camden than £400 in Brent, Why? It is much more crowded in Camden in tern of living space than that in Brent, with less crimes. It is very wrong that the proposal suggests the Brent's crime has something to do with the increasing population ??</p>	<p>at occurrences of all recorded ASB crime in Brent. The findings form part of our evidence base.</p>		
<p>Individual response - Email 23/10/2016 (L-L Wood)<liu.li@ms-l.co.uk></p>	<p>Most private landlords would not be happy to pay a high fee £540, also every 5 years. The fee is extremely high. We pay £450 a year to water bill for a 2 bedroom flat, £300 a year for electricity bill, £250 for mobile usage a year, £140 TV licence, we have to ask what the £540 fee the council would provide us with in 5 years? The licence can only staff few jobs in the council at the expensive of depressing the local letting business! The licensing is NOT entrepreneurial to generate economy but do the opposite, constrain the letting business so in result to constrain the development of the local business. Many shop owners are also landlords, the rent income normally funds the shops.</p>	<p>The proposed basic selective fee of £540 for 5 years could be subject to discounts for certain landlords and may be held down for an introductory period. We will review the fee and look at delegated authority to make fee changes to ensure the scheme is adequately financed and financial burdens are not passed to good landlords or local rate paying residents.</p>	<p>Considered. To develop fee structure</p>	<p>Licence Fees</p>
<p>Individual landlord response - Email 23/10/2016</p>	<p>In all, the licence fee doesn't serve its end to improve the living standard. It is not right direction where the council should direct its energy into. More people live in this area. The money in local people's hand is better than it in local bureaucrats if you want to promote local business and healthier communities. A successful local government is not because of its location but its ability to attract and support local business. Hope my time and thoughts spending on this can be appreciated</p>	<p>The Council is allowed to charge a licence fee to cover the administration of the licensing function under Part 3. This may take into account dealing with management orders (Chapter 1 of Part 4) in relation to improving the living standards. The consultation exercise specifically targeted responses from local businesses and other stakeholders. Overall this group were supportive of the councils proposals.</p>	<p>No change</p>	<p>Socio-economic impact</p>



<p>Email: Fri 11/11/2016 10:57 Residents Mr & Mrs M, Wembley HA0</p>	<p>We are in favour of extending the scheme so that it applies to most or even all the borough Of Brent. Thank u</p>	<p>Resident's support extending the selective licensing to all of the borough as mentioned in the proposal.</p>	<p>Noted. No change</p>	<p>Support for scheme</p>
<p>Email: Resident Fri 11/11/2016 13:56</p>	<p>Dear Sir/ Madam, I as member of SPRINGFIELD ESTATE Colindale / Kingsbury agree the proposal that the LandLords should have Landlord LICENSE. If you have this scheme in mention places why did you not do same rest of the places. We have already mention problems to CLR RUTH MOHER, regarding neighbourhood around the borough Antisocial behaviour, overcrowding nuisance neighbours, and fly tipping. Sooner the better bring LANDLORD LICENSING. Thanks.</p>	<p>Resident's support for a scheme in other places of the borough. Our study will look at the incidences of ASB and its link with the PRS in all wards. Where the evidence is good for Colindale/Kingsbury or where other criteria's are relevant, consideration will be given to include these areas as part of the designation.</p>	<p>Considered</p>	<p>Support for scheme</p>
<p>Email: Greenfield . Resident. Mon 14/11/2016 11:54</p>	<p>This is a very good idea and should definitely be introduced all over the borough and the country. However the rules must be properly enforced and some consideration given to landlords who only own one property which they may have inherited.</p>	<p>Resident's support for a borough wide scheme. The Council will be committed to enforcing the scheme and this will be set out in its enforcement policy. The enforcement will be proportionate and graduated and will take into consideration the challenges faced by incidental landlords</p>	<p>No change</p>	<p>Enforcement</p>

<p>Email sent: Thu 17/11/2016 20:55 @gmail.com, Lynton Rd NW6</p>	<p>I am responding to the Brent consultation re private landlord licensing. Our 2 flats that we rent out with a standard AST are kept to the same standard as we ourselves would live in, so why should we have to pay a very expensive licence fee to Brent Council which we would have to pass on to the tenants and further exacerbate the cost of renting in London. We are also members of the NLA and follow their guidelines, register deposits and provide all information regarding statutory requirements. We address all tenant enquiries as soon as possible and carry out repairs to a high standard after researching what is available. If as you say, and I quote, "Much of the private rented sector in Brent is well run and in good condition", so why would you burden these landlords (and tenants) with an additional licence fee? How much is Brent Council going to collect from the 1000s of good private landlords that manage their properties to a high standard to compensate for the few that don't? Do we want bad tenants that damage our flats? No. Would you rather we pay Brent Council for a licence fee we don't need rather than spending it on the property, new paint, a better quality washing machine rated to a high energy and efficiency rating? The cynic in me wonders in by forcing good landlords to pay these fees that more properties will be handed to housing associations to manage on behalf of Brent Council as you don't have enough housing stock!</p>	<p>The licence fee is designed to cover the cost of administration and to be as low as possible. Calculated over the 5 years it represents a relatively small cost to landlords. It is understood that fees may be recovered by landlords as legitimate expenses. We can only licence fees on matters relating to administering of the licensing scheme.</p>	<p>Rejected</p>	<p>Licence Fees</p>
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<p>Email sent: Thu 17/11/2016 20:55 Lynton Rd NW6</p>	<p>Shouldn't anti-social behaviour be an issue that is covered by the police for which I already pay taxes for? So, to be taxed again for something that I will get zero benefit for does not seem just. I am aghast and horrified that you would put the blame of antisocial behaviour at the feet of private landlords, do you have evidence that more anti-social behaviour is performed by those living in privately rented properties than council flats or private dwellings? It isn't the landlord that is responsible for the behaviour of the tenant in as much as a parent isn't responsible for the behaviour of their adult children.</p> <p>http://www.landlordlawblog.co.uk/2014/08/21/hmo-legal-basics-licensing-3/?doing_wp_cron=1479405449.6535599231719970703125</p> <p>Additionally I would like to let you know about our neighbours, four flats managed by Genesis Housing, and the ongoing battle for them to manage their property to a standard we would consider reasonable. To this day I am the person that weeds their carpark and clears rubbish from it on a weekly basis as I can't get Genesis or the tenants to do it. You are welcome to contact me and I will show you around our 2 flats and you can tell me if you think by having a licence will change who I let it to and the standards I adhere to. I am going to forward this email to the Brent MPs for their input, and probably speak with a couple of journalists because this level of bureaucracy and broad stroke accusation does not feel correct.</p>	<p>We have provided a definition of ASB. Some of which is Council reported and dealt with by Brent, and other forms of ASB are Police reported ASB. Given that ASB is a huge problem in Brent we believe that it is best tackled using a multi-agency and co-ordinated approach. Private rented sector landlords and tenants have a role to play to eliminating or reducing ASB as we have shown that there is a strong link between ASB incidences in Brent and its PRS. In contrast social landlords are responsible for dealing with ASB, however social landlords are mostly exempt from licensing. Our links with Brent Housing Partnership and the RSL Forum will provide a route for engaging with social landlords to address problems of ASB in the social rented sector. Our evidence report will be shared with our Brent Housing Partnership as this helps to identify ASB and crime hotspots in the borough.</p>	<p>Considered.. No change</p>	<p>ASB</p>
<p>Email: 30 November 2016 11:50 Cairnfield Residents Association</p>	<p>Issues connected with this issue have often been raised in meetings. More and more properties are converted and let to tenants in the area we cover.</p>	<p>Selective licensing will apply to all PRS properties and will especially cover converted properties many of which are unlawfully and poorly converted</p>	<p>Accepted</p>	<p>Scheme Designation</p>

ion				
Email:h otmail.c om>Tue 06/12/2 016 15:28	<p>Dear sir</p> <p>I am sorry to say that Brent council like the national government are using private landlords like cash cows to supplement their incomes and because they are easy targets for fund raising. They talk about rogue landlords but there are more rogue tenants, who treat the tenancy like 5 star hotels where repairs and up dates have to be done yesterday. It seems that more regulation involves more costs which are not always deductible .Private landlords are viewed as villains by council workers and councillors. If state can provide all the housing needs then there would not be a need for private landlords. Most tenants trash property at end of agreement and getting money is becoming nigh impossible to repair.</p> <p>Councils talk about affordable housing but what is affordable if you are on low pay. Councils view multiple occupation with distaste but surely it is better to have roof over your head when you know you cannot afford to go it alone. Licenses introduced a few years ago ultimately leads to higher rents. Brent council should look to reduce expenditure so more landlords could come in and reduce the housing shortfall. Furthermore the planning departments also has to be accountable as new builds are increasingly difficult as planning departments demand more and more amendments before they will approve plans. In my case they rejected first application due to room in loft. We pointed to a precedence of loft rooms on second application that it was approved. They also demanded £3000 per bedroom before approval thus increasing costs. Where do you think these costs will be recouped?</p> <p>I believe Brent Council needs to get back to the drawing board and make clear what they actually</p>	<p>Brent Council recognises that there are many good landlords but also that there are some bad and criminal landlords who are failing to act responsibly. The council is also conscious of its obligation to ensure an adequate supply of good quality affordable homes to meet the needs of its residents. The cost of licensing in Brent is low and is designed to cover the administration of the function over the 5 year licence term. The licensing function links in relation to planning development as part of Brent's overall Housing Strategy.</p>	No change	Strategic approach

		<p>want. More flats and houses for housing needs or to fill their coffers at the expense of the private landlords who would otherwise use these funds to improve the housing stock. After all is that not what everybody wants.</p>			
Individual response Email 27/11/16	Setting HMO fees		<p>The fee is based on the time spent in processing the application. Some larger properties which are Houses in Multiple Occupation (HMOs) will be licensable under the HMO mandatory licensing scheme. There is a separate fee structure for these properties which reflects that they are larger houses. We will be clear on how our fees for both HMOs and single family houses are structured</p>	Not accepted	Licence Fees

<p>Hand written response Email 28/11/16. Mr R M H</p>	<p>Dear Sirs</p>  <p>In response to your letter - in my opinion, for what it is worth, all rented properties should be licensed, failing to do so would incur a heavy fine. A fee imposed to cover the cost of a health and safety inspection.</p> <p>The landlord of a property where upon a tenant is occupying a toilet in the garden and the tenant claims the landlord has confiscated his passport, would be fined heavily, part of that fine would cover the person's air fare should he wish to return to his country of origin. If he is illegal, contribute to his transport. This would also apply to the occupancy of a garage.</p> <p>Landlords should not be furnished of a forthcoming inspection.</p> <p>One side of a road not far from where I live, I suspect several houses are visited, the state of the front gardens, grass, weeds, litter, childrens clothes, shoes, toys dumped by the front gate.</p> <p>Just a few yards away is a side turning, a dumping ground for a piece suits, mattresses, fridges, an old car full of junk. YOU NAME IT!</p> <p>All it takes is a phone call to the council, and they will collect.</p> <p>I don't possess a computer and I'm not a tenant.</p> <p>Int. R. M. Hogben P. T. O.</p> 	<p>Support for all private rented properties to be licensed.</p> <p>Supporting the issues of tidy front gardens and dumped rubbish near his home. Our website has been updated to allow residents to report problem private rented properties</p>	<p>Noted. No change</p>	<p>Support for scheme</p>
	<p>Additionally I would like to let you know about our neighbours, four flats managed by Genesis Housing, and the ongoing battle for them to manage their property to a standard we would consider reasonable. To this day I am the person that weeds their carpark and clears rubbish from it on a weekly basis as I can't get Genesis or the tenants to do it.</p>			
<p>Email Sun 18/12/2016 00:24 Shah @gmail.com></p>	<p>Dear Sir/Madame</p> <p>We received the Brent Magazine today, Saturday and read about the private landlord consultation that was ended yesterday. As we didn't know about the consultation we couldn't respond. We live next to a multi- occupancy house, xx Grasmere Avenue, which has been a nuisance due to an errant, negligent landlord. I would like to add my concerns to the consultation as there appears no solutions that the council can offer regarding his mismanagement and the safety of his property or his regard for his many tenants and neighbours. Please let me know who I can</p>	<p>HMO Complaint indicating solutions are needed to address PRS mismanagement. The council will inspect all HMO during the life of the licence. Moreover there is evidence that information about licensing needs to be provided to tenants on how to complaint to the Council.</p>	<p>Noted. Referred for investigation Jan 2017</p>	<p>Poor property management</p>

		<p>speak to regarding this.</p> <p>.</p>			
<p>Isobel Thomson Chief Executive NALS Isobel.Thomson@nalscheme.co.uk London Property Licensing Richard Tacagni MCIEH CEnvH Managing Director Richard@londonpropertylicensing.co.uk> Wed 14/12/2016 18:11</p>	<p>Overview We understand that Brent Council is seeking to introduce a second selective licensing scheme to complement the existing additional and selective licensing schemes that were introduced by the council in January 2015. Having studied the consultation documents, we remain somewhat confused about the size and extent of the proposed licensing scheme. In paragraph 4.1 of the consultation proposal, it says: "The Council is proposing that selective licensing is extended to all or some other wards within Brent" and in paragraph 8.0 it says: "...proposals to extend selective licensing to all, or most areas of the borough". We can find no explanation setting out what is meant by 'some other wards' or 'most areas'. As such, we have made the assumption that the proposal involves extending the selective licensing scheme borough wide. It is our view that if any alternative proposal is developed post-consultation, it should be subject to a further round of consultation in accordance with the Housing Act 2004. We think that all interested parties should be given the opportunity to submit representations on the actual proposal before it is presented to the Cabinet for approval. The full text is included as a written submission in the Appendix.</p>	<p>Brent is clear in its proposal to extend selective licensing to most or all of the borough and we have stressed this point at meetings and communication channels. We feel that there is sufficient evidence to warrant the wider coverage but accept that as this is new ground for local authorities, that this will be a challenge to present the case to cabinet, and moreover to gain confirmation by the Secretary of State given the Government's position on borough wide schemes. The council believes that the consultation proposal is sufficient clear about the intended area and nowhere else, that is, from the forums, responses etc has it been raised to suggest that the proposal is not clear.</p>	<p>Considered. The scheme designation is clarified.</p>	<p>Scheme Designation</p>	

<p>NALS @nalsc heme.co .uk Wed 14/12/2 016 18:11</p>	<p>One of our concerns about the roll-out of new licensing schemes is the lack of consistency that this brings in the regulation of the private rented sector. We understand there are already over 20 separate licensing schemes operating in London, each with different terms and conditions. This creates difficulty and confusion for larger portfolio landlords and letting agents in trying to understand what schemes apply where, with associated compliance risks.</p>	<p>As with the existing schemes in Brent, if selective licensing is extended we will provide and publish updated guidance and undertake to provide this information to landlords, agents, tenants and other residents through a variety of communication channels. Our licensing staff are now well experienced in providing written and verbal responses to queries. We will undertake staff refresher training and provide an new licensing communications plan in 2017.</p>	<p>Considered. No change</p>	<p>Support for landlords</p>
<p>NALS @nalsc heme.co .uk Wed 14/12/2 016 18:11</p>	<p>Given the government's recent decision to expand the mandatory HMO licensing scheme in 2017, we would encourage the council to place any new scheme on hold in order to concentrate efforts on implementing and enforcing the extended mandatory HMO licensing scheme and the associated transitional arrangements.</p>	<p>Our proposal is in relation to selective licensing. There is already borough wide HMO licensing in place in Brent. We have closely followed the progress of the Housing and Planning Act 2016 and have readjusted our business planning. We therefore will need to passport or licence some HMOs as mandatory and administratively, and we believe that depending on the transitional arrangements and DCLG timings, we are well placed to do so. We anticipate economies of scale as the Government intends that the new arrangements will be in place by October 2017. We intend to best coordinate any implementation plans if the decision is</p>	<p>Considered. Forward plans adjusted</p>	<p>Timing of the proposal</p>

			made to go ahead with the proposal.		
NALS@nalsc heme.co.uk	The council should also prioritise effective resourcing of the licensing schemes that were implemented in January 2015. Whilst the mandatory HMO and selective licensing schemes appear to have been reasonably successful, the same cannot be said for Brent's additional licensing scheme. According to the consultation report, approximately 16,000 applications had been expected under the additional licensing scheme and yet almost 2 years into the five-year scheme, only 1,348 applications have been approved – only 8% of the expected number.	We have made great efforts to encourage voluntary applications from landlords and believe that we have struck a good balance between effectively resourcing the licensing function and the scheme costs. It is clear that the introduction of additional HMO licensing borough wide has had a very positive impact on the increase in the update of mandatory licensing. This figure has risen from less than 150 received April 2006 and October 2014 to the present total of approx. 500. We are confident that extending selective licensing will increase the number of voluntary HMO applications. We stress that we see this as a beneficial outcome and not as the reason for wishing to extend selective licensing widely in Brent. We have now carried out further planned internal (Business Intelligence Team) and external research project work (MHA and GLA-LODA) to identify unlicensed HMOs. Overall the	Accepted. Further HMO identification research undertaken.	Review of existing scheme	
		consultation			

			responses emphasise more enforcement activity against unlicensed HMO properties		
Wed 14/12/2 016 18:11	Paragraph 5.2 of the report says: “In seeking to deal with the poor standards of those properties which are outside the Harlesden, Wembley Central and Willesden Green selective designation and including for the large number of HMOs whose owners have neglected to apply for licences, our standard enforcement regime can be complicated, time-consuming and expensive. This makes it difficult for us to act quickly against poorly-managed private rented properties....”. and paragraph 6.0 says:	Introductory comment	Noted		
NALS @nalsc heme.co .uk London Property Licensin g Richard @londo npropert ylicensin g.co.uk> Wed 14/12/2 016 18:11	<i>“There is evidence however that many HMOs in the borough remain unlicensed, poorly managed and are in an unsatisfactory state of repair. We are clearly of the opinion that extending selective licensing will greatly benefit efforts to improve the uptake of HMO additional licences”.</i> We do not think it is logical to say that with so few applications submitted under the current licensing scheme, it supports the business case to introduce licensing for another 16,000 single family rented properties. The new licensing scheme would need to be enforced using the same 'complicated, time-consuming and expensive' regime that the council is already finding problematic.	Identifying and investigating HMO properties is a far more complex task that to do so for single family rented properties. The evidence of the successful update of selective licensing in Brent as well as in other London boroughs e.g. Newham, Waltham Forest are good examples. What we mean is that widening selective licensing should improve the uptake of HMO licenses as we have found with the improved update of mandatory licenses. We stress that to improve the additional licensing update is not the Council's reason for proposing to extend	No change	Review of existing scheme	

			selective licensing although we expect to gain benefits and economies of scale to licensing generally.		
NALS Isobel.Thomson@nalscheme.co.uk London Property Licensing @londonpropertylicensing.co.uk> Wed 14/12/2016 18:11	We also note that this blanket licensing scheme would need Secretary of State approval, whereas the government have already highlighted their objection to the introduction of such blanket schemes. The government's view on this issue was reinforced when they rejected a proposal by Redbridge Council for a borough wide selective licensing scheme in late 2015.	We have clearly stated that as the 20% rule will apply that we will need confirmation of any cabinet approval. We were however determined to look at the overall picture as it related to our whole area, and to hear from our residents and landlords so to present a proposal which presents the evidence by looking at all wards. We have made the DCLG aware of our proposals and have met with them as part of the consideration process for a scheme to most or all of the borough. Our licensing managers have also been keeping abreast of recent developments elsewhere concerning licensing schemes.	Change. Multiple designation concept along the thinking of Peterborough City Council	Scheme Designation	
Isobel Thomson Chief Executive NALS Isobel.Thomson@nalscheme.co.uk London Property Licensing Richard Tacagni MCIEH CEnvH	Given so little progress has been made in implementing the existing additional licensing scheme, we think the council should be utilising their resources to promote and enforce the existing scheme before considering the introduction of another scheme.	We accept that the number of voluntary additional HMO applications are far less than we expected. It is difficult to compare the achievements with other councils as several factors must be taken into account. More HMO applications seem to be made where there is a wider selective licensing schemes in place and where "early bird" discounts are offered.	Noted	Review of existing scheme	

<p>Managing Director Richard @londonpropertylicensing.co.uk> Wed 14/12/2016 18:11</p>		<p>The measures we have used are now supported a dedicated communications officer and by more robust enforcement and these will continue. Within the last year we have undertaken more unannounced visits leading to 100 successful prosecutions, over £500,000 court fines and more than £100,000 in costs. Moving forward we will be part of a GLA on a Data intelligence project (LODA & NESTA) and will take advantage of the tenancy deposit scheme information now that that access to this database has been granted to Private Housing Departments.</p>		
<p>NALS Isobel Thomson @nalscheme.co.uk London Property Licensing Richard @londonpropertylicensing.co.uk> Wed 14/12/2016 18:11</p>	<p>Extending selective licensing – the evidence base Having examined the evidence base that accompanies the consultation proposal, we can see there are certainly issues with crime, anti-social behaviour and poor housing conditions in some parts of the borough. We do support the council's wider objective around driving up standards and conditions in the private rented sector. Having said that, some of the evidence offered in support of the selective licensing proposal is the same evidence used to justify the introduction of additional and a more limited selective licensing scheme in January 2015. The HQN report from 2013 highlights: "The wards with the most incidences of anti-social behaviour are concentrated in the south and east of the Borough. These wards have relatively high levels of</p>	<p>We have provided new evidence, commissioned further research and have continued to provide the evidence base to support our proposals. The HQN report is included as it presents the ASB evidence which is shown to be still linked to the PRS. In the current proposal we will distinguish the ASB evidence in relation to selective licensing. As indicated, the new evidence base study by Mayhew Harper Associates and our own study done with the assistance of our Business Intelligence Team have been undertaken and these research</p>	<p>Considered and evidence base updated</p>	<p>Evidence base</p>

	<p>private rented sector stock apart from Stonebridge which has a high concentration of social housing". In the council's report, more recent data on Police ASB calls, crime reporting, noise, fly-tipping and council recorded ASB show a similar pattern with most issues concentrated in the South and East of the Borough. We can find no breakdown to show how many of these crime and anti-social behaviour issues relate to the estimated 16,000 HMOs that already need licensing under the council's additional licensing scheme, but where few applications have yet been received.</p>	<p>reports form part of the information to be presented. These studies have taken a fresh look at the factors linked to the PRS in Brent and overall show positive links.</p>		
NALS	<p>To justify a second selective licensing scheme, the council should look more specifically at issues associated with single family rented properties that are outside the existing selective licensing area in Harlesden, Wembley Central and Willesden Green.</p>	<p>The evidence has been looked at for all areas of the borough. Our understanding is that the guidance suggests looking at evidence as it relates to the PRS and not just in relation to single family households. However we have provided an extensive analysis for single family houses in the evidence base reports.</p>	Considered	Evidence base
	<p>Further, we think the council should first evaluate the effectiveness of the current selective licensing scheme and the impact it is having on driving down levels of ASB within those three wards. Simply looking at how many properties have been licensed is, we think, of more limited value. We would like to see a more evidence based approach that is open to public scrutiny. For example, how many of the selectively licensed properties have been inspected, how many were found to have serious hazards that required intervention by the council and how does this compare to HMOs that have been licensed under the additional or</p>	<p>We have undertaken the review of the existing scheme but the data on the success of selective licensing is limited given the short period within which the scheme has been in force. However our further study indicates that ASB is still significant and persistent in the Harlesden, Willesden Green and Wembley Central wards. All properties have been given compliance checks where 1 yr.</p>	No change	Improving PRS standards

		<p>mandatory HMO licensing scheme?</p>	<p>licenses have been granted and before the licenses are renewed. Since January 2016, 530 properties have had these compliance checks ensuring that the deficiencies have been remedied. We have commissioned Future of London to carry out research on the impact of licensing on tenants. Our aim now is to build the capacity to undertake inspection of a sample of selectively licensed properties.</p>		
		<p>The council have indicated that one of their criteria for introducing borough wide selective licensing is poor housing conditions. To introduce a scheme on that basis, the council must intend to inspect those selectively licensed properties during the life of the scheme, which would be a significant resourcing issue. We think this further reinforces the case for a more targeted approach.</p>	<p>We have thought about this recommendation but consider that it is impractical to inspect all of the selectively licensed properties. Over 530 properties have has compliance checks. In the research carried out we have reviewed the property conditions in Brent looking at dilapidations, disrepair, HHSRS hazards etc.. We intend that the inspection programme which is evidence led and note that the statutory requirement to satisfy ourselves about the condition of the properties is not the same as under properties licensed under part 2. Nevertheless we will ensure that it is clear as to how we will improve the poor housing conditions, including the inspection regime to operate.</p>	<p>Considered</p>	<p>Administering the Scheme</p>

	<p>Regarding the migration, deprivation and crime criteria, government guidance makes clear that simply showing these issues exist does not suffice. The council must set out how they think such issues can be effectively addressed, what other courses of action have been considered and what the council hopes that the designation will achieve. The government guidance states: <i>“Only where there is no practical and beneficial alternative to a designation should a scheme be made”</i>. Source: Selective licensing in the private rented sector; a guide for local authorities; March 2015. Based on the evidence that has been published, we do not think the case has been proved to extend selective licensing borough wide.</p>	<p>We have shown the combination of factors affecting areas in Brent. Similarly to the poor property conditions, we will indicate how we intend to address these issues presented by the migration, deprivation and crime criteria.</p>	<p>Change. Indicate steps to show how the criteria will be improved</p>	<p>Criteria for introducing SLS</p>
	<p>Exploring opportunities for co-regulation Following our successful co-regulation partnership arrangement with Liverpool City Council, we would encourage Brent Council to consider adopting a similar approach in order to achieve more balanced and effective regulation of the private rented sector. Co-regulation can facilitate a light-touch approach to monitoring compliance amongst regulated letting agents, whilst freeing up local authority resources to tackle the minority of rogue landlords and agents that seek to evade their responsibilities and place their tenants' lives at risk. In describing this innovative co-regulation approach, a Liverpool City Council Councillor said: <i>“It is a win-win for everyone, because their members benefit from a reduced fee and we are able to target our resources at those landlords who we know aren't meeting the standards.”</i> We would be very happy to meet with Brent Council to explore options for developing a co-regulation model that helps to deliver better regulation of the private rented sector.</p>	<p>We have considered the co-regulation approach delivered by Home Safe Scheme Ltd., The report on our meeting with the scheme managers and their submission in response to our consultation are included in our consultation report.</p>	<p>Considered</p>	<p>Alternative proposal</p>

	<p>Licensing fees</p> <p>We recognise that the council need to charge a reasonable fee to cover the cost of administering and enforcing their licensing schemes. Overall, we think that the proposed application fee of £540 per property is less excessive than fees being charges in some other areas.</p> <p>However, we think there is scope to further improve the fee structure, whilst minimising the cost of compliance for regulated letting agents.</p> <p>We note that Brent Council propose to offer a £40 discount to accredited landlords, but offer no such discount to designated managing agents. We think is a missed opportunity that could help to encourage best practice in the local lettings industry. We would encourage the council to give this matter further thought and to implement an accreditation discount on a percentage basis, in the region of 20%. This would bring Brent into line with other London Boroughs such as Southwark and Islington. Further, we think the discount should be linked to the accreditation of landlords and letting agents, regardless of whether the licence holder or the designated manager is accredited. The discount should be offered to members of all accreditation schemes that have been approved by the GLA under London Rental Standard (LRS), such as the National Approved Letting Scheme. This in turn would help to encourage more effective management of private rented homes in the borough. This approach has already been adopted by Islington and Ealing Councils and we would strongly encourage Brent Council to follow best practice and do the same. We welcome the proposal to offer an early bird discounted fee of £340 to reward compliant landlords and agents and to aid the smooth implementation of the scheme. To make this work effectively, it is important that:</p> <ul style="list-style-type: none"> • The council's licence 	<p>The respondents recognise that our fees are already very low and we must consider other responses made in regard to the level of fees. The fees will be set so as to cover the cost of the function. However where we give concessions, we aim to provide a simple discount system. The current for LLAS members has allowed us to do so. We have had discussions NALs and the NLA and representation from The GLA regarding extending the discount. The proposed basic fee of £540.00 with a payable lower fee of £340 already allows for a considerable reduction to landlord who apply early. If the fee is decided upon, we intend to strongly promote the offer to give landlords and agents ample time to take advantage of the reduction.</p>	<p>No change</p>	<p>Licence fees</p>
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	<p>application process needs to be in place and fully operational before the council start to accept applications;</p> <ul style="list-style-type: none"> • Applicants should be given the opportunity to apply for a licence for at least three months prior to the start of the scheme; and • The council need to invest in extensive promotional activity, both within and outside the borough, throughout the pre-application period. NALS can assist in promoting the scheme amongst our members if the Council notify us once a scheme designation has been made. 			
	<p>Licence Conditions We do not support the proposal by Brent Council to place 22 standard licence conditions on each and every selective licence. We do not think it is necessary or appropriate to replicate existing statutory requirements as licence conditions. It is important to remember that breach of any licence condition is a criminal offence and so conditions must be appropriately worded and only cover situations over which the licence holder has control. We note that in the introduction, it incorrectly refers to each offence leading to a maximum fine of £5,000. The rules changed in 2015 and we would point out there is now no upper limit. Whilst we have not responded in detail on all the conditions, there are some particular issues we would highlight:</p>	<p>For clarity and consistency we propose ideally the same set of conditions that our landlords, tenants and licensing staff are already familiar with and we feel work effectively, but these will be updated to reflect regulatory changes e.g.. mandatory conditions and levels of fines. The maximum fine error is noted.</p>	<p>No change</p>	<p>Licence conditions</p>
	<p>Condition 4: It is already a requirement for any deposit to be protected by law and so we are unsure why this needs to be repeated. We would also point out that the requirement to provide prescribed information is within 30 days and not immediately, as indicated in the condition. The licence condition should not be more onerous than the legal requirements already in place.</p>	<p>There is a need to reinforce the requirement. It is clear that under the deposit scheme the landlord or letting agent must put the deposit in the scheme within 30 days of getting it. We will corrected or clarified this condition as necessary</p>	<p>Amend as necessary</p>	<p>Licence conditions</p>

	<p>Condition 10: It is unusual for a local authority to insist that the front door to every property rented to a single family is fitted with a thumb turn lock. This is only normally required in Houses in Multiple Occupation (HMOs). We would ask that this is requirement is deleted. It may also invalidate a landlord or tenants insurance policy by reducing home security.</p>	<p>The significant requirement is for a mortice lock to be fitted. The reference to 'thumb turn' seems of little significance and there is little justification for change</p>	<p>No change</p>	<p>Licence conditions</p>
	<p>Condition 13d. It is already a legal requirement for a landlord and/or agent to comply with a housing enforcement notice.</p>	<p>No change. Assist in ensuring that poor housing conditions are improved by a licensing provision.</p>	<p>No change</p>	<p>Licence conditions</p>
-	<p>Condition 14. The reference to compliance with the council's prescribed standards normally relates to HMOs as there are no prescribed standards for single family lets. As all HMOs are required to be licensed under the additional licensing scheme, this condition is not required</p>	<p>Justification for change/clarification - There are no adopted standards for single family households, where there maybe the existence of prescribed standards for private rented accommodation e.g. temporary accommodation or planning requirement. Where standards or guidance exists we will make clear and publish these on our website where possible.</p>	<p>No change</p>	<p>Licence conditions</p>
	<p>Condition 22. Whilst NALS licensed firms would always seek to facilitate any request for the council to inspect the property, we would point out that the tenant's right to quiet enjoyment means they are unable to guarantee a tenant will grant access on any particular day or time. As such, we would suggest the first sentence is amended to read 'The licence holder must take all reasonable steps to ensure access is granted when requested....'.</p> <p>We would encourage Brent Council to reflect on these comments and consider any necessary changes to the proposed licence conditions. All NALS' licensed firms are already</p>	<p>We accept that NALS agent may be compliant but there are many incidences of failed access for inspection, even after notification, including s239 notices have been issued. However we feel that it is necessary to retain this condition to apply to the whole sector generally.</p>	<p>No change</p>	<p>Licence conditions</p>

	<p>required to comply with defined standards of customer service and to ensure that properties are effectively managed. Any complaint from the landlord or tenant can already be independently investigated through a government-approved redress scheme.</p>			
	<p>Regulation of letting agents To achieve better regulation of the private rented sector and improve consumer protection, it is important that Brent Council take a holistic approach that extends far beyond the proposed licensing scheme. Since October 2014, it has been a requirement for all letting agents and property managers to belong to a government-approved redress scheme. In May 2015, a further requirement was introduced requiring agents to display all relevant landlord and tenant fees, the redress scheme they belong to and whether they belong to a client money protection scheme, both in-store and on the company's website. We would like to see Brent Council commit to proactive enforcement of these rules including, where appropriate, serving civil penalty notices, the income from which can help to fund the enforcement activity. By effectively regulating letting agents that operate within the borough, it will help to ensure the properties are more effectively managed and improve consumer protection. In June 2016, NALS published an Effective Enforcement Toolkit to assist local authorities with this task. The toolkit can be downloaded free of charge from the NALS website (www.nalscheme.co.uk).</p>	<p>The LA intends to develop a letting agent project to support the licensing function. We will work with our Trading Standards colleagues around related topics e.g. banning letting agent consultation. In addition we intend to implement the new provisions provided by the Housing and Planning Act 2016 as soon as possible when these provisions come into force.</p>	<p>Accepted</p>	<p>Enforcement</p>

<p>Email 15/12/16 15:03 written submissi on from Gavin Dick Policy Officer National Landlord s Associati on</p>	<p>Landlords have very limited authority to deal with matters related to anti-social behaviour (ASB), especially if it happens outside the curtilage of the property.</p>	<p>We believe that landlords have an important role to play in helping the Council and Police to deal with ASB. We have provided some steps which landlords could take. The House of Commons Parliamentary papers 2017 provides clear information on the responsibility for dealing with ASB.</p>	<p>Rejected</p>	<p>ASB</p>
	<p>The scheme will lead to a further displacement of problem tenants in Brent/London.</p>	<p>Partial schemes are more likely to lead to tenant being moved to wards where licensing is not in place. A whole borough scheme means that problem tenants can be tracked and that they (as we are mainly referring to single family households) are made to change their behaviour if they want to remain in the borough. The Council will undertake a study on the impact of licensing on tenants including any impact on homelessness and displacement.</p>	<p>No change</p>	<p>Impact on tenants</p>
	<p>The documentation provided fails to indicate that sufficient funding will be available to support the functions necessary to support licensing in cases involving rehousing, tenants with mental health issues and social inclusion.</p>	<p>We are undertaking a study to look at the impact of licensing on the displacement of tenants. Vulnerable tenants/families will have access to our Housing Needs and Well Being/Social Care teams. Our relationship with these Council colleagues is made easy as we sit within the same Community</p>	<p>Considered</p>	<p>Impact on tenants</p>

			Well Being Directorate. Future of London have provided an independent report on the impact of licensing on tenants. We will be addressing the recommendations and have drafted an action plan.		
		How will the Council prevent malicious ASB claims being made that could potentially result in tenants losing their tenancies?	In addition to the Council providing tenants with support and advice, the Council will continue to work with tenants support agencies especially those operating in BRENT e.g. Advice4Renters, SSP Law, Shelter UK, and the CAB. We would stress that as we already have a Selective Licensing Scheme in place, these connections are already set up.	Considered	Impact on tenants
		Selective licensing is not a solution in itself – it does not tackle sub-letting or criminals.	We do not view sub-letting as an offence. Licensing requires the landlord to take steps to effectively manage the property, including who occupies the property. The licence holder is required to ask for tenant references, right to rent checks, issue tenancy agreements and to undertake periodic inspections. We will consider the defence of "reasonable excuse" in deciding the most appropriate enforcement action to take in respect of an offence.	No change	Enforcement
		But to extend the scheme Borough wide we believe is unjustified.	We have reviewed our evidence base for extending licensing and this plus the balance of the consultation	Evidence base updated	Scheme Designation

			responses supports designation of all the boroughs in Brent		
		The NLA believes that any regulation of the private rented sector needs to be balanced and that additional regulatory burdens should focus on increasing the professionalism of landlords, the quality of the private rented stock and driving out the criminal landlords who blight the sector. These should be the shared objectives of all the parties involved to facilitate the best possible outcomes for landlords and tenants alike and, as such, good practice should be recognised and encouraged, in addition to the required focus on enforcement activity. This is not the case here.	Our scheme proposes to work with landlords. We have introduced a landlords newsletter and promote landlord accreditation. Licence holders and managing agents are agreeing to be bound by our licence conditions. The proposal indicated that compliance checks and enforcement inspections will be undertaken.	Rejected	Support for landlords
		In addition, the proposal does not take into account rent to rent or those that exploit people (tenants and landlords), as criminals will always play the system. For instance, there is no provision for those landlords who have legally rented out a property that is then illegally sublet. The Council is not allocating resources to tackle the problems that criminals will cause, where landlords are often victims just as much as tenants are.	Currently advice is given where sub-letting without the landlord consent is discovered and reported to us. We have given advice in our Landlord's Newsletter. In appropriate cases we will accept an application for a Temporary Exemption Notice (TENs) for licensing to allow landlords to take steps to deal with the illegal subletting. Tenants affected are referred to agencies for advice.	No change	Support for landlords
		However, in the present case, the Council is saying that the scheme can be delivered within the fees raised by the scheme, but this has been shown across the country not to work. Therefore, unless the Council is willing to allocate sufficient resources, we believe that the scheme cannot deliver what it hopes to achieve. This is a gross misrepresentation to the tenants, the community and to the landlords. In the case of a funding shortfall, the introduction of the scheme will undoubtedly have an impact on other Council	Licensing brings together many Council services to work to address the various problems caused by the private rented sector. However we are committed to working strategically as part of an overall approach. It is clear that we can only charge for certain activities and will set a fee structure and	Change. Present detailed fee breakdown	Financial Implications

	services.	keep this under review to ensure that the scheme is effectively resourced without burdening good landlords or the general ratepayer with additional costs. Enforcement costs can be covered by such methods fixed penalties, Rent repayment orders, Proceeds of Crime, Work in Default and prosecution costs awarded.		
	Landlords are usually not experienced in social care and do not have the professional capacity that would allow them to be able to resolve tenants' mental health issues or drug and alcohol dependency. If there are allegations about a tenant causing problems (e.g. ASB, noise nuisance), even if the tenant has the above issues, a landlord ending the tenancy will have dispatched their obligations under the discretionary licensing scheme. However, in reality, this just moves the problems around Brent, but does not actually help the tenant, who could even become lost within the system. There is no obligation within Selective Licensing for the landlord to solve the ASB allegation; rather, a landlord has a tenancy agreement with the tenant and this is the only thing they can legally enforce.	The condition 6 proposal set out some actions which landlords must take to address ASB. We accept that where tenants have mental health issues that we must take this into consideration and additional support may be needed. We will engage with voluntary groups to provide assistance to ourselves, landlords and the tenants. The organisation Justlife is something to look into. Also see response at point 52 above	No change	Support for landlords
	Brent Council has many existing powers. Section 57 (4) of the Housing Act 2004 states that a local authority "must not make a particular designation ... unless (a) they have considered whether there are any other courses of action available to them ... that might provide an effective method of dealing with the problem or problems in question". The use of these powers, which are listed below, by the Council shows that the Council already has powers that can be used to rectify the problems and, hence, the ability to tackle many of the issues that they	In terms of selective licensing the council has considered the requirements of s81(4) which similarly reflects the requirements of s57(4). Our evidence includes the records of reports and interventions by the Council and Police to deal with ASB occurrences. Datasets used includes complaints of poor property	Change. Detailed information provided in reports	Legal Implications

	<p>wish to overcome in all parts of Brent: e.g. various Orders, Injunctions, Notices to deal with ASB, properties and dumped waste:</p> <p>Could the Council also provide a breakdown of the number of times these orders and powers have been discharged across Brent and in the area that the Council proposes to designate for selective licensing?</p>	<p>conditions etc. We will include in our report particular paragraphs to indicate that s81(4) has been addressed.</p>		
	<p>Landlords outline to tenants at the start of the tenancy their obligations in relation to noise, just as they do with waste and what they have to do to comply with the relevant laws and with a view to respecting their neighbours. The landlord can only manage a tenant based on their contract for living in the rented property, not for activities in the street or in neighbouring streets. etc</p>	<p>We are looking at ASB caused by occupiers of or visitors to their rented property. Many ASB activities are evident outside the property e.g. litter, street alcohol drinking, motor vehicle crime and prostitution. This is really about the behaviour of the occupier or visitor and we are seeking that landlords work with their tenants, the Council and Police to help to solve the problems. Prompt and effective action by landlords could help tackle many problems at an early stage.</p>	<p>No change</p>	<p>ASB</p>
	<p>The risk of introducing licensing is likely to increase the costs for those renting, along with not resolving the problems that the Council wishes to resolve, and likely moving the issue around the Borough/London. The issues are thus not fully dealt with but instead are displaced to new landlords. If Brent were to take a more erudite approach with regard to nuisance issues and instead developed a separate policy to tackle criminal landlords, this would be more applicable and more likely to result in resolving many of the issues.</p>	<p>The licence fee is designed to cover the cost of administration and to be as low as possible. Calculated over the 5 years it represents a relatively small cost to landlords. Fees payments may be recovered by landlords as legitimate expenses. Issues such as poor property conditions, safety standards and poor management are resolved. Licensing provides a joint up approach to dealing with the PRS issues in Brent.</p>	<p>Considered. Draw up a separate licensing enforcement policy</p>	<p>Tackling criminal landlords</p>

	<p>One of the dangers of the proposed Selective Licensing scheme is that the costs will be passed on to tenants, thus increasing the costs for those who rent in Brent, along with increasing the Council's costs. The increasing costs to residents in Brent would particularly hit hard the most vulnerable and least able to tolerate a marginal increase in their cost of living. Also, the Council has failed to explain that, as well as the Council's costs for the licence, the landlords' costs will likely be covered by tenants too, thus further increasing the rents. The failure to explain this shows a lack of understanding of how the private rented sector works.</p>	<p>Fee representation considered and already covered in earlier responses.</p>	<p>Considered.</p>	<p>Licence fees</p>
	<p>Areas that have been subject to the introduction of selective licensing have seen lenders withdraw mortgage products, thereby reducing the options to landlords reliant on finance. Downstream, this increases landlords' overheads and, subsequently, the costs for tenants rise.</p>	<p>Our research has seen a significant growth in the PRS in Brent between our 2014 and recent estimates. This may indicate that mortgage products are available although we are not in a position to refute the point made about the difficulty or cost in signing up to a preferred lender or product.</p>	<p>Noted</p>	<p>Financial Implications</p>
	<p>Brent Council, by proposing the introduction of licensing, is implying that there are social problems that could deter investment in the area. However, there is no acknowledgement of the impact this stigmatisation of discretionary licensing would likely have on the effected locality in the consultation. This should be explored and detailed in the evidence case supporting this application. The NLA would assert that the failure to provide such information is an indication of a substandard and ultimately superficial consultation exercise.</p>	<p>We are concerned about the conditions in our PRS and are committed to arresting the decline in the reputation of the PRS especially in the worst affected areas. The Equalities assessment takes into account the socio-economic impact and finds that overall this will not negatively impact on the local area. We have also looked at the incidences of deprivation in Brent to provide substance to our proposals.</p>	<p>No change</p>	<p>Socio-economic impact</p>

	What consideration has the Council taken in relation to potential homelessness when tenants cannot access the private rented sector?	We have considered homelessness and address this in the proposal document. A detailed study has been undertaken on the impact of licensing on tenants.	No change	Impact on tenants
	Often when tenants near the end of their contract/tenancy and they are in the process of moving out, they will dispose of excess waste by a variety of methods, which often includes putting it out on the street for the Council to collect. A waste strategy for the collection of excess waste at the end of tenancies needs to be considered by local authorities with a large number of private rented sector properties in areas. This is made worse when councils do not allow landlords to access municipal waste collection points. The NLA would be willing to work with the Council to help them develop this strategy.	The council has a strategy in place to deal with waste and illegal dumping. We have communicated to landlords how the council are able to assist with collecting bulk domestic waste and will endeavour that the waste strategy is reflected and that measures are reconciled.	No change	Strategic approach
	The social housing sector has made many efforts to remove problem tenants (2/3rd of all court evictions are from the social sector). How does the Council expect landlords to solve the issues of these tenants when the professional sector has so far failed to do so? Many of the tenants that have been removed from the social sector are now living in the private rented sector without any of the support they might otherwise have received in the social sector.	It is clear that landlords are seeking help with problem tenants. We need to be sure how we will address this issue including advice to tenants, mediation, rent arrears, s21 possession claims, etc.,	Considered	Support for landlords
	The laws that the private rented sector has to comply with can be easily misunderstood. A landlord is expected to give the tenant a "quiet enjoyment" of the property, and failure to do so could result in a harassment case being brought against the landlord.		Noted	
	The introduction of licensing is proposed to tackle specific issues, of which many of these are tenant related and not to do with the property/landlord. Thus, the challenge is for local authorities to work with all the people involved and not to just blame one group – landlords.	The steps we propose include other agencies and stakeholders and aims to work collectively. Rather than blaming landlords, we do feel that landlords have	Noted	Strategic approach

			an important role to play and for various reasons many are not doing so. The setting up of a landlords focus group and further advances with landlord training will help with our landlord engagement.		
		The NLA would also argue that a problem encompassing a few poorly managed and/or maintained properties would not be appropriately tackled by a licensing scheme, which is not proportional to the problem. In many situations, the Council should consider Enforcement Notices and Management Orders. The use of such orders could deliver results immediately – so why instead does the Council wish to do this over five years through a licensing scheme? Adopting a targeted approach on a street-by-street approach, targeting the specific issues and working in a joined-up fashion with other relevant agencies, such as the Council, community groups, tenants and landlords, would have a much greater impact.	Licensing will assist us in targeting poorly managed and badly maintained properties. Street surveys will enable us to target unlicensed properties. Where enforcement action is needed notices and orders will be considered and used in accordance with our enforcement policy and the regulators code.	Considered	Alternative proposals
		The NLA agrees that some landlords, most often due to ignorance rather than criminal intent, do not use their powers to manage their properties effectively. A more appropriate response therefore would be to identify issues and to assist landlords. This could allow Brent Council to focus on targeting the criminal landlords – where a joint approach is required.	Since the introduction of additional licensing in 2014 we have created a database of over 3000 licensed landlords. We estimate that there are more than 10,000 landlords and agents operating in Brent and as such the voluntary engagement is poor. Widening licensing will identify our landlord community and allow us to engage with good landlords to educate and assist them on relevant issues. Resources will then target criminal landlords	Noted	Enforcement

	<p>The NLA would also like to see Brent Council develop a strategy that also included action against any tenants that are persistent offenders. These measures represent a targeted approach to specific issues, rather than a blanket-licensing scheme that would adversely affect all landlords and tenants alike while still leaving criminals able to operate under the radar.</p>	<p>Our joined up approach links to other strategies e.g. ASB</p>	<p>Considered</p>	<p>Strategic approach</p>
	<p>Many of the problems are caused by mental health and drink and drug issues, these are issues that landlords cannot resolve and are issues that will require additional resources from the Council. You fail to provide what additional services will be provided in the area for mental health. This will have an impact on adult social care budgets from the County Council. How much money has been allocated from the County to meet this, especially as this budget is under pressure already?</p>	<p>See points 53 and 60 above</p>	<p>Noted</p>	<p>Financial implications</p>
	<p>The Council should consider alternative schemes, such as the Home Safe Scheme in Doncaster and SEAL in Southend. Both schemes offer alternatives that the Council has not reviewed or presented in the consultation.</p>	<p>We have considered co-regulation having met with Home safe Scheme Ltd. Their submission is included in the formal consultation. We have written to the Southern Landlords Association as they administer the Southend Alliance and have communicated with Doncaster MBC regarding their scheme performance.</p>	<p>Considered</p>	<p>Alternative proposals</p>
	<p>In relation to ASB reduction and the authority a landlord has to tackle such activity within their properties, it should be pointed out that landlords and agents can only enforce a contract. They cannot manage behaviour (ref: House of Commons briefing note SN/SP 264, paragraph 1.1). In most circumstances, the only remedy available to landlords confronted with cases of serious ASB in one of their properties will be to seek vacant possession,</p>	<p>We believe that there are other measures landlords could use to address ASB and in the vicinity of privately rented properties and have considered these as part of the reason for proposing selective licensing</p>	<p>No change</p>	<p>ASB</p>

	and in many instances, they will need to serve a Section 21 notice ...			
	It is also worrying how little reference has been made to the economic impact on the local community from the likely increase in the costs of housing provision. We wish to understand how the Council believes increasing said costs could benefit those on fixed incomes. The logic of this assertion is not clearly explained and will arguably lead to incorrect conclusions on the part of those stakeholders relying on the Council to inform their input into this consultation.	The Council has carried out the Impact assessment and a further study on the impact on tenants. The findings would indicate that the overall benefits will outweigh any negative impacts. An action plan is to be considered to mitigate negative impacts and to promote the positive benefits of the scheme if it is introduced.	Considered	Socio-economic impact
	Clarification on the Council's policy in relation to helping a landlord when a Section 21 notice is served is required within the proposed Selective Licensing scheme. It would be useful if the Council could put in place a guidance document before the introduction of the scheme to outline the Council's position regarding helping landlords remove tenants who are causing ASB.	We will look to provide guidance and to signpost to where landlords can access relevant support. Our landlords newsletter will be used to provide messages on s21.	Considered	Support for landlords
	The NLA would like further explanation on how the Council will work with landlords to mitigate the issue of tenants leaving a property early but where they still have a tenancy contract.	We intend to set up a landlord focus group to consider such issues including abandonment. We will communicate the advice to landlords.	Considered	Support for landlords
	If a landlord faces challenges with a tenant, how will the Council help the landlord?	See point 74 above. In some circumstances the Council may be able to assist with mediation. Office documentation and witness statements can be provided upon request.	Noted	Support for landlords

<p>Emailed written submission: 16 December 2016 - 15:53; John Stewart, Policy Manager; Residential Landlords Association</p>	<p>The RLA also believes that the Council is premature on bringing forward proposals. The Housing and Planning Act 2016 will give local authorities substantial new powers to tackle breaches of housing legislation and drive the criminal operators from the sector. The council should wait until the impact of these new powers can be assessed before pressing on with more regulation in the form of selective licensing.</p>	<p>It is acknowledged that the Housing and Planning Act and other new measures relating to the PRS are being introduced and Brent will avail itself of these powers as soon as practicable. Brent believes that this is the right time to consider widening licensing as there are many advantages and economies. There may be delay in introducing and implementing these new provisions and some powers will not be introduced before October 2017. The assessment of these new powers is unlikely to happen before 2019. We will coordinate these powers with the licensing and enforcement powers with the Housing Act 2004.</p>	<p>Considered</p>	<p>Timing of proposals</p>
	<p>The RLA is opposed to the scheme and has a number of general objections to Licensing, which are attached as an appendix – RLA General Licensing Concerns. The RLA has several areas of concern in regards to selective licensing, namely:</p> <ul style="list-style-type: none"> i. Worrying trends are emerging in the case of discretionary licensing. Licensing entails a huge bureaucracy and much time, effort and expense is taken up in setting up and administering these schemes; rather than spending it on the ground and flushing out criminal landlords. ii. Increasingly, discretionary licensing is being misused to fund cash strapped housing enforcement services. The recent Westminster sex shop Court of Appeal (Hemming (t/a Simply Pleasure) Limited v Westminster City Council) has brought such 	<ul style="list-style-type: none"> i. The Selective licensing scheme is already in place in Brent ii. The Hemming-v-Westminster case has clarified the point on fees and charging for enforcement iii. The maximum period of the scheme is 5 years. Given the extent of the problems in the PRS we consider that this is a short period. iv/v. The proposed is relatively low and made less for landlords who make early voluntary applications and are eligible for discounts. If the cost is considered over the 5 year term the 	<p>Considered.</p>	<p>General opposition to licensing</p>

	<p>funding into question).</p> <p>iii. Discretionary licensing is not being used for its intended purpose of a short period of intensive care; rather it is being used by the back door to regulate the PRS.</p> <p>iv. The level of fees which are ultimately passed on to tenants to pay is a major worry so far as it affects landlords.</p> <p>v. Despite high fee levels local authorities still lack the will and resources to properly implement licensing.</p> <p>vi. Little has been done to improve property management. Opportunities to require training have been ignored. As always it has become an obsession with regard to physical standards with very detailed conditions being laid down. No action is taken against criminal landlords.</p> <p>vii. We believe that a significant number of landlords are still operating under the radar without being licensed.</p> <p>viii. As always it is the compliant landlord who is affected by the schemes. They pay the high fees involved but do not need regulation of this kind.</p> <p>ix. Licensing is not being used alongside regeneration or improvement of the relevant areas. Insufficient resources are being employed to improve the areas.</p> <p>x. Where areas are designated for selective licensing this highlights that they can be “sink” areas. This could well mean it would be harder to obtain a mortgage to buy a property in these areas.</p> <p>xi. Schemes are not laying down clear objectives to enable decisions to be made whether or not these have been achieved. Proper monitoring is not being put into place to see if schemes are successful or not.</p> <p>xii. There is little use of “fit and proper person” powers to exclude bad landlords.</p>	<p>annual amount is low and there should not be a need to pass this on to tenants.</p>	
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	<p>Licensing schemes rarely meet their objectives. Good landlords will apply for licences and, in all likelihood, pass the cost on to tenants in the form of increased rents, doing nothing to address affordability, while the worst landlords – the criminal operators – will simply ignore the scheme, as they do many other regulations.</p>	<p>Our observations from the 2 years since implementing selective licensing in 3 wards is that most properties are now licensed. There is no evidence that additional costs are passed on to tenants, and given the low costs of our fee, this is less likely to be necessary. In some cases money will need to be spent improving property conditions.</p>		
	<p>There is little evidence that licensing schemes improve housing standards. The focus of staff becomes the processing and issue of licences, while prosecutions centre on whether a property is licensed or not, rather than management standards and property conditions</p>	<p>A prerequisite of the scheme is that properties that are required to be licensed are licensed. Our issuing of 1-yr licences and undertaking compliance inspections have led to improved property standards and a reduction of health and safety hazards. Our model is to licence and thereafter to focus activities on compliance on those properties proactively and reactively, especially on those properties and landlords which present greatest concerns. We will balance the scheme activities in relation to need and our reasonably available resources.</p>	Noted	Improving housing standards
	<p>The Council already has the necessary tools to tackle poor housing management and conditions in the PRS. Rather than introduce a bureaucratic licensing scheme that will see staff time wasted processing applications, it should continue to direct its limited resources at effective enforcement activity.</p>	<p>The licensing scheme will bring together the wide range of tools provided and will present a coordinated platform within which the Council will operate.</p>	No change	Enforcement

	<p>Landlords, will become risk averse in terms of the tenants they let to. Tenant problems such as anti-social behaviour are impossible for the landlord to address alone and landlords will not wish to risk a breach of licensing conditions that may affect their ability to let properties elsewhere. Some may seek to evict already challenging tenants. This could mean additional costs to other council services, as they pick up the pieces created by the disruption to the lives of already vulnerable tenants. Likewise, if licensing costs are passed on to tenants in the form of rent increases, then some tenants may struggle, particularly those on benefits, affected by welfare reform and frozen housing allowances.</p>	<p>The intention is that there is more responsible renting by landlords and more that more support is given to tenants by landlords and agents. This will help in sustaining tenancies. We have looked at the impact of licensing on tenants if the scheme is introduced.</p>	<p>Considered</p>	<p>Impact on tenants</p>
	<p>The RLA does not believe Brent has made a robust case for borough-wide licensing. By the consultation paper's own admission, 'much of the private rented sector offers good accommodation for people who want to live in the Borough'. It is invidious that the majority of landlords, who provide good accommodation, should face increased costs through fees, whilst the criminal operators ignore licensing. Poor and unsafe accommodation should be tackled through better and targeted enforcement.</p>	<p>Some landlords are neglecting their properties and fail to properly manage their tenancies and this is reflecting badly on the whole sector in Brent. Licensing will help to create a level playing field and allow resources to identify and target our enforcement activities.</p>	<p>Considered</p>	<p>Evidence base</p>
	<p>The data maps showing the concentration of PRS housing suggest a number of ward should not be included: Dollis Hill; Kenton; Northwick Park; Queensbury; and Stonebridge. Even excluding these wards the scheme will require the consent of the Secretary of State.</p>	<p>We have looked carefully at the evidence at ward level. In some wards the evidence is not as strong as in others. We have considered the responses to our consultation and together with the evidence collected there is overall support for extending licensing borough wide.</p>	<p>Considered.</p>	<p>Scheme designation</p>

	<p>Much of the Brent case relies on tackling anti-social behaviour. There are limits to what landlords can do to tackle ASB caused by tenants. The council already uses local joint action groups and cross-departmental and multi-agency working such as this is more effective in tackling ASB, maintaining tenancies, housing condition and management standards.</p>	<p>This statement supports the proposals.</p>	<p>Accepted</p>	<p>ASB</p>
	<p>In fact, the report concedes that ASB is falling across the Borough. However, the highest incidences of ASB in Brent are to be found in wards where selective licensing has been in operation for almost two years. This suggests that selective licensing is failing to deliver the desired outcome.</p>	<p>The current study has built on the previous research and has collected much more evidence of ASB incidences. We would also suggest that improved reporting and monitoring of ASB may be part of the explanation for this finding.</p>	<p>Accepted</p>	<p>ASB</p>
	<p>The Council also admits that the current borough-wide additional licensing of HMOs is failing. The report acknowledges that “the large number of HMOs whose owners have neglected to apply for licences”. If the council cannot adequately enforce a borough-wide additional licensing scheme, then there must be doubt about its ability to enforce a borough-wide selective scheme encompassing tens of thousands more properties.</p>	<p>The applications and number of selective licences has been successful. The identification and enforcement of HMOs has proven to be a greater challenge where additional HMO licensing has been introduced. We have significantly improved the number of HMO inspections and prosecutions over the last two years</p>	<p>Noted</p>	<p>HMO licensing</p>
	<p>The council also committed to review the current selective licensing schemes annually. However, the assessment of these schemes do not form part of the consultation.</p>	<p>Review meetings have been undertaken e.g. HQN led review, Brent member scrutiny. The summary of these reviews will be included in the cabinet report.</p>	<p>Accepted</p>	<p>Review of existing scheme</p>
	<p>Looking at the specifics of the scheme, should the council decide to proceed, we welcome the consideration of discounted fees. However, we believe the discount for accredited landlords does not provide sufficient incentive for landlords to become accredited. A more substantial</p>	<p>We will have set the fee structure to ensure that the scheme costs are covered over the 5 year life of the scheme and to be as low as possible for good landlords.</p>	<p>Considered. Present fee structure for all licence types</p>	<p>Licence fees</p>

		discount would attract greater uptake of accreditation.			
		There is no mention of an alternative to online application. The RLA believes a paper registration option should be available.	Brent already has a successful electronic process. Paper systems are not in line with the Council's Corporate business strategy.	Rejected	Strategic Approach
		With regard to the licensing conditions, the scheme appears to require landlords to force tenants to disclose unspent convictions (6a). This can only be done through a CRB or similar check. Forcing a third party to require such a check – an enforced subject access request - in order to gain a tenancy is a criminal offence, under s56 of the Data Protection Act. This condition should be removed.	Regarding condition 6a, we will take legal advice on this and take appropriate action	Considered	Licence conditions
		There are alternatives to licensing. The RLA supports a system of self-regulation for landlords whereby compliant landlords join a co-regulation scheme which deals with standards and complaints in the first instance, while those outside the scheme remain under the scope of local authority enforcement.	See point 76 above	Considered	Alternative proposals
		We also support the use of the council tax registration process to identify private rented properties and landlords. Unlike licensing, this does not require self-identification by landlords, making it harder for so-called rogues to operate under the radar.	At present there is no requirement for property owners to state the tenure as part of the council tax register and for the present local authorities are unlikely to be allowed this provision. However we are pleased that we now have access to the tenancy deposit registers and have requested this data from the 3 Government approved schemes. We will continue to use a combination of available databases to identify private rented properties.	Noted	Alternative proposals

<p>Harry Ulaeto [mailto:Harry.Ulaeto@thehomesafescheme.org.uk] Sent: 15 December 2016 15:37 The Home Safe Scheme Ltd</p>	<p>We agree, from the information provided by Brent Council in the course of their Consultation, that there is a problem with some private rented sector properties in the area and commend them for having taken action to deal with this problem but would like, in the context of extending licensing further, to propose an alternative (and innovative) solution to that problem. Unlike many other landlord groups or associations, we are in full agreement that the current system in the private rented sector is failing in many areas nationally, that the private rental market is in a state of flux and that there are deep rooted issues throughout the sector that need to be addressed by all stakeholders.</p>	<p>Support for licensing . We have met formally with Home Safe Ltd and have discussed their proposals with a view to looking into how co-regulation could work alongside licensing in Brent.</p>	<p>Considered</p>	<p>Strategic Approach</p>
	<p>Our position, however, is that Selective Licensing, in its raw form, is ineffective but that it can be quantifiably effective if deployed via the mechanism of “Co-regulation” as defined by The Home Safe Scheme partnerships with Doncaster and West Lindsey Councils.</p>	<p>See responses at 76 above</p>	<p>Considered</p>	<p>Alternative proposals</p>
	<p>Home Safe’s alternative scheme will enable Brent Council to use their existing powers and resources more effectively and in a more targeted manner allowing them to focus those resources directly against the willingly bad, un-cooperative and non-complying landlords.</p>	<p>See point 76 above</p>	<p>Considered</p>	<p>Alternative proposals</p>