

Report to: EXECUTIVE CABINET

Date: 18 December 2019

Executive Member: Councillor Gerald P Cooney, Executive Member (Housing, Planning and Employment)

Reporting Officer: Ian Saxon, Director of Operations and Neighbourhoods
Jayne Traverse, Director of Growth

Subject: IMPROVING STANDARDS IN THE PRIVATE RENTED SECTOR

Report Summary: The Private Rented Sector (PRS) is growing in Tameside. More families and older people are now renting privately - in part due to a lack of affordable housing and the difficulty of acquiring mortgage finance.

Most homes in the private rented sector in Tameside are of a good quality. However, at the lower end of the market there is growing evidence that poor quality standards are having a significant impact on the physical and mental wellbeing of our residents.

This report is in four parts:

- 1) The scale and significance of poor quality private rented housing in Tameside.
- 2) The impact of poor quality private rented sector housing on population health, community safety and homelessness.
- 3) The criteria, benefits, limitations, cost and processes involved in selective licensing.
- 4) The potential introduction of selective licensing in Tameside. Tameside.

Recommendations:

- 1) That Board recommends a whole-system approach to the PRS incorporating a range of community-based measures as outlined in Section 4.
- 2) That Board recommends to Council the approval of £80k to support the project initiation stage.
- 3) That Board agrees to grant delegated authority to the Director of Growth in consultation with the Director of Operations and Neighbourhoods to incur and spend said funds.

Corporate Plan: This report on improving standards in the PRS is one element of a broader approach to housing in Tameside, one element of a comprehensive Corporate Housing Strategy currently in development.

Selective licensing can be an effective tool to improve housing standards in deprived communities. However, it must be introduced to reinforce existing community-based-measures already being delivered.

The recommended project would look at the feasibility of delivering selective licensing in line with a number of core corporate priorities. In particular:

- A place-based approach that redefines services and places with individuals, families and communities at the heart

- A stronger prioritisation of well-being, prevention and early intervention to improve population health.
- Behaviour change in our communities that builds independence and supports residents to be in control
- An evidence-led understanding of risk and impact to ensure the right intervention at the right time

Policy Implications:

There are no policy implications at this stage. Improving the private rented sector is a core priority for the Greater Manchester Strategy 2019-2024 (published June 2019) and the related Tameside Housing Strategy, (currently in development).

Financial Implications:

(Authorised by the statutory Section 151 Officer & Chief Finance Officer)

This report is requesting an initial ask of £80k for research and consultation activities and the corresponding staffing. These costs will be split between 19/20 and 20/21; there is currently no budget in the service for this but the element relating to 20/21 will be identified as a pressure within the forthcoming budget process.

Following the consultation, if it is proposed to go ahead with implementation, the costs of the project will need to be fully evaluated. These should then be considered as part of the decision to implement the scheme.

Legal Implications:

(Authorised by the Borough Solicitor)

There is no budget for the costs set out in this report for resource/capacity to undertake the assessment/approach of a strategy to tackle this issue. Accordingly as a priority of the Council this will need to be addressed at the budget setting.

Risk Management:

Addressed in Section 7 of this report.

Access to information:

The background papers relating to this report can be inspected by contacting Jack Gould, Project Manager - Housing Growth, Investment and Development, Growth



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1. INTRODUCTION

Foremost among our many priorities is pushing ahead with my commitment to improve the private rented sector in Tameside... This is an idea whose time has come. Housing, especially in the private rented sector, is at the heart of the economic, social and environmental infrastructure of the borough. Housing is the building block of sustainable communities. Housing is a key factor in making sure that everybody in Tameside can lead a healthy and happy life.

Executive Leader Brenda Warrington, Speech to Full Council (21 May 2018)

- 1.1 Good quality housing is a vital part of creating and sustaining neighbourhoods that can support wider social change, inclusive economic growth and community wellbeing.
- 1.2 Poor quality housing in the Private Rented Sector (PRS) has a massive impact on public health, particularly the physical and mental health of children, older people, and those recovering from long-term illnesses. Investing time and resources into improving housing conditions has medium- and long-term benefits in shifting health and social care costs away from crisis demand and toward early intervention and prevention.
- 1.3 Selective licensing is one of the mechanisms by which standards can be improved in the private rented sector. Careful planning is crucial for success and selective licensing must be implemented as part of a wider suite of community-based measures.
- 1.4 This report recommends a project be undertaken to assess the potential introduction of selective licensing in designated areas in Tameside. A project plan is outlined, with £80k required to undertake the preliminary work.

2. THE PRIVATE RENTED SECTOR IN TAMESIDE

- 2.1 Declining home ownership and a lack of social rented homes are two major factors in the growth Private Rented Sector (PRS) in Tameside over the past two decades. More tenants now rent privately than in previous generations, and for longer. This includes families with dependent children, older people, recent migrants and those with long-term sickness or disability.
- 2.2 In 2017, 14.2% of properties were privately rented in Tameside, accommodating 39,778 people across 14,916 households. In some neighbourhoods PRS is a much bigger part of the local housing market.
- 2.3 Almost half the properties in the private rented sector are Victorian terraces built over a century ago. These pre-1919 terraces are especially common at the lower end of the market.
- 2.4 21% of jobs in Tameside are low paid and a large part of the private housing market tends to accommodate these lower income households, sometimes partly or wholly paid for through Housing Benefit/Universal Credit. Eight out of ten households that rent privately earn less than £500 each week, with half of these receiving less than £300.
- 2.5 The recent English Housing Survey estimated that one third of properties let at lower rent levels in England fail the Decent Homes Standard. Conditions in some deprived areas in Tameside may be worse than national estimates, given the age and lack of investment in stock.
- 2.6 The main reason for failing to meet the DHS is the presence of Category 1 hazards, such as mould or damp, inadequate facilities for personal hygiene, and electrical hazards. A

Category 1 hazard is one that constitutes a severe or immediate risk to residents' health and safety.

- 2.7 In 2017 one in five of households in Tameside's PRS were in some form of housing need. This included overcrowding, homes in major disrepair or multiple households sharing facilities like kitchens and toilets.
- 2.8 In 2018 a landmark review of the private rented sector highlighted how poor property conditions and changes to welfare reform are creating a 'slum tenure' at the bottom end of the market, as more tenants are unable to afford to meet their current rent levels or find accommodation without the help of statutory or third sector agencies.
- 2.9 Poor management can often be the result of ignorance rather than malice. This includes failing to meet requirements to protect a deposit; not meeting maintenance and repairs requests in a timely way; or poorly received rent collection. More serious practice includes harassment or entering a tenant's home without permission.

3. THE IMPACT OF POOR QUALITY PRS ON TENANTS

When we first moved in the roof leaked, and that was leaking for about a year before [the landlord] fixed it. The little girl's room, the wall fell off... when [the landlord] eventually got it fixed, they literally just told them to slap some plaster in the holes, and now when it's raining you can just see it getting wet again

PRS resident in Salford

Impact on Children

- 3.1 In Tameside children make up one third of all the people living in the private rented sector. Stability and security at home is crucial to children's education, health and wellbeing.
- 3.2 Poor property conditions experienced from birth and over a long time have long-term impacts. Poor thermal comfort has a high impact on younger children's physical health, and on the mental health of both teenagers and adults.
- 3.3 Where the housing does not meet the bedroom standard, there is less room to play, less quiet space for homework and less privacy leading to issues at all stages of child development. Overcrowding is also more likely to lead to relationship tensions within the family, causing stress and anxiety.

Older People

- 3.4 Poor housing is likely to carry more serious impacts for older people. For example, respiratory conditions attributed to damp, condensation and mould, poor thermal insulation, or trips and falls associated with disrepair. It has been estimated that the annual cost of falls to the NHS amounts to £2.3 billion nationally. In addition older people are more likely to feel anxious with regard to burglary, as a consequence of poorly-fitting doors and windows.

Long Term Sickness

- 3.5 Recovery from long-term sickness may be more protracted and uncertain if property conditions are poor. During that period, a temporary reliance on benefit should not put a tenancy at risk.

Disability

- 3.6 PRS properties are not always adaptable for people with disabilities. As noted above, there is a higher proportion of older terraced housing in the PRS. These properties are sometimes narrow and are more expensive to convert to accommodate wheelchairs and residents with reduced mobility.

Mental Health

- 3.7 Many of the problems associated with living in poor PRS housing exacerbate mental health problems. In 2017, research by Shelter found that one in five adults in England had experienced mental health issues due to housing problems. Anxiety, depression and other mental health conditions can be exacerbated by living in insecure, poor quality accommodation which has an impact on self-esteem and on feelings of personal security.

Community Safety

- 3.8 In order for GMP to respond to hidden victims, policing must focus on risk, harm, and vulnerability often encompassing things that take place behind closed doors, for example child sexual exploitation, human trafficking and modern day slavery.

Homelessness and Destitution

- 3.9 Households that rely on welfare payments to meet the cost of the rent face difficulties in the private rented sector and are extremely vulnerable. 25 per cent of recipients of Jobseekers' Allowance between 2011 and 2015 had experienced at least one sanction. Uncertainty falls heaviest on those in the private rented sector, which places them at increased risk of homelessness.
- 3.10 Benefit recipients who are at risk of losing their tenancy are also at increased risk of being unable to secure a replacement home. Many landlords are increasingly unwilling to let to benefit claimants. Households reliant on benefits are less likely to be able to afford the rent in advance and deposits required to set up a new tenancy, or the costs associated with moving.

4. WHAT CAN BE DONE TO IMPROVE STANDARDS IN LOW-QUALITY PRS?

- 4.1 There are several 'hard' and 'soft' measures the Council can introduce to improve standards in the PRS. Soft measures included information and advice on webpages, a landlord forum to improve partnerships with the sector, and various other incentives to encourage good landlord practices. Harder measures are areas that can improve the PRS are compulsory i.e. they do not rely on the market and the good will of landlords to raise standards. A combination of approaches is advisable.
- 4.2 Policy options discussed in this paper, centred on improving standards in the PRS, are one element of a broader approach to housing in Tameside, being brought forward as a part of a comprehensive Housing Strategy.

The Greater Manchester Housing Strategy and the Private Rented Sector

- 4.3 There are a number of initiatives aimed at improving standards in the private rented sector at a city-region level following the adoption of the Greater Manchester Housing Strategy by the 10 Greater Manchester local authorities in June 2019.
- 4.4 Priority A2 of the Greater Manchester Housing Strategy is 'making a positive difference to the lives of tenants in the private rented sector. The major workstreams and indicative milestones in 2019/2020 are listed in the table below:

	2019	2020	
	July-Dec	Jan-Jun	July-Dec
GM Private Rented Sector Partnership Bring stakeholders together to devise solutions to challenges faced by tenants, landlords and the sector as a whole	Partnership established, with Terms of reference and work programme agreed by December 2020		

Good Landlord Scheme To encourage and support landlords to provide a safe, decent and secure home to their tenants	GLS development bid submitted to Fair Housing Futures fund	Model for GLS developed by PRS partnership	GLS launched
Rogue Landlord Hub Consistent, coordinated approach to enforcement of standards in the PRS across Greater Manchester by districts and key partner agencies, including targeted interventions against rogue landlords	Frontline officer training delivered	Suite of policy/procedures for rogue landlord interventions developed	
	Information sharing protocol developed		
Ethical Lettings Agency By 2021 bring additional 800 units in the private sector to applicants who are homeless, threatened with homelessness or on social housing registers.	'Let us' work programme established		
	ELA bid submitted to Fair Housing Futures fund		

The Liverpool Model

4.5 In January 2014, Liverpool City Council outlined a 'ten point pledge' to improve standards in the private rented sector. The twin aims of this offer were to:

- a) Build positive engagement with landlords that recognises their role as housing providers and investors
- b) Establish a robust stance against landlords whose standards fall below satisfactory standards

Although the capacity and scope of Liverpool's offer was significantly larger than this paper proposes for Tameside, the Ten Point Pledge offers helpful guidance for the Council in developing a holistic, borough wide offer for the PRS in Tameside.

4.6 The table below lists Liverpool City Council's ten point pledge:

Pledge	Detail
The Liverpool Standard	<ul style="list-style-type: none"> • The Healthy Home Standard is an aspirational level for property conditions and management practices designed to raise professional standards across Liverpool." • Exceeds statutory requirements • A benchmark that provides a stepping stone to higher standards • Developed following consultation with landlords
Voluntary Landlord Registration	<ul style="list-style-type: none"> • Basic information provided by landlords regarding their business address and the properties they manage • Enables ease of contact with landlords if there are problems with their properties and to include them in mail shots about matters of interest, for example future dates of the Private Landlords Forum
Landlord Accreditation Scheme	<ul style="list-style-type: none"> • Citywide Landlord Accreditation and Safety Scheme (CLASS) • Originally established in 2005, the re-launched accreditation scheme was part of a wider marketing campaign outlining the

	10 point pledge.
Incentives for Good Landlords	<ul style="list-style-type: none"> • Landlord Development Days held • Advertisement of vacant properties on Property Pool Plus, a sub-regional Choice Based Lettings scheme • Access to Tenancy Bond scheme • Property and street scene improvements in our housing renewal areas • Green Deal/Energy Company Obligation • Tenancy referencing scheme • Access to repairs contractors
'Know Your Landlord' Service	<ul style="list-style-type: none"> • To be displayed on the PRS web pages • Easy reference – are landlords registered, accredited, member of a landlords association and have they been prosecuted? • General advice for tenants seeking accommodation
Whistleblower Freephone Service	<ul style="list-style-type: none"> • Freephone number where members of the public can make complaints anonymously • Linked directly to a 'rogue landlord hit squad'
Landlords Webpages	<ul style="list-style-type: none"> • Specific pages on the Council's website relating to the PRS • Details of the Private Landlords Forum; agendas/minutes of Private Landlords Advisory Panel; news items; and general information
Enforcement Hit Squad	A specialist 'paid response team' was established, with joint working with other agencies, following up on Freephone enquiries.
Selective Licensing	The potential for introducing selective licensing in Tameside is discussed at length in the following section.

4.7 The Council is engaged in building existing relationships with private landlords around a number of the themes highlighted by the Liverpool model, in addition to the Greater Manchester work streams noted in 4.4.

4.8 This includes developing a program of member development sessions with the National Landlords Association (NLA) for 2020/21; to promote and share best practice and encourage ethical investment opportunities that meet the Council's strategic ambitions, for example town centre regeneration.

5. THE RATIONALE FOR SELECTIVE LICENSING

Selective licensing can be an effective policy tool with many schemes achieving demonstrable outcomes... however... when implemented in isolation the effectiveness of selective licensing is often limited

DHCLG, An Independent Review of the Use and Effectiveness of Selective Licensing

5.1 The Housing Act 2004 gives the Council the power to introduce the licensing of private homes within a designated area based on certain conditions. These conditions were extended in 2015 and include:

- Low-housing demand
- Anti-social behaviour
- Poor property conditions
- High levels of migration
- High levels of deprivation
- High levels of crime

- 5.2 Under selective licensing, all landlords within the licensing area must apply for and pay for a licence if they want to rent out a property. This allowed councils to check whether the landlord is a “fit or proper person” and take enforcement action for breaches of licenses.
- 5.3 Selective licensing targets poor quality PRS housing. The principle issue is landlords not keeping up with routine maintenance or responding to repairs in a timely manner.
- 5.4 By January 2019, 44 local authorities operated selective licensing schemes, including Manchester, Salford and Oldham. Four local authority schemes covered the entire local PRS market, including Liverpool and Newham.

The Benefits of Selective Licensing

- 5.5 There is a growing body of evidence pointing to the long-term benefits of introducing selective licensing areas. These include:
- Selective licensing focuses resources on areas of poor housing conditions and generates revenue to contribute to the costs
 - Improved data on the local housing market
 - Selective licensing provides a clearly defined offence, simplifying enforcement
 - Inspecting properties in a designated area introduces a proactive rather than reactive approach
 - There is no 24-hour notice requirement for accessing homes before inspection
 - Selective licensing can often be a driver for effective engagement between landlords councils
 - Selective licensing can improve joint working between agencies, such as the police, HMRC and social services

Limitations of Selective Licensing

- 5.6 There are limitations to selective licensing and introduction is certainly not a ‘silver bullet’ for problems in the PRS. When combined with other softer measures it can have a significant impact. Key limitations include:
- It is difficult to identify the true extent of the private rented sector in the pre-designation phase
 - The initial process of designation is complex and bureaucratic, requiring significant time, money and other resources
 - The only legal mechanism available to challenge a selective licensing designation is an application for judicial review, which is quite cumbersome

Costs and Resources

Where there are insufficient resources supporting a selective licensing scheme... there are two key problems that commonly arise: either delays in issuing licenses or insufficient enforcement.

MHCLG, An Independent Review of the Use and Effectiveness of Selective Licensing

- 5.7 Lack of knowledge as to what costs actually are associated with the setup and running of the scheme is an issue. Costs associated with IT systems, transportation of inspection officers, recovering monies etc. are often underestimated.
- 5.8 Selective licensing is not a revenue making scheme for the local authority. If, following further research and consultation, the decision is taken to implement selective licensing areas in Tameside and a scheme is successfully implemented it would be cost neutral.

- 5.9 Many of the benefits derived from selective licensing are for landlords. Selective licensing can improve local PRS markets, generating significant capital uplift for property owners. There are many benefits landlords gain from effective selective licensing including:
- Reduce the turnover of occupiers in domestic properties
 - Reduce the number of empty properties
 - Make sure minimum standards for rented housing are met
 - Reduce crime and anti-social behaviour
 - Foster best practice and networking opportunities for landlords
- 5.10 Officers have projected that, (following research and in-depth consultation), if a decision is taken to implement selective licensing in a designated area of 2,250 properties, the total cost for a five-year scheme would be approximately £1,104,150. This figure covers the cost of administration, staffing, operation and management. This cost is to be recovered by the license fee, with landlords paying a licence fee of £490 per property.
- 5.11 Failing to plan for significant numbers of unlicensed properties, due to landlord indifference or lack of effective communication, can lead to less income received than originally planned for and as a result less resources to proactively chase unlicensed landlords. This has a huge impact on the effectiveness of the scheme.
- 5.12 Initial upfront resources of £80k ensure that in-depth research and consultation with a wide variety of stakeholders is delivered. This research and consultation will determine the feasibility and suitability of introducing selective licensing before a decision is taken by the Council.
- 5.13 After consultations have ended there are further costs associated with setting up a scheme such as IT systems and software, publicising the scheme, printing costs and recruitment. The Council must make an effective assessment of all such costs and make budgetary provision for them for the scheme to be successful.

Cost Savings and System Demand

- 5.14 As a Council a key priority is shifting costs relating to 'failure demand' towards long-term planning and early intervention. The right service must reach the right resident when and where they need it, for the best cost.
- 5.15 Sometimes this service should be in the home, before health and social care services have become involved. For a scenario, imagine a licensing inspector inspected a property to make sure it was compliant. The officer finds huge amounts of damp and mould and so corrective action is taken to address this. Tenants living at the property would not be exposed to the threat of developing respiratory problems. Dealing with problems early on reduces demand further down the line.
- 5.16 The Council must look at selective licensing as being part of a wider toolset aimed at improving the wellbeing of residents and the local economy. In particular selective licensing should be used to further a number of core corporate priorities:
- A place-based approach that redefines services and places with individuals, families and communities at the heart
 - A stronger prioritisation of well-being, prevention and early intervention to improve population health.
 - Behaviour change in our communities that builds independence and supports residents to be in control
 - An evidence-led understanding of risk and impact to ensure the right intervention at the right time

6. THE ROLE OF SCRUTINY

6.1 In developing proposals for improving standards in the PRS, to date the Place and External Relations Scrutiny Panel has been an effective forum for developing and debating ideas. Work to date includes:

30 July 2019 – Scrutiny Panel received presentation from Nicola Turner and John Hughes. Working group established to progress work in this area.

24 September 2019 – Members of the working group met to agree a way forward, with a primary focus to support the Council to improve consistency of quality and standards within the PRS.

6.2 Moving forward the Executive should continue to fully involve Scrutiny in development stages and consultation to inform a future approach to improving quality and standards in the PRS. This includes:

- The scoping of the independent review will be shared with the Place and External Relations Scrutiny Panel.
- The Scrutiny Panel Working Group could be involved in interviewing specialist agencies
- Any recommendations that emerge from an independent review will be shared with the Place and External Relations Scrutiny Panel
- A copy of the final report to be shared with Scrutiny Panel

6.3 The work of scrutiny on this subject by no way encroaches on the in-progress review/proposals. Scrutiny provides opportunity to share interim findings and raise supporting recommendations for the Executive to consider and take forward throughout the process.

7. NEIGHBOURHOOD FORUMS

7.1 Presentations detailing conditions in the PRS and the potential for introducing selective licensing were given to each of the four Neighbourhood forums from 14-17 October. Feedback on the initial exercise was positive, with many residents approving of the decision to improve standards in the PRS.

7.2 As with Scrutiny, it is vital that any consideration of the potential introduction of selective licensing is co-produced as much as possible with the input and advice of residents, tenants, landowners, local business interests and community groups.

8. NEXT STEPS

8.1 This report asks for £80k to initiate a package of works and consultation exercise in order to assess the feasibility and suitability of introducing selective licensing in Tameside. Once this package of works has been carried out, a report to for the Council to make a decision on whether to implement selective licensing.

8.2 Of the £80k, £20k is a one-off spend to fund research and consultation activities; £60k is for staffing costs to oversee the feasibility project.

8.3 The £80k will finance the project initiation stage – assessing the suitability and feasibility of introducing selective licensing areas in Tameside. This includes additional resource to progress through the project initiation stage and gather the required evidence on the

potential designation of selective licensing areas in Tameside. Defining areas for selective licensing under available criteria can be complex and may be subject to over-riding borough, regional and national market, employment and lending conditions as well as more local conditions.

Project Initiation Stage Costs	
Commissioning research on Selective Licensing potential in Tameside	£20k
<ul style="list-style-type: none"> • Agree indicators/inception/council data requests • Data gathering, ranking and scoring • Mapping • Report preparation and recommendation 	
Staffing and Management Resource	£60k
Total Cost	£80k

8.4 After the project initiation stage and consultation, a further report will be provided with full costings of the 5 year scheme and expected cost savings to other services.

8.5 Based on successful schemes, it usually takes 12-18 months from the local authority taking the formal decision to consult to selective licensing coming into effect. There are six stages that need to be managed:

- i. Initial political decision to consult
- ii. Develop the consultation paperwork and marketing strategy
- iii. Public Consultation
- iv. Analysis of Consultation Report
- v. Report to Cabinet
- vi. 12 Week statutory period between Cabinet decision and start of the scheme

Initial Political Decision to Consult

8.6 Following PRINCE2 principles, once the Council takes the political decision to consult the Project Initiation Stage includes:

- The reasons for the project, the benefits expected and the associated risks
- The scope of the project
- How and when selective licensing will be delivered and at what cost
- Who is to be involved in the project decision-making
- How the quality required will be achieved
- How baselines will be established and controlled
- Who needs information, in what format and at what time
- How the project can be tailored to suit wider corporate priorities

8.7 A wide range of stakeholders need to be involved throughout the project initiation stage:

Primary Stakeholders	Secondary Stakeholder
<ul style="list-style-type: none"> • Landlords • Landlords organisations • Agents • Tenants • Tenant Organisations • Residents • Businesses, shops and restaurants • Community Groups 	<ul style="list-style-type: none"> • Health and Wellbeing Board • Community Safety Partnership • Environmental Health • Homelessness • Population Health • Early Help • Multi-Agency Safeguarding Hub • Trading Standards • ASB officers • Council Tax

	<ul style="list-style-type: none"> • Highways • Wider VCISO sector
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8.8 Outline Project Plan

Project Stage		Proposed Date
1.	Initial Political Decision to Consult	January 2020 – February 2020
2.	Developing the consultation paperwork and marketing strategy	February–April 2020
3.	Consultation Carried out for a minimum 10 week period, the consultation seeks feedback on the level of support for the proposal; the licensing fee and discount; and experiences of poor management and poor property conditions in the proposed area.	May-Jul 2020
4.	Analyse the consultation report The time taken can depends on the level of responses and number of free text responses.	July-August 2020
5.	Report to Cabinet The reporting process can take 12 weeks	August–November 2020
6.	Cabinet decision and start of scheme If the Council decides that selective licensing is feasible and suitable in designated areas then a decision will be taken to implement. There is 12 Week statutory period between declaration and the start of the scheme	November – February 2021

9. SELECTIVE LICENSING RISKS

- 9.1 The major risks associated with introducing selective licensing include initial funding, increased costs and time delays occurring during the development and delivery phases.
- 9.2 The introduction of Selective Licensing may be seen by private landlords as purely an income generation exercise by the Council. A comprehensive consultation strategy would need to be implemented to address any such concerns, outlining how the scheme could be effectively regulated and demonstrating tangible benefits for the landlords themselves.
- 9.3 Private landlords may object to selective licensing when local authorities do not currently use legislative powers up to their legal limit, such as imposing civil penalties or prosecuting malpractice.
- 9.4 Before the potential introduction of a Selective Licensing Scheme can be declared it would need to be supported by detailed understanding and analysis of the problems associated with poor management in the PRS discussed earlier in the report. This may result in a determination that the scheme is unnecessary.
- 9.5 A significant amount of resources would be required initially to get a localised or borough wide scheme up and running, however, the processing and monitoring of the scheme should then be self-financing once in operation.

10. RECOMMENDATIONS

- 10.1 As set out at the front of the report.