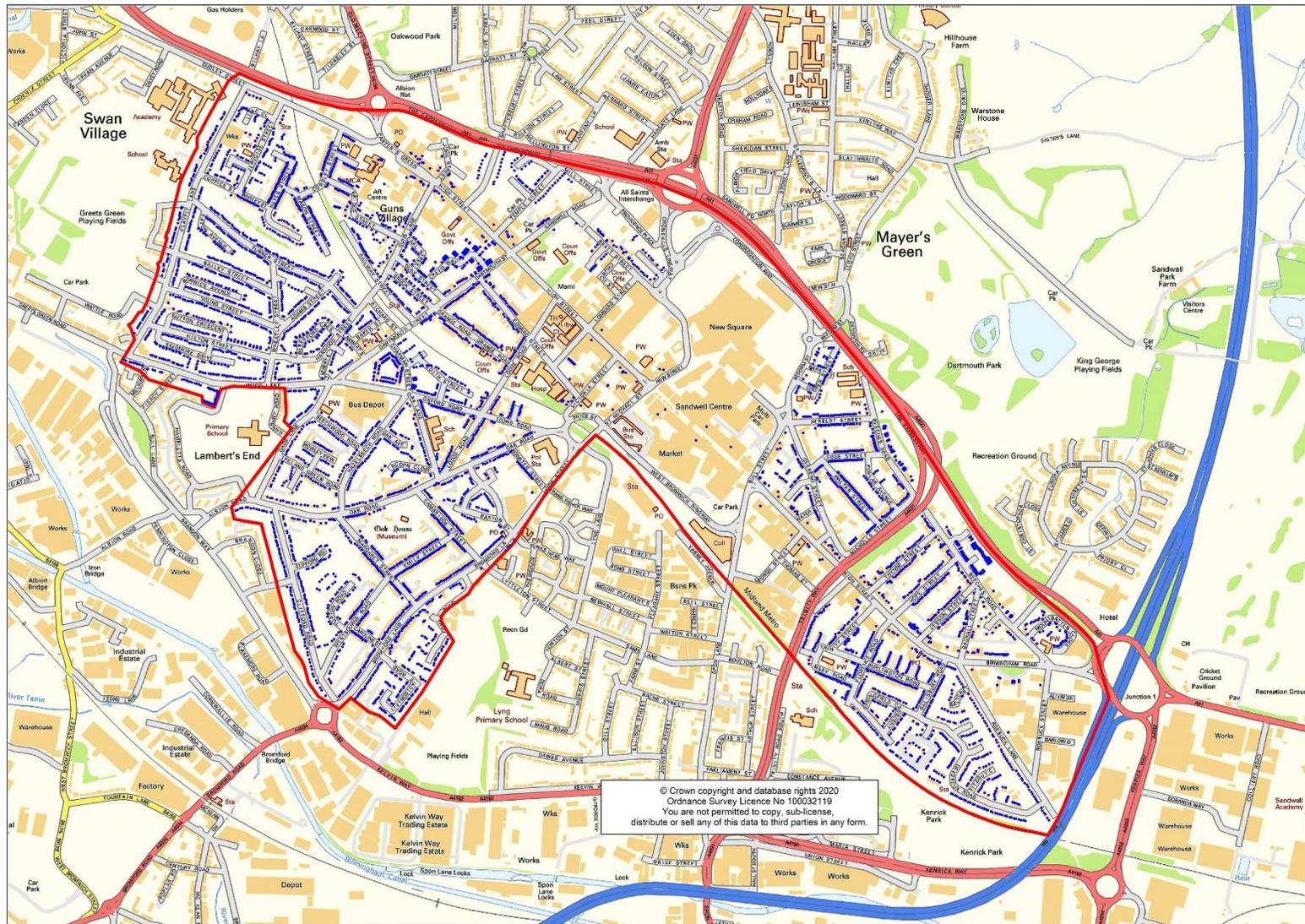


Appendix 1: Map of proposed area in West Bromwich for licensing



Consultation on licensing private rented properties in West Bromwich

Sandwell Council want your views on a proposal to introduce two new property licensing schemes to improve the local environment and housing conditions for privately rented properties in West Bromwich.

This survey will only take around **10 minutes** to complete.

The consultation opens on 27 January 2020 and closes at midnight on 19 April 2020. The results and final recommendations will be reported back to the Council once the consultation responses have been collated. If you have any questions, then please email: sandwellprs@melresearch.co.uk.

What is property licensing?

Local councils can choose to require private landlords or their managing agents to have a licence to rent out their property. A licence usually lasts for five years. The licence conditions state that landlords must keep their property safe and well maintained as well as deal with any problems associated with the property such as dumped rubbish, untidy gardens or anti-social behaviour.

There are **three types** of licensing schemes:

Mandatory Licensing – Since 2004, all councils have had to run a licensing scheme for houses in multiple occupation (HMOs). Any property with five or more people living as two or more households as well as sharing amenities (kitchen, bathroom, shower room etc) will require an HMO Licence.

Additional Licensing – Councils can introduce Additional Licensing to cover any other type of HMO in their area, regardless of the number of people in the property.

Selective Licensing – This type of scheme covers all other private rented properties within the proposed area.

Landlords will have to pay a licence fee for each property they rent out to tenants. The fee will cover the cost of the scheme and allows the council to check the condition of private rented properties in the area to make sure that the correct management arrangements are being carried out.

Sandwell Council believes that extending their current licensing scheme to cover all HMOs in West Bromwich through Additional Licensing, as well as introducing a Selective Licensing scheme for all other privately rented properties in West Bromwich will:

- Improve living arrangements for many tenants by improving the condition of properties.
- Support good landlords and remove rogue landlords from operating.
- Improve the image of the area, making it a desirable place to live.

Before making a decision, the Council wants to hear your views about the proposals and any alternatives they could consider. We would specifically like to hear from private tenants, landlords, letting and managing agents, residents, businesses and organisations operating in West Bromwich and surrounding areas.

Before responding to this questionnaire, we strongly encourage you to read the background information about the proposed schemes, which can be found at melresearch.co.uk/sandwellprs.

The consultation is being run by M·E·L Research, an independent research company. Information you provide will only be used for research purposes and you will not be personally identifiable in any reports; however, organisations may be identifiable.

M·E·L Research work to the Market Research Society code of conduct. We will hold all information securely and strictly in line with the Data Protection Act 2018 and the General Data Protection Regulation (GDPR). You can read our privacy notice at: melresearch.co.uk/privacypolicy.

About you

Q1 Which of the following best describes you? **(Please tick all that apply)**

- A resident of West Bromwich
- A privately renting tenant within West Bromwich
- A landlord with a property (or number of properties) in West Bromwich
- An agent, managing properties in West Bromwich
- A business operating in West Bromwich
- A resident/ landlord/ business in a neighbouring area to West Bromwich
- Other (Please specify below)

Scheme proposal

Sandwell's proposal for introducing Additional and Selective Licensing includes:

Additional Licensing – a scheme that will require all privately rented HMOs in the proposed area to be licensed (if they aren't already under the Mandatory Licensing scheme).

Selective Licensing – a scheme that will require all other privately rented properties in the proposed area to be licensed.

A set of conditions that all landlords must follow – the council believes that the conditions will lead to better managed properties, a reduction in anti-social behaviour and an improvement in living conditions for tenants.

A Licence fee that landlords will have to pay – affected landlords will have to pay a fee which will cover the costs of running the scheme.

The schemes

Q2 To what extent do you agree or disagree with the proposal to introduce an **Additional Licensing** scheme in the selected area? (Please tick one box)

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know

Q3 Please tell us the reason for your answer about an **Additional Licensing** scheme in the box below.

Q4 To what extent do you agree or disagree with the proposal to implement a **Selective Licensing** scheme in the proposed area? (Please tick one box)

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know

Q5 Please tell us the reason for your answer about a **Selective Licensing** scheme in the box below.

Q6 What impact, if any, do you feel implementing an **Additional Licensing** scheme would have on you? (Please tick one box)

- A positive impact
- No impact
- A negative impact
- Don't know

Q7 Please tell us the reason for your answer about an **Additional Licensing** scheme in the box below.

Q8 What impact, if any, do you feel implementing a **Selective Licensing** scheme would have on you? (Please tick one box)

- A positive impact
- No impact
- A negative impact
- Don't know

Q9 Please tell us the reason for your answer about a **Selective Licensing** scheme in the box below.

Licence fees

The Council is proposing to charge £650 per property for a Selective Licence and £850 per property for an Additional Licence before discounts. The licences are for up to 5 years. Fees will be kept under review throughout that period.

You can find more information on the proposed licence fees at melresearch.co.uk/sandwellprs.

Q10 To what extent do you agree or disagree that the proposed **Additional Licence** fees are reasonable? (Please tick one box)

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know

Q11 Please tell us the reason for your answer about the proposed **Additional Licence** fees in the box below.

Q12 To what extent do you agree or disagree that the proposed **Selective Licence** fees are reasonable? (Please tick one box)

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know

Q13 Please tell us the reason for your answer about the proposed **Selective Licence** fees in the box below.

Licence conditions

The conditions are a set of licensing standards that all landlords or managing agents will have to adhere to for both the management and condition of the property. To see the conditions, please follow this link: melresearch.co.uk/sandwellprs.

Q14 To what extent do you agree or disagree that the proposed **Additional Licence** conditions are reasonable? (Please tick one box)

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know

Q15 Please tell us the reason for your answer about **Additional Licence** conditions in the box below.

Q16 To what extent do you agree or disagree that the proposed **Selective Licence** conditions are reasonable? (Please tick one box)

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- Don't know

Q17 Please tell us the reason for your answer about **Selective Licence** scheme conditions in the box below.

Q18 **Other suggestions and comments**

Please use the box below to provide any other comments on the proposals, or any alternatives the Council could consider.

Q19 Sandwell Council will publish the results of the consultation on their website. If you wish to be notified when the results are available, please provide your name and email address below: (this information alone will be passed onto the Council to let you know)

Name:

Email address:

If no email address, please state your home address below (this information alone will be passed onto the Council to let you know)

About you

Sandwell Council are committed to make Sandwell a fair and equal borough. To do this, we are collecting equality monitoring data to understand inequalities in the borough. This helps the Council to demonstrate how they meet their legal duties under Equality Act 2010. All data collected is for monitoring purposes only and is held under the Data Protection Act 2018.

Q20 How old are you? (Please tick one box only)

- Under 21
- 21 – 24
- 25 – 29
- 30 – 44
- 45 – 59
- 60 – 64
- 65 – 74
- 75 or over
- Prefer not to say

Q21 Are you? (Please tick one box only)

- Male
- Female
- Prefer not to say

Q22 Are you? (Please tick one box only)

- A refugee
- An asylum seeker
- Economic migrant – a person who has travelled to another country to work
- None of the above

If applicable, what country or region are you a refugee / asylum seeker from? Please write below:

Q24 What is your ethnic background? (Please tick one box only)

- | | |
|---|---|
| <input type="radio"/> White: British | <input type="radio"/> Mixed: White and Black Caribbean |
| <input type="radio"/> White: Irish | <input type="radio"/> Mixed: White and Black African |
| <input type="radio"/> White: Romanian | <input type="radio"/> Mixed: White and Asian |
| <input type="radio"/> White: Turkish | <input type="radio"/> Asian: Indian |
| <input type="radio"/> White: Kurdish | <input type="radio"/> Asian: Pakistani |
| <input type="radio"/> White: Slovakian | <input type="radio"/> Asian: Bangladeshi |
| <input type="radio"/> White: Polish | <input type="radio"/> Asian: East African Asian |
| <input type="radio"/> White: Czech | <input type="radio"/> Asian: Chinese |
| <input type="radio"/> White: Bulgarian | <input type="radio"/> Black: Caribbean |
| <input type="radio"/> White: Hungarian | <input type="radio"/> Black: African |
| <input type="radio"/> White: Albanian | <input type="radio"/> Any other ethnic background, (Please specify below) |
| <input type="radio"/> White: Lithuanian | <input type="radio"/> Prefer not to say |
| <input type="radio"/> White: other | |

Q25 **Disability**

The Equality Act 2010 defines a disability if someone has a physical or mental impairment which has a substantial and long term adverse effect on his or her ability to carry out normal daily activities.

Do you consider yourself to have a disability? (Please tick one box only)

- Yes
 No

Thank you for taking the time to complete this questionnaire

Please click on the SUBMIT button below.

Appendix 3: Written responses

Response 1

AFTER READING ABOUT PROPOSAL ON LICENSING PRIVATE RATED HOUSING THE MATTER OF PARKING SPRINGS TO MIND, LIKE MANY OTHER PLACES THIS AREA IS CLOSE TO A LOCAL PUB & SANDWELL HOSPITAL - SANDWELL PARK THERE IS A FOOTBRIDGE AT TOP OF STONEY LANE USED TO ACCESS NUB TOWN CENTRE, DAY CENTRE IN SUMMER ST (BUSIS USED TO TRANSPORT PEOPLE TO & FROM THE YES; PARKING IS AN ISSUE - FOR HRS (ON/PAR) A S/WELL WARRY (NOT THE SAME ONE OF COURSE) DRIVERS PARK IN SUMMER ST, AINE TIMES OUT OF 10 ACROSS DROPPED KORB AND UP ON THE GRASS VERGE COMPLAINTS SUBMITTED - 100% IGNORED, IT WAS ALSO REPORTED A DRIVER OF MENTIONED WARRY USING HIS MOBILE 'PHONE WHILE DRIVING IN STONEY LANE AND ACROSS DAY CENTRE & FINALLY PARKED IN SUMMER ST (ACROSS DROPPED KORB) HOWEVER THERE WOULD BE ARGUMENTS THAT PEOPLE RENTING

A PROVERB MIGHT THINK THEY CAN PARK ANYWHERE - JUST A THOUGHT
AN OLD SAYING:-
IF IT ISN'T BROKEN DO NOT
MEND IT.

Response 2

DEAR SANDWELL COUNCIL

PLEASE COME TO [REDACTED] [REDACTED] ROAD TO SEE
THESE HOUSES WHICH ARE RENTED BY
LANDLORDS

[REDACTED] HAS BEEN EMPTY FOR OVER 20 YEARS
ITS NOT FAIR TO LIVE BY THIS WE
HAVE RATS RUNNING ABOUT PLEASE COME
DOWN AND LOOK THE HOUSE IS FALLING
DOWN. FROM [REDACTED] TO [REDACTED] TIME
RENTED OUT AND AS DUMPED ALL
THE GARDEN RUBBISH IN THE DRIVEWAY
WHICH IS A RIGHT OF WAY WE
HAVE ASKED THEM TO SEE THE LANDLORD
NOTHING IS DONE THEY LEAVE AND
THE COUNCIL GIVES THEM A NEW HOUSE
ITS UNFAIR WHEN YOU HAVE PAID YOUR
RATES ALL YOUR LIFE TO PUT UP
WITH THIS THE LANDLORDS DO NOT
CARE IT IS A FINE HAZARD.
THIS LANDLORDS NEED PEOPLE FROM
THE COUNCIL TO CHECK TO SEE
WHAT THEY ARE DOING WITH THE
HOUSES.

THANK YOU.

FROM

[REDACTED] [REDACTED] [REDACTED] HOUSES
IN [REDACTED] [REDACTED] RD.

PLEASE SEND SOMEBODY DOWN.

Response 3

Hello xxxx

-Exactly what purpose will license do for council, for private rented properties? Nothing, ive been running an estate agency for 8 years. This wouldn't doing other than over stress landlords and demand for council properties will increase drastically.

-HMO: I agree there so many landlords taking shortcuts, which needs to be tightened up.

-For privately rented properties things that I think need to be implemented: long waiting times for eviction to be reduced, more support for dss clients

Response 4

Preamble

The purpose of this meeting is to bring together some of the contents of the various reports that I have presented over recent months to Members and Officers of Sandwell MBC and also Sandwell Homes. Over recent years waiting lists for houses have escalated and this has coincided with the general shortage of houses, particularly three and four bedroom properties. In an effort to address this problem Sandwell MBC has been addressing the issue of how the Private Sector can make good the shortfall in the supply of social and municipal housing, at the same time establishing a Choice Based Lettings Scheme. In order to do this, some two years ago I was invited to join the Executive Board of the Sandwell Strategic Housing Forum because of my experience as a small landlord operating in that area. In this respect my family has been letting property in Sandwell for over 60 years and for the last eight to nine I have been a Member of their Landlords Forum. This has enabled me to bring to the attention of all those involved the problems of the Private Sector as seen from the landlord's point of view. The following are therefore edited points from the various reports that I have prepared. The points raised are in no particular order but I have attempted to put them in some form of context.

1. There is an over supply of empty private rented accommodation. This has to be equated with waiting lists in the area which have increased by figures of between 24/105% during recent years.

For instance, the number of empty flats in Wednesbury Town Centre is estimated at 60+ which is joined by some 100 empty houses in the general area. No surveys have been carried out to establish the correct figure. Empty properties are usually associated with higher rents but this is not always the case, particularly in the present difficult times. Somehow we must reconcile the two competing ends, ie empty properties in the private sector with the increased number of persons on the Social Housing waiting lists.

The number of bad landlords needs to be weeded out as a matter of urgency as prospective tenants are becoming very wary of the Private Sector, so much so that they no longer trust adverts in the local press.

The question of research data was not helped by problems that became apparent in the second of your surveys entitled "Private Rented Sector Landlord/Agent Survey 2010" which was issued earlier this year. Such surveys must be more focused, taking on board the views of all departments of the Council instead of the present parochial approach - this must be strongly pointed out to those commissioning the surveys.

2. There is an imbalance between Private and Social Housing in regard to their respective rents. Social Housing rents do not include the cost of land or the cost of servicing loans: this enables Social Housing Providers to charge a rent 50% less than those in the Private Sector which have to be all embracing.
3. In general the Private Sector cannot afford to upgrade their properties to decent home standards whether it was in the rented or the owner occupied section. The Social Sector receives finance for this. This creates problems when letting private property which has a high percentage of pre 1940 properties. Prospective tenants expect properties which are new or have just been modernised and are therefore disappointed with the private property as it does not reach this exacting standard in their eyes. In the majority of instances we cannot compete, even when our houses are certified as being up to decent homes standard – previous tenants have to leave a private property in a decent decorative order but this is never good enough for prospective tenants who expect the very best – it raises the question of how urgently they need accommodation or for that matter how can the Private Sector (without access to grants) compete with such demands. It should be noted that private tenants are responsible for internal decoration, notwithstanding that properties are generally let in a clean and tidy condition, even though colour schemes may not suit.
4. The "right to buy" legislation must be looked at as stocks of affordable houses offered by the Social Sector are reducing. I have had a number of cases of persons willing to have a tenancy only if I agree to sell the property to them at a large discount in four years. A local authority in the south of England, it is believed, has suspended their "right to buy" entitlement and I am sure other housing providers will eventually be forced to look at this option even though it may be contrary to Government thinking. As a condition of receiving grants/finance the Social Housing Sector should be more focused on finding accommodation for benefit/difficult cases who may be unable to access the private sector.
5. First time buyers are 67% down on last year. This will cause more demand for rented accommodation. One of the reasons for this rapid decline is the requirement of mortgage suppliers to require a 25% deposit, prospective buyers cannot find this sort of figure – this is akin to the shortage of deposit money required by Private Landlords in their lets.

6. Affordable Accommodation

To provide this there has to be a saving somewhere as property is presently being sold at rock bottom prices, perhaps some form of subsidy is called for.

Landlords cannot provide their properties at less than their cost including overheads and this fact should be recognised – this is also applicable to developers in the provision of new houses.

In order to release more social housing to accommodate those that genuinely cannot afford accommodation, some form of means test must be introduced – those already in social accommodation who have a good income should pay an economic rent to fund further houses for those who cannot afford such accommodation.

7. Choice based letting.

The Government wants a nationwide system of choice based letting in place by 2010, made up of a partnership between Local Authorities, registered Social Landlords and Private Landlords, I hope that the present series of meetings can achieve this objective by wiping away any lack of understanding between the parties and provide a genuine coalition of equal partners. If worked through in a meaningful fashion, not by creating obstacles but by overcoming them, then we can achieve the greatest choice and mobility in meeting housing needs both locally and nationally for the benefit of all who require it. Such an open approach has the chance of setting a standard/system for others to follow.

8. Different landlords cater for different groups of people with the majority of Private Landlords presently not taking people on housing benefit. This latter point is difficult to put across in adverts, (ie in my case one person should be working) particularly in connection with Choice Based Lettings.

Each Private Landlord caters for a different type of letting of which the main categories are as quoted below. The asterisk indicates Membership of Sandwell's Landlords Forum.

Homelessness and Vulnerable People. (xxx Managing Agent).

Student Lets (non-Housing Benefit). (xxx*).

Professional Lets/New Apartments. (xxx*).

A wide variety of prospective tenants including Single People (and including Housing Benefit recipients). (xxx*).

Families (non-Housing Benefit). (xxx*).

Housing Benefit recipients. xxxx (Managing Agent) – xxx.

Asylum Seekers/Refugees/Care Leavers (UPM or NWPP).

Others exist but are mainly in the Public Sector Market and include such bodies as the YMCA.

9. To quote the obvious, the Private Sector is willing to provide accommodation provided that it can show a net return of between six and eight percent. This implies that the majority of landlords in the sector are only wishing to accommodate those prospective tenants that will pay their rent, take care of the landlord's property and preferably be for the long term; those are the three major requirements. Unfortunately such tenants are in short supply in that over 80% of prospective tenants on the Council's

waiting list are on benefits. The reluctance of Private Landlords to accommodate benefit recipients is governed by a number of factors, eg

- (a) Insurance Companies recognise that persons on benefits and students are by far a worse risk and therefore introduce extra loadings on their policies of up to 25% to allow landlords to accommodate such people. From experience I can confirm that this is the situation.
 - (b) The Government has made the system of paying benefits far too complicated for landlords to accept (if a tenant claims benefit to which he is not entitled then this is recoverable from the landlord, who has to sign to accept this, and not the tenant). Unless it can be proved that a tenant is more than eight weeks in arrears with their rent the Government state that the benefit shall be paid directly to the tenant. Unfortunately, this system does not work as the payment of rent is the last thing on a tenant's mind when tenants receive benefit – this problem is currently being addressed by local authorities but it remains to be seen how effective any new system will be (see separate sheet for other benefit problems).
 - (c) Whilst Local Authorities are trying to reduce the waiting time for the first benefit payment to landlords, landlords still have to wait two to three months before they get their first cheque and in this respect it is always paid in arrear.
10. It should be accepted that the Private Sector in the main is unlikely to accept homelessness and vulnerable people such as ex offenders, persons with mental health problems, refugees and people who are unemployed or cannot manage their affairs. I believe that however deserving these cases are, as they do not fit into the three categories mentioned above, it is unlikely that all but a very small minority will be accommodated in the Private Sector. Therefore, this should be the main province of the Social Housing Provider. The accommodation of vulnerable persons creates major problems for Private Landlords who are blamed for perceived problems which occur in an area - particularly as such problem tenants seem to attract others who visit the property as friends of the occupiers, (this can include persons dealing in drugs who have clients calling, much to the annoyance of neighbours).
11. During the last two or three years I have been afforded the opportunity of meeting the Chief Executives of some of the Social Housing Providers and in one particular instance it was very apparent that they too were experiencing difficulty with benefit recipients and wished to place more people in employment in their accommodation. I was somewhat taken aback at this viewpoint in that, in view of the grants received from Government, Social Housing Providers should be giving priority to tenants who are on benefits, rather than people who are working who are more suitable to be accommodated in the Private Sector.
12. As mentioned in 4 above, and whilst it is Government policy to encourage "right to buy" in the Social Housing Sector, this is having a devastating affect on housing stocks and as Government funds are presently being restricted (and this will no doubt continue for some years yet) stocks will therefore continue to decrease throwing more pressure on the Private Sector to provide much needed

accommodation. In the present difficult times I think that such legislation should be put on hold to prevent housing stocks being reduced to an unacceptable and unsustainable level.

13. One of the biggest problems is reconciling the Private and “Public” Sector in that no statistics are available to indicate the strength of the Private Rented Sector and until this situation is rectified firm policies for the future cannot be established. There is no accurate information as to the number of properties presently rented or available to rent and the type of that accommodation within each area. Steps must be urgently taken to remedy this significant omission.
14. Another major problem in the Private Sector is the number of bad landlords/agents and steps must be taken to educate/remove any such bad landlords together with their problem agents, this will need to be done by recording all persons involved with renting accommodation, much of which is in very poor condition. This does not imply the licencing of landlords or their properties which would provide an avenue for Local Authorities to charge high fees for registration as is being done in Scotland. It should be remembered that over recent years the regulation of the Private Sector has increased several fold, each of which in turn has a financial aspect. The situation now in the Private Sector is that all financial impositions on the landlord have to be passed on to the tenant; this in turn is reducing the number of applicants that can afford that accommodation.
15. Whilst the sector has its share of bad landlords it also has more than its fair share of bad Tenants. Some tenants who seem to use every device to fleece the unsuspecting landlord, one common trick is to pay the first months rent then refuse to pay any further rent and do a moonlight flit before landlords can complete eviction processes. Another problem is that a number of tenants seem to have a complete lack understanding of how to look after landlords property and how to conduct their own financial affairs, and whilst it is possible to weed out the majority of those persons at interview some slip through the net. I think the time is fast approaching when training courses have to be established to enable prospective tenants to understand their responsibilities in relation to their tenancy obligations – perhaps this should be taught in the last years of schooling. In addition to a vast array of possible problem tenants, landlords have to be constantly vigilant to new ruses eg the use of rented properties for cannabis farms.

Response 5

Dear Sirs

Selective Licencing Consultation – Objections

I am a landlord owning properties in areas targeted by your Selective Licencing Scheme and wish to make the following comments.

I strongly object to the introduction of Selective Licencing in Sandwell MBC for the following reasons

1. All charges relating to Selective Licencing will have to be passed on in full to the tenants. This will mean an automatic rent rise for them and as a consequence will take perhaps 10% to 15% of prospective tenants out of the market as already a large percentage of my tenants are having difficulty in paying the rent I charge even though officers of Sandwell MBC regard my rents as being very reasonable.
2. This will create yet another obstacle in the renting of private property and, as such, will dissuade new private landlords from going into the market. In fact many existing landlords may also feel that this is the final straw and also withdraw from the market.
3. Coupled with these objections it is known that banks and similar are refusing loans and insurances on properties within licencing areas as they consider that these areas must be a worse risk. This will have a major impact on landlords who wish to acquire new properties for rent and find that they cannot get the necessary funds or insurance.
4. Your Council's intention in introducing Selective Licencing is to reduce the number of ASBOS affecting the private sector; this it will not do. To date, SMBC has been unable to provide figures that even a small percentage of ASBOS relate to the private sector. Private landlords consider that if this figure be known, it will be less than 5% of the total market and in no way can your council claim that there is a problem in the Private Rented Sector (PRS) in relation to ASBOS. It is believed that if your Council use the present available figures it will result in groups of landlords getting together to fund a judicial review which the landlords believe will show beyond all doubt that very few ASBOS can be directly attributable to the PRS and be very costly to your Council if they lose. It should be noted that many of the ASBOS issued in the core areas relate to other properties in the public areas named, eg public houses and night clubs.
5. Perhaps the biggest problem in the PRS is the question of bad landlords who do not manage or maintain their properties correctly. The existence of such bad landlords and properties will still remain after licencing as the scheme will have no impact whatsoever – other measures must be employed.

6. Your Council, in common with others, would do far better to understand the problems of the PRS and work together to see how those problems can be resolved rather than introducing a string of new regulations. The biggest problem in the PRS is bad tenants and this problem needs to be investigated in great detail as it would be in both our interests to develop a system that would benefit the Social Housing Providers as well as the PRS.
7. The PRS are making determined efforts to regulate their landlords and their properties. To this end they are encouraging landlord accreditation and some landlords are requesting SMBC to accredit individual properties as being up to "Decent Homes" standard as a means of going forward. SMBC already operate a property accreditation scheme and more effort must be made to develop the appropriate liaison necessary between the two sides to encourage more of this. The closer liaison between the two sectors is a sure way forward and instead of spending money on such schemes as Selective Licencing many more rewards will be achieved by the development of these accreditations.
8. According to statistics recently published by the Department of Communities (Review of Property Conditions in the Private Rented Sector) they confirm that a high proportion of private tenants are happy with their landlords.
9. There are very few actual facts that are known about the PRS and until Government and Local Authorities get together to obtain a proper basis for making edicts in the PRS market, then all the schemes proposed will be based on suppositions which are often wide of the mark.
10. The Social Sector can only provide homes for something like 15 out of every 100 persons on their waiting lists, leaving some 85% for the PRS to fill. Surely, in view of this, a far more meaningful dialogue needs to be established between the two sectors, ie Private and Social, to see how the PRS can help fill this gap.
11. The implementation of a Selective Licencing Scheme will require a substantial amount of funds to finance the extra staff and administrative fees and this, together with continually managing those areas after licencing, begs the question "where are these funds coming from"?
12. Selective Licencing will penalise good landlords and their tenants. Your present scheme will jeopardise this.
13. I am particularly concerned regarding the questionnaire that was sent to private tenants regarding the Introduction of Selective Licencing. The questionnaire gave a completely one-sided approach to the benefits of the subject and gave no consideration to the problems in the private sector. Furthermore the questionnaire did not point out any of the above views and, in particular, the fact that rents will rise to cover the cost of licencing and therefore it will preclude a percentage of prospective tenants who can no longer afford my tenancies. I have found that my tenant/s have returned the form thinking only that it will resolve the question of ASBOS of which there are virtually

none in the private sector and that it will do away with bad landlords – both of these objectives will not be met in any way and therefore I regard the questionnaire as very misleading.

14. The question of Selective Licencing raises the issue that if it is found that the cost of providing the service exceeds the income then will the cost of the licence further increase charges to cover this.

Response 6 (online feedback form)

Why does this only apply to the streets listed not all the privately rented properties in Sandwell.

Response 7 (online feedback form)

I have already completed the questionnaire but forgot one very important point. IF this scheme is introduced, I can guarantee that the licence charges will be passed on to the tenants and rents will be increased, that is a given! Therefore tenants who are trying to save to move away from renting a property will be massively affected.



SANDWELL COUNCIL'S SELECTIVE AND ADDITIONAL LICENSING PROPOSALS

A RESPONSE TO THE CONSULTATION FROM SAFEAGENT

INTRODUCTION

safeagent www.safeagentcheme.co.uk is a licensing scheme for lettings and management agents operating in the Private Rented Sector. **safeagent** 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 **safeagent** criteria on an annual basis, in order to retain their licence. The scheme operates UK wide and has 1500 firms with over 2000 offices.

We are an accredited training provider under the Rent Smart Wales scheme. We have also been approved by Government as a provider of the new mandatory Client Money Protection arrangements.

CORONAVIRUS

safeagent is currently calling for new property licensing schemes in the Private Rented Sector (PRS) to be placed on hold, to free up resources.

In the wake of the Coronavirus, **safeagent** says licensing schemes not already in force should be delayed now and reviewed again in six months' time. This approach is two-fold; to ensure focus on maintaining core services through what lies ahead and to discourage non-essential property inspections that could add to community spread of the virus.

safeagent has requested:

- the Secretary of State to impose a six-month moratorium on approving any new selective licensing schemes
- Local Authorities to impose a six-month moratorium on making any new additional and/or selective licensing scheme designations
- any scheme designations made, but not yet in force, to be withdrawn

- any proposed licensing consultations not already underway to be delayed for a similar period of time.

This is because the lettings industry, and the millions of tenants reliant upon it, will be placed under immense pressure in the months ahead. In this context, now is not the right time to implement new property licensing schemes that will necessitate thousands of extra property inspections. We are not anti-licensing but at this time would support urgent measures in response to Coronavirus. It seems likely that the limited resources in local government, and the expertise offered by Environmental Health Officers, will need to be re-focussed on maintaining key public services to support the wider public health agenda. It is important that the lettings industry, central and local government work in close collaboration to tackle the challenges ahead.

We are mindful of the latest government guidance (in particular section 8.2 of the Q&A in this document)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/876501/Local_authority_rented_property_COVID_enforcement_guidance_v2.2.pdf

Notwithstanding the above, we are pleased to be able submit a detailed response to your licensing proposals. This is set out below.

SAFEAGENT AND LICENSING

safeagent is supportive of initiatives such as Selective and Additional Licensing, providing they are implemented in a way that takes account of the Private Rented Sector (PRS)'s own efforts to promote high standards.

safeagent believes that positive engagement with voluntary schemes and the representative bodies of landlords and agents (such as **safeagent**) is essential to the success of initiatives such as Selective Licensing. We are mindful that the operational problems associated with lack of such engagement have been highlighted in House of Commons Standard Note SN/SP 4634.

The same note sets out how important it is for licensing schemes to avoid being burdensome. We believe that promoting voluntary schemes, and offering discounted licence fees to accredited landlords and agents, can help to achieve this. Voluntary schemes often require members to observe standards that are at least compatible with (and are often over and above) those of licensing schemes. We believe, therefore, that if Sandwell Council were to allow discounts based on membership of **safeagent** (as well as other similar bodies) implementing and policing the licensing scheme would ultimately be less costly and more effective, allowing resources to be concentrated in the areas where they are most needed.

This is a commonly accepted approach by many English Local Authorities. We would further point out that, in Wales, the Welsh Government has recognised the importance of membership of specified bodies such as **safeagent** and is offering discounted fees to members as a consequence

<https://www.rentsmart.gov.wales/en/>

PROMOTING PROFESSIONALISM IN THE PRS - THE ROLE OF AGENTS

We welcome the fact that the Council will be “*encouraging more professional landlords*”. We hope that, part of this, they will be encouraging landlords to engage professional agents.

safeagent’s engagement around the country, with various local authorities, suggests that lettings and management agents have a key role to play in making licensing, accreditation and other, voluntary regulatory schemes work effectively. Agents tend to handle relatively large portfolios of properties, certainly when compared to small landlords. They tend, therefore, to be in a position to gain an understanding of licensing based on wider experience. They become expert in trouble shooting and ensuring that the balance of responsibilities between the agent and the landlord is clearly understood. This, amongst other things, can help to prevent non-compliance due to misunderstandings about local licensing arrangements.

Furthermore, **safeagent** ensures its members maintain certain operational standards, have Client Money Protection arrangements in place, keep separate client accounts and comply with their legal obligation to be a member of a redress scheme. We also provide training. All this can be of assistance to councils who are trying to drive up standards in the PRS.

Although agents are now required to belong to a government approved redress scheme, display their fees and publish their client money protection status, our experience to date suggests local authorities face challenges in enforcing these standards. Membership of bodies such as **safeagent** can reduce the need for the local authority to use its formal, legal powers in these areas.

SANDWELL COUNCIL’S PROPOSALS - SPECIFIC ISSUES

Proposed Licensing Area

We welcome the targeted nature of the licensing proposals. We hope that the measures will protect and encourage new investment in the area and not act as a disincentive to existing and prospective landlords.

Selective License Fee, Discounts and Accreditation

We believe that the proposed license fee of £650 is higher than those charged in many local authority areas outside of London. We would suggest that Sandwell Council should reduce the level of the full fee.

We do not understand exactly how the MLAS discount of £165 per initial licence application will work. The consultation document says the discount will apply “*where the accredited landlord is also to be the licence holder or the accredited agent is also to be the licence holder as the owner cannot be deemed to be fit and proper and able to hold the licence*” However, there are many instances in which landlords prefer the agent to be the license holder, even though they would be fit to hold the license themselves.

Could you please confirm that the discount will be available in **all** cases where the managing agent is the license holder?

We note that a discount of £55 per initial licence application is proposed for members of the National Landlords Association (NLA) or the Residential Landlords Association (RLA)

We would request that membership of **safeagent** is added to this list. Specifically, it should be made clear that landlords engaging agents who are members of **safeagent** will qualify for the discount. The discount should be available to:

- Agents who are members of **safeagent** (where the agent is the licence holder)
- Landlords who engage agents that are members of **safeagent** (where the landlord is the licence holder)

We would suggest that this is justified because **safeagent** members and the landlords who engage them are less likely to be non-compliant and that, as a result, there would be reduced costs to the council. We would also suggest that **safeagent** membership mitigates the need for compliance visits to be carried out by the council. For example, the timing and content of these visits could be risk based, recognising that the risk of non-compliance is much lower in the case of properties managed by **safeagent** agents.

We agree with discounts for multiple properties. However, we believe these should also apply where an agent is managing multiple properties on behalf of a number of different landlords, some of whom may only be letting single properties.

We are supportive of the idea of a discount of £55 for properties within the area that have achieved a star rating of 4 or more stars under the Rent Well in Sandwell scheme.

We are not supportive of the idea of Variation Fees. We have not come across these in other Local Authority areas and it seems unreasonable to charge these in addition to the high fee already charged.

Additional License Fee, Discounts and Accreditation

We believe that the proposed license fee of £850 is higher than those charged in many local authority areas outside of London. We would suggest that Sandwell Council should reduce the level of the full fee.

Once again, we do not understand exactly how the MLAS discount of £165 per initial licence application will work. The consultation document says the discount will apply “*where the accredited landlord is also to be the licence holder or the accredited agent is also to be the licence holder **as the owner cannot be deemed to be fit and proper and able to hold the licence***” However, there are many instances in which landlords prefer the agent to be the license holder, even though they would be fit to hold the license themselves.

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License Period, Changes in License Holder and Pro-Rata Fees

We note that the license period will be 5 years. Our experience around the country suggests that the lack of flexibility in most license fee structures can militate against efforts to establish an alternative competent person to be licence holder/ manager, in cases where problems have been identified during the license period, often by the council. This is because (even accredited) agents still have to pay the full fee when they take on management part way through the license period.

Furthermore, it seems unreasonable to charge the full fee for licenses granted part way through the period – especially if there is only (say) one or two years remaining.

Whilst we understand that licenses cannot be “transferable” from one person to another, we would suggest that more flexibility is required than a fixed 5-year term allows. Landlords and agents taking on properties part way through a 5-year term should only have to pay the 5-year fee “pro rata”. If a licence issued but a property ceases to require a licence during the five-year life, a pro-rata refund should be available.

Fee Waiver – Tackling Homelessness

We welcome the fact that the Council will be *“identifying landlords who may be willing to work alongside the council’s homelessness team to enable easier access to private rented sector housing”*

As an incentive for landlords and agents working in partnership with the Council in tackling homelessness, we would suggest that, in cases where a private landlord is assisting the Council by offering permanent accommodation to meet homelessness duties, license applications should be accepted without a fee being payable.

This approach could become more structured if the council were to enter into partnership arrangements whereby lettings agents source properties for council referrals of homeless people or those at risk of homelessness. **safeagent** is currently working on a model whereby a “Social Lettings Agency” is created through links to one or more established local agents. This is an alternative to the traditional approach whereby entirely new voluntary sector entities need to be set up. We would be happy to discuss this model with the council at any time.

LICENCE CONDITIONS

We welcome the fact that the Council will be *“supporting and advising landlords on property conditions and those who might not necessarily be aware of their responsibilities”*. In our detailed comments below we point out some of the areas where compliance with key standards is an inherent part of the **safeagent** scheme. These are the areas where we think promotion of **safeagent**

membership through license fee discounts could ultimately save the Council money, as well as increase the take up of voluntary accreditation.

Tenant Referencing

We are strongly supportive of any requirements to obtain references for prospective tenants, as **safeagent** is actively involved in promoting good practice in tenant referencing.

Tenancy Management

safeagent agents are expected provide and fill in a tenancy agreement on behalf of the landlord. they will always make sure the terms of the tenancy are fair and help the tenant to understand the agreement.

They will always provide clear information to the tenant about any pre-tenancy payments and what these cover. They will explain any requirement for a guarantor and what the guarantor role entails.

At the end of a tenancy, they will always serve the tenant with the correct period of notice as set out in the tenancy agreement.

Under **safeagent's** service standards, agents are required to take a deposit to protect against possible damage. They are required to explain the basis on which the deposit is being held and the purpose for which it is required, as well as to confirm the deposit protection arrangements. When joining **safeagent**, agents are asked to provide details of the number and value of the deposits they have registered with the scheme.

Agents are asked to authorise **safeagent** to contact the scheme to verify this information.

During the course of a tenancy, **safeagent** agents will check the condition of the property and draw up a schedule to outline any deductions to be made from the tenant's deposit. They will return the deposit in line with timescales and processes required by the statutory tenancy deposit schemes.

safeagent agents are also required to:

- Have a designated client account with the bank
- Operate to strictly defined Accounting Standards
- Be part of a mandatory Client Money Protection Scheme.

These requirements provide additional security for client monies held, over and above the requirements of the Sandwell licensing scheme. Again, this is an area where increased **safeagent** membership would be of benefit to the Council and local tenants.

Licence Conditions Relating to the Property

We welcome Sandwell Council's drive to improve property standards. We believe that **safeagent's** standards go a long way to ensuring compliance with license conditions.

Under **safeagent's** service standards, **safeagent** agents are expected to visit any property to be let with the landlord and advise on any action needed before letting the property. This includes any repairs and refurbishments needed to put it into a fit state for letting. They will also go with possible new tenants to view unoccupied property. Tenants can, therefore, be confident that **safeagent** agents have provided advice to the landlord concerning any repairs or refurbishments which are necessary.

safeagent agents are expected to explain both the landlord's and the tenant's the rights and responsibilities. To guard against misunderstandings, they will arrange for the preparation of a schedule of the condition of the property.

safeagent agents are required to ensure that tenants are provided with copies of safety certificates on gas and electrical appliances before they commit to the tenancy. They will provide details of the condition of the property, plus a list of its contents. The property will have undergone all required safety checks on furnishings, and gas and electrical services.

Thereafter, **safeagent's** standards require agents to carry out property inspections periodically, as agreed with the landlord, in line with normal good practice. **safeagent** and our firms would anticipate inspections to be carried out every 6 months as a minimum, to identify any problems relating to the condition and management of the property. In line with common practice, records of such inspections would contain a log of who carried out the inspection, the date and time of inspection and issues found and action(s) taken. Under a licensing scheme, this information could be shared with the council in an appropriate format.

Tenants will be fully aware of access arrangements. **safeagent** agents are expected to arrange in advance a time for access, in order to inspect the condition of the property in accordance with the tenancy agreement. **safeagent** agents will arrange to have routine maintenance work carried out, up to a limit agreed with the landlord. The agent will refer expenditure above that limit to the landlord.

Training

We would welcome any proposal that agents who are license holders should undergo training.

Membership of **safeagent** means that agents already have access to an extensive training package, engagement with which should reduce the need for the local authority to intervene. Although not a *condition* of **safeagent** membership, **safeagent** offers accreditation through an online foundation course as well as qualifications such as BTEC Level 3 in Lettings and Management practice.

safeagent offers training to those who have been involved in lettings and management for some time as well as those who are just starting out. Training is available for principals of firms as well as employees. Thus, **safeagent's** Virtual Learning Environment (VLE) is designed to cater for a wide range of professional development needs. Training is easily accessible and can be undertaken when it suits the trainee. Any candidate completing the **safeagent** Foundation Lettings Course successfully also has the opportunity to use the designation '**safeagent qualified**'. **safeagent** Foundation Lettings Course (Wales) is also approved training recognised by Rent Smart Wales, the Welsh Government's regulatory body as meeting the requirements for agents to have complying with their licensing requirement.

One advantage of this approach is that it makes it easy to ascertain (through on-line monitoring) that participants have in fact undertaken the required training, prior to or immediately after accreditation.

Modules available cover:

- Pre-tenancy issues
- Responsibilities and liabilities
- Setting up a tenancy
- During a tenancy
- Ending a tenancy

- General law concepts, statute vs contract
- Relationships
- Obligations
- Process
- Considerations for corporate tenants
- Continuing Professional Development (CPD)

In addition, **safeagent** provides mini online courses designed to cover a number of elements in more detail, as appropriate to the learner's role, include topics such as:

Assured Shorthold Tenancies (ASTs)
Client Money
Consumer Protection Regulations (CPRs)
Deposits
Disrepair
Electrical Appliances & Safety
Gas Appliances & Safety
Houses in Multiple Occupation (HMOs)
Housing, Health & Safety Rating System (HHSRS)
Inventories and schedules of condition
Joint Tenancies
Notice Requiring Possession

We would further suggest that discounted fees for **safeagent** agents would provide an incentive to positive engagement with training that is fully compatible with the requirements of the licensing scheme.

Anti-Social Behaviour

We note that there are distinctive issues around crime and Anti-Social Behaviour (ASB) in the licensing area. However, we do have concerns about the assumed link between the amount of PRS accommodation in the neighbourhood and the incidence of ASB.

There may be some *correlation* between incidences of ASB and the prevalence of PRS accommodation on the area. However, correlation does not imply *causation*. The *causes* of ASB are many and varied. It is not, in our view, reasonable to expect agents and landlords to play a disproportionately large part in tackling them.

Furthermore, we would strongly advise against any proposals which imply a parity of approach between the PRS and the social rented sector. Social landlords are publicly funded (and regulated) to develop and manage housing on a large scale. Their social purpose brings with it wider responsibilities for the communities in which they work. As private businesses, PRS landlords and their agents, whilst having clear responsibilities to manage their properties professionally cannot reasonably be expected to tackle wider social problems.

Suitability of Licence Holder

We note the requirement that the council would only issue a licence if it is satisfied that the proposed licence holder is a 'fit and proper' person and that there are suitable management arrangements in place. We believe that this requirement highlights the importance of lettings and management agents belonging to recognised accrediting bodies like **safeagent**, who themselves apply a fit and proper person test.

All principals, partners and directors of a **safeagent** firm are asked to make the following declaration on application:

– “I confirm that: for a period of 10 years prior to this application I have had no conviction for any criminal offence (excluding any motor offence not resulting in a custodial sentence) nor have I been guilty of conduct which would bring the Scheme or myself into disrepute; I am not an undischarged bankrupt nor is there any current arrangement or composition with my creditors; I am not nor have I been a director of a company which has within the period of 10 years prior to this application entered into liquidation whether compulsory or voluntary (save for the purpose of amalgamation or reconstruction of a solvent company) nor had a receiver appointed of its undertaking nor had an administration order made against it nor entered into an arrangement or composition with its creditors; nor have I at any time been disqualified from acting as a Director of a company nor subject to a warning or banning order from the Consumer Markets Authority or the Department for Business, Enterprise and Regulatory Reform.

If I am subject to any current claim or am aware of any impending claim for professional negligence or loss of money or if I have been the subject of any investigation by the Consumer Markets Authority and/or local Trading Standards Office, full details of the circumstances are set out in a report enclosed with the application; all information provided by me in connection with this application is, to the best of my knowledge, correct”

We believe this certification is broadly in line with Sandwell council's licensing conditions and is another example of where promotion of **safeagent** membership through discounts could help to ensure compliance.

Complaints

All **safeagent** firms are required to have a written customer complaints procedure, available on request. Our guidance sets out how the first step for complainants is to ask the firm they are dealing with for a copy, which will outline the method by which they can seek to resolve any issues.

In line with statutory requirements, all **safeagent** members must also be members of a recognised redress scheme. Firms are required, at the request of the complainant, to refer the complaint to a redress scheme once their in-house procedure has been exhausted. They are also required to comply with any award determined by the redress scheme, within the timescale prescribed.

Elsewhere in the UK, **safeagent** has undertaken to review any complaints that have been adjudicated upon by any of the redress schemes. Under such an arrangement, **safeagent** can report to the Council on the number of complaints reaching this stage and on the adjudications made. Non-compliance with a redress scheme's adjudication would eventually lead to disqualification of the agent from **safeagent**. We would be happy to come to a similar arrangement with Sandwell .

MEASURING THE SUCCESS OF THE SCHEME

We note the objectives set out by the Council for the scheme. We believe that regular information on implementation of the scheme should be made available in a clear and consistent format. Reports to local landlord and agent forums, representative bodies and other stakeholders should include at minimum:

- The estimated number of private rented properties that require licensing under the selective licensing scheme
- The number of applications received in respect of these properties
- Progress in processing (granting, querying or refusing) the licence applications received
- Analysis of the reasons for any queries or refusals and the extent to which remedial action is identified and taken as a result
- Analysis of the outcomes of ongoing inspections and the extent to which remedial action is identified and taken as a result
- Progress reports across the whole 5 year period covered by the scheme.

This should help to enable the Council to work in partnership with landlords, agents, representative bodies and other stakeholders to ensure the success of the scheme.

CONCLUSION

It seems to us that many of the licencing requirements in the Sandwell scheme highlight how important it is for landlords to work with reputable agents such as **safeagent** members. Offering a discount to licence holders who work with a **safeagent** accredited agent would help to promote this.

safeagent would welcome a collaborative approach with Sandwell Council, based on shared objectives. We believe that agents who are members of a recognised body are more likely to embrace Selective Licensing and less likely to generate complaints or breaches of their licence. Discounted fees for **safeagent** members would be a significant incentive to positive engagement by agents. In return, the Council would experience reduced administration and compliance costs.

CONTACT DETAILS

safeagent
Cheltenham Office Park
Hatherley Lane
Cheltenham
GL51 6SH

Tel: 01242 581712 Email: info@safeagentcheme.co.uk

APPENDIX 1 – COMPATIBILITY OF SAFEAGENT SERVICE STANDARDS WITH TYPICAL SCHEME CONDITIONS

Example Scheme Conditions	SAFEAGENT Service Standard Requirements
Fees	SAFEAGENT promotes complete transparency in agency fees. Members provide landlords with a statement of account as often as agreed.
Rent Liabilities and Payments	SAFEAGENT agents collect the rent and pass it on every month or as otherwise agreed. The agent will keep a separate clients' account to hold all monies.
Contact Details	SAFEAGENT agents are expected to respond to tenant and other legitimate enquiries in a timely manner. Up to date contact details will enable them to respond to tenants' requests for maintenance or repairs which might in some cases have to be referred to the landlord for approval.
State of Repair	SAFEAGENT agents visit the property with landlords and advise on any action needed before letting the property. This includes any repairs and refurbishments needed to put it into a fit state for letting. They will also go with possible new tenants to view unoccupied property. Tenants can be confident that SAFEAGENT agents have provided advice to the landlord concerning any repairs or refurbishments which are necessary.
Access and Possession arrangements	SAFEAGENT agents will visit the property periodically during the course of the tenancy as often as agreed with the landlord. Tenants will be fully aware of access arrangements. At the end of a tenancy, they will always serve the tenant with the correct period of notice as set out in the tenancy agreement.

Example Scheme Conditions	SAFEAGENT Service Standard Requirements
Repairs and Maintenance	SAFEAGENT agents will arrange to have routine maintenance work carried out, up to a limit agreed with the landlord. The agent will refer expenditure above that limit to the landlord.
Access, Cleaning and Maintenance of Common Parts	SAFEAGENT agents will arrange in advance a time for access to the property in order to inspect the condition of the property in accordance with the tenancy agreement.
Level of Facilities	SAFEAGENT agents ensure that tenants are provided with copies of safety certificates on gas and electrical appliances before you commit to the tenancy. They provide details of the condition of the property, plus a list of its contents. The property will have undergone all required safety checks on furnishings, and gas and electrical services.
Deposits	SAFEAGENT agents provide and fill in a tenancy agreement and take a deposit to protect against possible damage. They will explain the basis on which it is being held and the purpose for which it is required
References	SAFEAGENT agents choose a tenant in a way agreed with the landlord, taking up references or checking the tenant's rent payment record.
Complaints & Dispute Handling	<p>SAFEAGENT agents explain both the landlord's and the tenant's the rights and responsibilities. To guard against misunderstandings, they will arrange for the preparation of a schedule of the condition of the property.</p> <p>During the tenancy, they will arrange to check the condition of the property and draw up a schedule to outline any deductions to be made from the tenant's initial deposit. They will return the deposit as soon as possible, less any appropriate deductions.</p>

Response 9



National Landlords
Association Skyline
House (2nd Floor)
200 Union Street, London,
SE1 0LX Telephone: 020 7840
8900

Email: info@landlords.org.uk

Response to Sandwell Council's proposal for selective licensing

March 2020

Introduction

1. The National Landlords Association (NLA) exists to protect and promote the interests of private residential landlords.
2. The NLA represents 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.
3. We seek a fair legislative and regulatory environment for the private rented sector, while aiming to ensure that landlords are aware of their statutory rights and responsibilities.
4. We thank Sandwell Council for providing us with the opportunity to comment on the selective licensing proposal.

Executive summary

5. Having considered the evidence presented, and having undertaken our own evaluation of the circumstances faced by the residents of Sandwell, our position can be summarised by the following brief points:
 - Landlords have very limited authority when dealing with matters related to antisocial behaviour, especially if it happens outside the curtilage of the property.
 - The council fails to provide evidence of a direct link between recorded housing crime and the private rented sector.
 - The scheme will lead to further displacement of problem tenants in and around Sandwell and neighbouring councils.
 - The documentation provided fails to indicate that sufficient funding will be available to support the introduction of licensing. Adult social care will have to be involved as many tenants have mental health, alcohol, or drug related illnesses.
 - The council fails to say how it will prevent malicious claims of antisocial behaviour being made, which could result in tenants losing their tenancies. Can this be provided?
 - The document says that Sandwell Council will use all its legal powers. However, if it were to use the powers it already has, it would solve the issues and would not require selective licensing.
 - The council has not published its strategy for dealing with chaotic and antisocial tenants. This should run in conjunction with the current proposal.
 - Selective licensing will require other council strategies to be put in place if it is to tackle anti-social behaviour, these are currently missing.
 - The council fails to say how the proposal will tackle rent-to-rent and subletting, or even Airbnb.

6. We contend that the flaws in the process and proposals, as outlined above, must be rectified before this application is progressed. Furthermore, once the necessary data has been identified and provided, this consultation exercise should be then be repeated to ensure engagement with all relevant stakeholders with the new evidence, solutions and council policies.

General feedback on proposals

7. Licensing is a powerful tool. If used correctly by Sandwell Council, it could resolve specific issues. We have supported many local authorities in the introduction of licensing schemes that benefit landlords, tenants and the community. In this case, the council's lack of evidence does not support its arguments for the introduction of licensing.

8. The council, by implementing selective licensing, will be further fuelling the cost of renting. While the costs associated with the council will be passed through so will the landlords costs. With a lack of affordable housing, Sandwell and other local authorities are appealing to landlords to help place tenants. The introduction of licensing will make it more difficult.

9. House prices are already high in Sandwell and in some cases, renting is the only option, this has to be taken into consideration, with the introduction of a scheme. The impact of a licensing scheme will not be only on landlords, but it will also tenants.

10. This will also affect insurance, as premiums will increase for everyone now that the council says that antisocial behaviour is a significant problem. This will add costs to those renting as well as to owner-occupiers.

11. We believe that any regulation of the private rented sector must be balanced. Additional regulatory burdens should focus on increasing the professionalism of landlords, improving the quality of private rented stock and driving out the criminals who act as landlords and 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. Good practice should be recognised and encouraged, in addition to the required focus on enforcement activity. This is not the case here.

12. In addition, the proposal does not take into account rent-to-rent or those who exploit people (both tenants and landlords). Criminals will always play the system. For instance, there is no provision for landlords who have legally rented out a property that has later been illegally sublet. The council will need to allocate resources to tackle these problems that criminals cause. Often, landlords are victims, just as much as tenants. What support will the council provide for landlords to whom this has happened?

13. Newham reorganised its council services to deliver its licensing scheme. A joined-up coordinated approach within the council will be required. Additional costs in relation to adult social care along with children's services and housing will be incurred if the council's goal is to be achieved. Yet there is no evidence from the council that this will be done – can this be provided?

14. The issue of overcrowding is difficult for a landlord to manage if it is the tenant that has overfilled the property. A landlord will tell a tenant how many people are permitted to live in the property, and that the tenant is not to sublet it or allow additional people to live there. Beyond that, how is the landlord to manage this matter without interfering with the tenant's welfare? Equally, how will the council assist landlords when this problem arises? It is impractical for landlords to monitor the everyday activities or sleeping arrangements of tenants. Where overcrowding does take place, the people involved know what they are doing and that they are criminals, not landlords. The council already has the powers to deal with this. It also raises concerns for the NLA as this is not currently being undertaken by the council.

15. The proposal fails to address the link between homelessness and the effect that licensing will have on tenants in Sandwell. This impact on tenancies due to a selective licensing scheme is absent from the document. This should be viewed through the prism of the changes proposed by government on Section 21.

16. Landlords are usually not experienced in the management of antisocial behaviour and do not have the professional capacity to resolve tenants' mental health issues or drug and alcohol dependency. If there are allegations about a tenant causing problems (e.g. antisocial behaviour) and a landlord ends the tenancy, the landlord will have dispatched their obligations under the selective licensing scheme, even if the tenant has any of the above issues. This moves the problems around Sandwell, but does not actually help the tenant, who could become lost in the system, or worst moved towards the criminal landlords. They will also blight another resident's life. There is no obligation within selective licensing for the landlord to resolve an allegation of antisocial behaviour. Rather, a landlord has a tenancy agreement with a tenant and this is the only thing that the landlord can legally

enforce.

17. Referencing will not resolve the issue, as a landlord can provide a reference where no offence has been prosecuted, and it is an allegation. If a landlord puts this allegation in a reference, they could be sued by the tenant for something that has not been proved but was an allegation that was untrue. Equally, a credit reference would only show the credit history of a tenant, not anything else.

18. Sandwell Council has many existing powers. Section 57(4) of the Housing Act 2004 implies that a local authority must not make a designation 'unless (a) they have considered whether there are any other courses of action available to them [...] that might provide an effective method [for Sandwell Council to deal] with the problem or problems in question'. The council already has powers that can be used to rectify the problems and, hence, the ability to tackle many of the issues that it wishes to overcome in all parts of Sandwell. These include:

- criminal behaviour orders
- crime prevention injunctions
- interim management orders
- empty dwelling management orders
- improvement notices (for homes that do not meet the Decent Homes Standard)
- litter abatement notices (section 92 of the Environmental Protection Act 1990)
- fixed penalty notices or confiscation of equipment (sections 8 and 10 of the Noise Act 1996)
- directions regarding the disposal of waste (e.g. section 46 of the Environmental Protection Act 1990)
- notices to remove rubbish from land (sections 2–4 of the Prevention of Damage by Pests Act 1949).

19. We would argue that Sandwell is failing to use its existing powers. It would be better if the council were to use the powers that already exist to solve issues that it claims exist before undertaking licensing. Licensing is not a solution in itself; the council will fall back on existing powers for enforcement, which it is failing to use currently.

20. At the commencement of a tenancy, the landlord outlines the tenant's obligations in relation to noise (and other matters such as waste disposal, compliance with relevant laws and having consideration for their neighbours). The landlord can manage a tenant only to the extent of their mutually agreed contract for living in the rented property – not for a tenant's activities in the street outside the property or neighbouring streets. In the case of a noise complaint, the council would have to inform the landlord that the tenant was being excessively noisy. The landlord then has the right 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 end the tenancy based on an unproven allegation or because the council says that there is a problem. This does not solve the problem but rather moves it around the borough. The same applies to household refuse and other antisocial behaviour issues. The tenant could be labelled as guilty without having faced a trial. Under the reference condition of selective licensing, a guilty judgment can be made without an accusation being tested by their peers in a court of law.

21. The ending of a tenancy will be a way for a landlord to resolve an allegation of antisocial behaviour, waste mismanagement or even a malicious complaint. This will not resolve the issue of high tenancy turnover; it will exacerbate it.

22. The introduction of licensing is likely to increase costs for tenants without solving the problems that the council is trying to target. It will likely move the issues around Sandwell and neighbouring areas and displace them to new landlords. The issues would be better resolved by a more erudite approach to dealing with nuisance and a separate policy to tackle criminals acting as landlords.

23. Often when tenants are nearing the end of their contract/tenancy and are in the process of moving out, they will dispose of excess household waste by a variety of methods. These include putting waste out on the street for the council to collect. This is made worse when the council does not allow landlords access to municipal waste collection points. Local authorities with a large number of private rented sector properties need to consider a strategy for the collection of excess waste at the end of tenancies. We would be willing to work with the council to help develop such a strategy. An example is the Leeds Rental Standard, which works with landlords and landlord associations to resolve issues while staying in the framework of a local authority.

24. One of the arguments the council has put forward is that selective licensing is being introduced due to the size of the PRS. Can the council clarify: a) is it the council's policy to reduce the PRS in these areas; and b) where does the council wish to see PRS grow in Sandwell?

25. We also have concerns over how a scheme will interact with the current government consultation on Section 21. The change to how tenancies will end and a move to a more adversarial system, will mean landlords will become

more risk adverse to take tenants that do not have a perfect reference and history.

26. One of the dangers of the proposed selective licensing scheme is that the costs will be passed on to tenants. This would increase costs both for those who rent in Sandwell and for the council. The increased costs to Sandwell residents would particularly hit those 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, landlords will likely cover their increased costs by raising rent prices. The failure to explain this shows a lack of understanding of how the private rented sector works. This could mean that landlords will look for tenants from other councils, as they are offering incentives (e.g. Haringey is offering £4,000 plus the Central London Local Housing Allowance rate). We know they are placing tenants out of London and into the west midlands, which a policy such as this will escalate.

27. Areas that have been subject to the introduction of selective licensing have seen lenders withdraw mortgage products, thereby reducing the options available to landlords who are reliant on finance. Downstream, this increases overheads for landlords and tenants. When lenders withdraw mortgage availability from a landlord, that decision appears on that landlord's credit history. Other mortgage lenders will see this credit score and put a higher cost on mortgage/landlord, which will ultimately reach the tenant through rent.

28. Defining areas of Sandwell as having significant issues in the consultation will not encourage lending or investment into those areas. The stigmatisation will be reflected in property values within them. Sandwell Council, by proposing to introduce licensing, is implying that there are social problems that could deter investment in those areas. The council does not acknowledge the impact that the stigmatisation of discretionary licensing will likely have. It will likely increase all car and house insurance premiums, but the council has not told Sandwell residents about this. We assert that failure to provide such information indicates a substandard and, ultimately, superficial consultation exercise.

29. The social housing sector has made many efforts to remove problem tenants (see table below). How does the council expect landlords to solve these tenants' issues when the social sector has failed? Many of the tenants who have been removed from the social sector are now living in the private rented sector without any support. This selective licensing policy will have a greater impact on those people who are evicted from social housing, as they will not be able to access the PRS as they will fail the reference check (mandatory condition).

Mortgage and landlord possession statistics 2016¹

Year (calendar)	Landlord type		Claims issued
	Private*	Social	
2016	2,583 (39.7%)	4,789 (60.3%)	7,372 (100%)
*includes all accelerated claims			

Current law

30. A landlord currently has to comply with over 130 pieces of legislation, and the laws with which the private rented sector must comply can be easily misunderstood. A landlord is expected to give the tenant a 'quiet enjoyment' of the property. Failure to do so could result in a harassment case being brought against the landlord. The law within which landlords must operate is not always fully compatible with the aims of the council. For example, a landlord keeping a record of a tenant could be interpreted as harassment.

31. Licensing is introduced to tackle specific issues. Many of these are related to tenants, which the council has identified. The challenge for local authorities is to work with all the people involved and not simply to blame one group – e.g. landlords. We are willing to work in partnership with the council to develop tenant information packs, assured shorthold tenancies and accreditation of landlords, along with targeting the worst properties in a given area.

¹ www.gov.uk/government/statistics/mortgage-and-landlord-possession-statistics-october-to-december-2016.

32. We would also argue that problems that are restricted to only a few poorly managed and/or poorly maintained properties would not be appropriately tackled by a licensing scheme – it is not proportionate. In many situations, the council should consider enforcement notices and management orders. The use of such orders would deliver immediate results. Why, instead, does the council wish to address them over a period of five years and through a licensing scheme? A targeted, street-by-street approach, working on specific issues in a coordinated manner with other relevant agencies, such as community groups, tenants and landlords, would have a much greater impact. Does the council propose to inspect all properties?

33. We would also like to see the council develop a strategy that includes action against any tenants who are persistent offenders. These measures represent a targeted approach to specific issues, rather than a blanket licensing scheme that would adversely affect all professional landlords and tenants alike, while leaving criminals able to operate covertly. Many of the problems are caused by mental health or drink and drug issues. Landlords cannot resolve these issues and will require additional resources from the council.

34. In relation to the reduction of antisocial behaviour and the authority that landlords have 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 (NB: House of Commons briefing note SN/SP 264, paragraph 1.1). In most circumstances, the only remedy available to landlords who are confronted with serious antisocial behaviour in one of their properties will be to seek vacant possession. 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 need 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 rehoused (NB: Homelessness Guidelines cl 8.2). Crucially, no affected party needs to offer evidence against an antisocial householder, thereby reducing the risk of intimidation, harassment and, ultimately, unsuccessful possession claims. The issue of antisocial behaviour will, thus, not appear as a factor in the repossession. However, when providing evidence to support a licensing application, the document should clarify the position of all the relevant issues under landlord and tenant law.

Requests for supplementary information

35. We are extremely concerned about the gaps in evidence and justification that occur throughout the licensing proposal. Can the council commit to inspecting all properties during the five-year period? Equally can the council produce an annual inspection rate.

36. We would like clarification on the council's policy in relation to helping a landlord when a section 21 notice (or future notice as currently being consulted upon) is served, the property is overcrowded or the tenant is causing antisocial behaviour, as per what the council says in the consultation. What steps will the council take to support the landlord? It would be useful if the council were to put in place a guidance document before the introduction of the scheme, to outline its position regarding helping landlords to remove tenants who are manifesting antisocial behaviour.

37. We would like a breakdown of antisocial behaviour complaints over the last five years, subdivided into antisocial behaviour that has proven to be housing-related and for the different housing sectors (owner-occupied, social providers and private rented).

38. We would like to know what consideration the council has given to homelessness, where these tenants cannot access the private rented sector, due to the introduction of this scheme and conditions.

39. The council fails to say what additional services will be provided for mental health. This will have an impact on adult social care budgets for the county council – and this budget is already under pressure. How much money has been allocated from the county to meet this?

Appendix 4: Responses by methodology

Each table shows the breakdown by count (number of people who selected the response) and percentage (in brackets) for each method – those who took part in the online survey and those who took part in the postal survey.

1. Which of the following best describes you? (Please tick all that apply)

	Online	Postal
A resident of West Bromwich	66 (46.8%)	366 (83.0%)
A privately renting tenant within West Bromwich	17 (12.1%)	43 (9.8%)
A landlord with a property (or number of properties) in West Bromwich	47 (33.3%)	28 (6.3%)
An agent, managing properties in West Bromwich	3 (2.1%)	4 (0.9%)
A business operating in West Bromwich	6 (4.3%)	19 (4.3%)
A resident/ landlord/ business in a neighbouring area to West Bromwich	18 (12.8%)	23 (5.2%)
Other (Please specify below)	8 (5.7%)	31 (7.0%)

2. To what extent do you agree or disagree with the proposal to introduce an Additional Licensing scheme in the selected area? (Please tick one box)

	Online	Postal
Strongly agree	60 (42.6%)	303 (67.5%)
Agree	25 (17.7%)	66 (14.7%)
Disagree	11 (7.8%)	9 (2.0%)
Strongly disagree	39 (27.7%)	42 (9.4%)
Don't know	6 (4.3%)	29 (6.5%)

3. Please tell us the reason for your answer about an Additional Licensing scheme in the box below.

Verbatim comments provided to Council separately (111 respondents to online survey / 361 to postal survey).

4. To what extent do you agree or disagree with the proposal to implement a Selective Licensing scheme in the proposed area? (Please tick one box)

	Online	Postal
Strongly agree	39 (27.9%)	286 (64.4%)
Agree	33 (23.6%)	60 (13.5%)
Disagree	9 (6.4%)	18 (4.1%)
Strongly disagree	51 (36.4%)	45 (10.1%)
Don't know	8 (5.7%)	35 (7.9%)

5. Please tell us the reason for your answer about a Selective Licensing scheme in the box below.

Verbatim comments provided to Council separately (98 respondents to online/ 325 to postal survey).

6. What impact, if any, do you feel implementing an Additional Licensing scheme would have on you? (Please tick one box)

	Online	Postal
A positive impact	62 (44.6%)	247 (55.9%)
No impact	24 (17.3%)	95 (21.5%)
A negative impact	40 (28.8%)	32 (7.2%)
Don't know	13 (9.4%)	68 (15.4%)

7. Please tell us the reason for your answer about an Additional Licensing scheme in the box below.

Verbatim comments provided to Council separately (90 respondents to online survey / 286 to postal survey).

8. What impact, if any, do you feel implementing a Selective Licensing scheme would have on you? (Please tick one box)

	Online	Postal
A positive impact	45 (32.8%)	240 (55.0%)
No impact	20 (14.6%)	92 (21.1%)
A negative impact	59 (43.1%)	40 (9.2%)
Don't know	13 (9.5%)	64 (14.7%)

9. Please tell us the reason for your answer about a Selective Licensing scheme in the box below.

Verbatim comments provided to Council separately (78 respondents to online survey / 274 to postal survey).

10. To what extent do you agree or disagree that the proposed Additional Licence fees are reasonable? (Please tick one box)

	Online	Postal
Strongly agree	30 (21.4%)	181 (40.9%)
Agree	25 (17.9%)	93 (21.0%)
Disagree	14 (10.0%)	29 (6.5%)
Strongly disagree	55 (39.3%)	63 (14.2%)
Don't know	16 (11.4%)	77 (17.4%)

11. Please tell us the reason for your answer about the proposed Additional Licence fees in the box below.

Verbatim comments provided to Council separately (96 respondents to online / 289 to postal survey).

12. To what extent do you agree or disagree that the proposed Selective Licence fees are reasonable? (Please tick one box)

	Online	Postal
Strongly agree	24 (17.3%)	177 (40.7%)
Agree	24 (17.3%)	89 (20.5%)
Disagree	16 (11.5%)	36 (8.3%)
Strongly disagree	62 (44.6%)	59 (13.6%)
Don't know	13 (9.4%)	74 (17.0%)

13. Please tell us the reason for your answer about the proposed Selective Licence fees in the box below.

Verbatim comments provided to Council separately (87 respondents to online / 274 to postal survey).

14. To what extent do you agree or disagree that the proposed Additional Licence conditions are reasonable? (Please tick one box)

	Online	Postal
Strongly agree	39 (28.7%)	238 (54.0%)
Agree	35 (25.7%)	93 (21.1%)
Disagree	10 (7.4%)	11 (2.5%)
Strongly disagree	38 (27.9%)	38 (8.6%)
Don't know	14 (10.3%)	61 (13.8%)

15. Please tell us the reason for your answer about Additional Licence conditions in the box below.

Verbatim comments provided to Council separately (66 respondents to online / 249 to postal survey).

16. To what extent do you agree or disagree that the proposed Selective Licence conditions are reasonable? (Please tick one box)

	Online	Postal
Strongly agree	29 (21.5%)	206 (48.5%)
Agree	36 (26.7%)	97 (22.8%)
Disagree	12 (8.9%)	17 (4.0%)
Strongly disagree	42 (31.1%)	37 (8.7%)
Don't know	16 (11.9%)	68 (16.0%)

17. Please tell us the reason for your answer about Selective Licence scheme conditions in the box below.

Verbatim comments provided to Council separately (59 respondents to online / 215 to postal survey).

18. Please use the box below to provide any other comments on the proposals, or any alternatives the Council could consider.

Verbatim comments provided to Council separately (79 respondents to online / 223 to postal survey).

19. Sandwell Council will publish the results of the consultation on their website. If you wish to be notified when the results are available, please provide your name and email address below: (this information alone will be passed onto the Council to let you know)

Email address provided: 83 for online / 171 for postal survey.

20. How old are you? (Please tick one box only)

	Online	Postal
Under 21	0 (0.0%)	5 (1.1%)
21 – 24	2 (1.6%)	1 (0.2%)
25 – 29	5 (3.9%)	4 (0.9%)
30 – 44	37 (28.9%)	70 (16.0%)
45 – 59	48 (37.5%)	134 (30.7%)
60 – 64	11 (8.6%)	63 (14.4%)
65 – 74	13 (10.2%)	83 (19.0%)
75 or over	3 (2.3%)	62 (14.2%)
Prefer not to say	9 (7.0%)	15 (3.4%)

21. Are you? (Please tick one box only)

	Online	Postal
Male	51 (40.8%)	218 (50.1%)
Female	63 (50.4%)	199 (45.7%)
Prefer not to say	11 (8.8%)	18 (4.1%)

22. Are you? (Please tick one box only)

	Online	Postal
A refugee	0 (0.0%)	5 (1.3%)
An asylum seeker	0 (0.0%)	0 (0.0%)
Economic migrant – a person who has travelled to another country to work	4 (3.2%)	33 (8.3%)
None of the above	121 (96.8%)	359 (90.4%)

23. What is your ethnic background? (Please tick one box only)

	Online	Postal
White: British	68 (54.8%)	268 (61.8%)
White: Irish	0 (0.0%)	2 (0.5%)
White: Romanian	0 (0.0%)	0 (0.0%)
White: Turkish	0 (0.0%)	0 (0.0%)
White: Kurdish	1 (0.8%)	2 (0.5%)
White: Slovakian	0 (0.0%)	0 (0.0%)
White: Polish	1 (0.8%)	10 (2.3%)
White: Czech	0 (0.0%)	0 (0.0%)
White: Bulgarian	0 (0.0%)	0 (0.0%)
White: Hungarian	1 (0.8%)	0 (0.0%)
White: Albanian	0 (0.0%)	0 (0.0%)
White: Lithuanian	0 (0.0%)	0 (0.0%)
White: other	5 (4.0%)	5 (1.2%)

Mixed: White and Black Caribbean	1 (0.8%)	5 (1.2%)
Mixed: White and Black African	0 (0.0%)	0 (0.0%)
Mixed: White and Asian	0 (0.0%)	3 (0.7%)
Asian: Indian	17 (13.7%)	68 (15.7%)
Asian: Pakistani	4 (3.2%)	4 (0.9%)
Asian: Bangladeshi	3 (2.4%)	8 (1.8%)
Asian: East African Asian	0 (0.0%)	0 (0.0%)
Asian: Chinese	0 (0.0%)	1 (0.2%)
Black: Caribbean	3 (2.4%)	12 (2.8%)
Black: African	3 (2.4%)	4 (0.9%)
Any other ethnic background, (Please specify below)	2 (1.6%)	10 (2.3%)
Prefer not to say	15 (12.1%)	32 (7.4%)

24. Do you consider yourself to have a disability? (Please tick one box only)

	Online	Postal
Yes	17 (14.3%)	112 (26.2%)
No	102 (85.7%)	316 (73.8%)

Appendix 5: Responses from outside West Bromwich

There were 41 responses in total from respondents who said they lived outside of West Bromwich.

Each table shows the total number of counts (number of people who selected the response) and percentages (in brackets) for those who said they were from outside of West Bromwich.

To what extent do you agree or disagree with the proposal to introduce an Additional Licensing scheme in the selected area? (Please tick one box)

Count = 41	%
Strongly agree	46.3%
Agree	26.8%
Disagree	2.4%
Strongly disagree	19.5%
Don't know	4.9%

To what extent do you agree or disagree with the proposal to implement a Selective Licensing scheme in the proposed area? (Please tick one box)

Count = 40	%
Strongly agree	35.0%
Agree	27.5%
Disagree	7.5%
Strongly disagree	27.5%
Don't know	2.5%

What impact, if any, do you feel implementing an Additional Licensing scheme would have on you? (Please tick one box)

Count = 40	%
A positive impact	47.5%
No impact	15.0%
A negative impact	20.0%
Don't know	17.5%

What impact, if any, do you feel implementing a Selective Licensing scheme would have on you? (Please tick one box)

Count = 39	%
A positive impact	46.2%
No impact	7.7%
A negative impact	28.2%
Don't know	17.9%

**To what extent do you agree or disagree that the proposed Additional Licence fees are reasonable?
(Please tick one box)**

Count = 40	%
Strongly agree	30.0%
Agree	10.0%
Disagree	2.5%
Strongly disagree	35.0%
Don't know	22.5%

**To what extent do you agree or disagree that the proposed Selective Licence fees are reasonable?
(Please tick one box)**

Count = 40	%
Strongly agree	30.0%
Agree	10.0%
Disagree	5.0%
Strongly disagree	32.5%
Don't know	22.5%

To what extent do you agree or disagree that the proposed Additional Licence conditions are reasonable? (Please tick one box)

Count = 39	%
Strongly agree	38.5%
Agree	12.8%
Disagree	7.7%
Strongly disagree	23.1%
Don't know	17.9%

To what extent do you agree or disagree that the proposed Selective Licence conditions are reasonable? (Please tick one box)

Count = 39	%
Strongly agree	33.3%
Agree	23.1%
Disagree	7.7%
Strongly disagree	20.5%
Don't know	15.4%

How old are you? (Please tick one box only)

Count = 39	%
Under 21	2.6%
21 – 24	2.6%
25 – 29	-
30 – 44	25.6%
45 – 59	25.6%
60 – 64	12.8%
65 – 74	17.9%
75 or over	2.6%
Prefer not to say	10.3%

Are you? (Please tick one box only)

Count = 38	%
Male	31.6%
Female	55.3%
Prefer not to say	13.2%

Are you? (Please tick one box only)

Count = 37	%
A refugee	2.7%
An asylum seeker	-
Economic migrant – a person who has travelled to another country to work	2.7%
None of the above	94.6%

What is your ethnic background? (Please tick one box only)

Count = 39	%
White: British	56.4%
White: Irish	-
White: Romanian	-
White: Turkish	-
White: Kurdish	-
White: Slovakian	-
White: Polish	-
White: Czech	-
White: Bulgarian	-
White: Hungarian	-
White: Albanian	-
White: Lithuanian	-

White: other	-
Mixed: White and Black Caribbean	2.6%
Mixed: White and Black African	-
Mixed: White and Asian	-
Asian: Indian	15.4%
Asian: Pakistani	5.1%
Asian: Bangladeshi	5.1%
Asian: East African Asian	-
Asian: Chinese	-
Black: Caribbean	2.6%
Black: African	5.1%
Any other ethnic background, (Please specify below)	2.6%
Prefer not to say	5.1%

Do you consider yourself to have a disability? (Please tick one box only)

Count = 37	%
Yes	16.2%
No	83.8%

Appendix 6: Demographic profile of respondents

Each table shows the total number of counts (number of people who selected the response) and percentages (in brackets) for those who provided a response to the question.

How old are you? (Please tick one box only)

Under 21	5 (0.9%)
21 – 24	3 (0.5%)
25 – 29	9 (1.6%)
30 – 44	107 (18.9%)
45 – 59	182 (32.2%)
60 – 64	74 (13.1%)
65 – 74	96 (17.0%)
75 or over	65 (11.5%)
Prefer not to say	24 (4.2%)

Are you? (Please tick one box only)

Male	269 (48.0%)
Female	262 (46.8%)
Prefer not to say	29 (5.2%)

Are you? (Please tick one box only)

A refugee	5 (1.0%)
An asylum seeker	0 (0.0%)
Economic migrant – a person who has travelled to another country to work	37 (7.1%)
None of the above	480 (92.0%)

What is your ethnic background? (Please tick one box only)

White: British	336 (60.2%)
White: Irish	2 (0.4%)
White: Romanian	0 (0.0%)
White: Turkish	0 (0.0%)
White: Kurdish	3 (0.5%)
White: Slovakian	0 (0.0%)
White: Polish	11 (2.0%)
White: Czech	0 (0.0%)
White: Bulgarian	0 (0.0%)
White: Hungarian	1 (0.2%)
White: Albanian	0 (0.0%)
White: Lithuanian	0 (0.0%)
White: other	10 (1.8%)
Mixed: White and Black Caribbean	6 (1.1%)
Mixed: White and Black African	0 (0.0%)
Mixed: White and Asian	3 (0.5%)
Asian: Indian	85 (15.2%)
Asian: Pakistani	8 (1.4%)
Asian: Bangladeshi	11 (2.0%)
Asian: East African Asian	0 (0.0%)
Asian: Chinese	1 (0.2%)
Black: Caribbean	15 (2.7%)
Black: African	7 (1.3%)
Any other ethnic background, (Please specify below)	12 (2.2%)
Prefer not to say	47 (8.4%)

Do you consider yourself to have a disability? (Please tick one box only)

Yes	129 (23.6%)
No	418 (76.4%)