

<b>LONDON BOROUGH OF CAMDEN</b>	<b>WARDS:</b> ALL
<b>REPORT TITLE</b> Update on improving housing standards in the private rented sector.	
<b>REPORT OF</b> Director of Housing	
<b>FOR SUBMISSION TO</b> Housing Scrutiny	<b>DATE</b> 11 November 2025
<b>SUMMARY OF REPORT</b>  This report provides an update on the Council's actions to improve standards within the private rented sector. The report covers enforcement activity, proactive interventions and looking forward to the new duties and responsibilities from the Renters' Rights Bill which received Royal Assent on Monday 27 October 2025.  <b>Local Government Act 1972 – Access to Information</b>  No documents that require listing have been used in the preparation of this report.  <b>Contact Officer:</b> Darren Wilsher, Private Sector Housing Service Manager 8 <sup>th</sup> Floor, 5 Pancras Square, London, N1C 4AG <a href="mailto:darren.wilsher@camden.gov.uk">darren.wilsher@camden.gov.uk</a> Tel: 020 79742797	
<b>RECOMMENDATIONS</b>  That the Committee note and comment on the Council's actions to improve standards within the private rented sector.	

Signed:   
 Director of Housing

Date: 29<sup>th</sup> October 2025

## 1. Purpose of the report

- 1.1. This report provides an update on activities undertaken by the Private Sector Housing Service (PSH) to improve standards and the management of private rented accommodation in Camden, including a summary of the opportunities and impacts from the Renters' Rights Act 2025.

## 2. Background

- 2.1. The proportion of Camden residents renting in the private rented sector has grown significantly over the last 20 years, increasing by a third to 36%. The sector plays a crucial role in delivering housing in the borough, which has been driven by several factors:
  - **Unaffordability:** Property prices in Camden have increased by 73% in the last 15 years. A combination of high property prices and tight mortgage regulations has made home ownership less accessible, leading more people to rent. The average rent in Camden makes up over 65% of median pay in 2024, with an average monthly private rent for a 1-bedroom flat of £2,300 per month.
  - **Urban Appeal:** Camden's vibrant cultural scene and excellent transport links attract a diverse range of residents, including professionals, students, and key workers.
- 2.2 Through We Make Camden, the Council has outlined its ambition that everyone should have a place they call home. In particular, Camden has enough decent, safe, warm and family-friendly housing to support our communities. However, increasing house prices, a limited supply of social housing, and the high costs of renting in the private sector present significant challenges. They also present an opportunity for a minority of landlords to exploit vulnerable tenants by providing poor quality accommodation and failing to comply with basic minimum standards.
- 2.3 The Housing Act 2004 requires local housing authorities to review housing standards within their district. The requirements of the Act are wide-ranging and also refer to other legislation which between them covers:
  - Dwellings that fail to meet the minimum standards for housing (i.e. dwellings with Housing Health and Safety Rating System (HHSRS) category 1 hazards)
  - Houses in multiple occupation (HMO)
  - Demolition and slum clearance
  - The need for provision of assistance with housing renewal
  - The need to assist with the adaptation of dwellings for disabled persons

### 3 Update on actions taken to improve standards within PRS

#### 3.1 Reactive complaints

3.2 The PSH service receives 454 complaints on average each year from private renters, with requests for support ranging from damp and mould (34%), disrepair (14%), failure to respond to repairs, to harassment and illegal eviction (Appendix 1 - Table 2).

3.3 The council has a statutory duty under the Housing Act 2004 to ensure that properties are free from category 1 hazards as assessed under the HHSRS, a risk-based evaluation tool to help local authorities identify and protect against 29 hazards to health and safety from any deficiencies identified in dwellings. Over the last year, the PSH service has served 16 Improvement Notices to remove 29 category 1 hazards from 51 properties and 53 category 2 hazards (Appendix 1 – Table 1). The majority of cases received (52%) are resolved by informal action with the landlord, in line with the council's enforcement policy (Appendix 1 - Table 3).

3.4 The majority of landlords seek to provide good quality and safe accommodation for their tenants and are keen for the council to ensure that there is a level playing field when dealing with criminal landlords seeking to exploit vulnerable tenants. The service makes use of all tools available to ensure that standards are improved and criminal landlord operations are disrupted, during 2024/25 eight prosecutions were obtained against landlords. The service has also secured eight banning orders against landlords since they were introduced under the Housing and Planning Act 2016, an intervention reserved for those who commit multiple offences.

3.5 **Trading Standards** plays a crucial role in supporting and regulating the private rented sector (PRS) in the UK, working alongside local authority housing teams to protect tenants and ensure landlords and letting agents comply with legal standards. The PSH has two dedicated Trading Standards officers, whose responsibilities include:

- **Enforcing consumer protection laws** such as the *Consumer Protection from Unfair Trading Regulations 2008*, which prohibit misleading advertising and unfair practices by landlords and agents.
- **Monitoring compliance** with key housing legislation, including the *Tenant Fees Act 2019*, *Consumer Rights Act 2015*, and *Energy Efficiency (Private Rented Property) Regulations 2015*. These laws govern issues like banned fees, transparency in marketing, and minimum energy efficiency standards.
- **Investigating unlawful practices** such as illegal evictions, unsafe housing conditions, and fraudulent rent-to-rent arrangements, which can put tenants at risk and leave landlords unknowingly liable.
- **Ensuring redress and accountability**, by checking that agents belong to approved redress schemes and have client money protection in place.

- **Issuing penalties and taking enforcement action** where breaches occur, helping to raise standards and deter rogue operators in the sector. So far this year they have issued £44,500 in fines.
- 3.6 By tackling misleading practices, promoting safety, and supporting fair treatment of tenants, Trading Standards helps create a more transparent and accountable rental market.
- 3.7 **Defective cladding remediation**
- 3.8 Local authorities have a critical role in addressing defective cladding on private high-rise residential buildings, in the wake of the Grenfell Tower tragedy. Under the Housing Act 2004, the Council is empowered to take enforcement action when unsafe cladding poses a risk to the health and safety risk of occupants. The service receives new burdens funding of £140,246 from the government to support this important enforcement work.
- 3.9 Over the past 12 months, the PSH service has maintained a proactive and robust approach to the remediation of buildings with dangerous cladding across Camden. To strengthen operational capacity, the team has used some of the funding received to second a highly experienced Principal Environmental Health Officer from the Reactive Team and engaged a contractor who is a qualified fire risk assessor.
- 3.10 During this period, the team has issued seven statutory notices under the Housing Act 2004. Three appeals against Improvement Notices served in 2023/2024 have also been heard. Although the outcomes of the hearings varied, none of the Improvement Notices were quashed by the First-tier Tribunal, indicating strong support for the team's decision-making and overall enforcement strategy.
- 3.11 All Aluminium Composite Material (ACM) cladding identified on high-rise buildings in Camden has now been remediated, with the exception of one building. Responsibility for enforcement action on this remaining site has been transferred to the London Fire Brigade (LFB). The team continues to collaborate closely with both the Ministry of Housing, Communities and Local Government (MHCLG) and the LFB to monitor progress and ensure the eventual removal of the ACM.
- 3.12 As a result of the team's sustained efforts, there are currently no high-rise buildings in Camden classified as high risk. Accordingly, the team is now transitioning its focus to mid-rise buildings, encouraged by the government's Remediation Acceleration Plan to ensure that all buildings over 11 metres with unsafe cladding are either remediated or scheduled for remediation by 2029. The Building Safety Regulator has provided a dataset identifying approximately 11,000 mid-rise buildings within the borough. Following an initial prioritisation exercise, this list has been refined to 144 buildings which could be the highest risk and require further assessment.

### 3.13 Empty Properties

- 3.14 The council has a statutory and strategic responsibility to bring empty properties back into use, to help meet housing demand. The Housing Act 2004 provides enforcement tools such as Empty Dwelling Management Orders (EDMOs), which allows councils to take control of long-term vacant homes and manage them for housing purposes while ownership remains with the original owner. Authorities may also issue Compulsory Purchase Orders (CPOs) where voluntary engagement fails, enabling them to acquire properties for redevelopment or resale to responsible owners.
- 3.15 Over the last 12 months, 58 properties have been brought back into use through the PSH service's intervention. This was achieved via a combination of advice, support, and threat of enforcement action such as CPO, where little progress was being made following initial contact. A particularly successful intervention is advising owners that they can secure a VAT reduction from 20% to 5% on specific works. This is only applicable to properties that have been empty for over 2 years. This strategy has resulted in a further 12 properties being brought back into use.
- 3.16 Where potential enforcement action is mentioned, owners either sell the property or carry out renovations to make the property habitable, to rent out or occupy themselves. This approach is taken as a last resort, particularly where properties are eyesores or causing anti-social behaviour.

## 4 Licensing of houses in multiple occupation

- 4.1 **HMO Licensing schemes** – The council has operated a mandatory HMO licensing scheme since 2006 for larger HMOs, as required under the Housing Act 2004. Since 2015, it has also operated a borough wide discretionary additional HMO licensing scheme for smaller HMOs and specific properties converted into self-contained flats (section 257 HMOs). The PSH service has recently secured the renewal of the discretionary scheme, following public consultation, for a further 5 years from 8 December 2025.
- 4.2 As at 21 October 2025, 2,945 HMOs are licensed across both schemes, with 648 licences being issued this year alone. A further 1,589 applications are being processed. During the course of the current designation, 5,625 applications have been received and 3,138 inspections completed to assist determine licence conditions (Appendix 1 - Table 8).
- 4.3 Cabinet considered a report in January 2025, which included a review of the current additional HMO licensing scheme. The review identified that the scheme was having a positive impact on improving property and management standards within Camden, ultimately improving the health, safety and wellbeing of tenants. The review identified that 94% of additional HMO licences required works to meet the HMO standards. Licences prioritised for compliance inspections found that in 80% of cases, works were either in progress or had been completed. However, there remains a significant number of applications where there is a cause for concern, which relates to the management of the

property or where previously required improvements have not been carried out, for these cases a 1-year (2-years under the new designation from 2025), rather than 5-year licence is issued. So far this year 170, 1-year licences have been issued.

- 4.4 **Compliance and Monitoring** – An essential element of licensing is compliance and monitoring, ensuring that landlords maintain their properties and continue to meet our minimum HMO standards, comply with licence conditions, and manage the properties appropriately. Over 300 compliance inspections have been completed during the current designation.

## **5 Engagement and Partnership working**

- 5.1 Of equal importance to the council's enforcement work is our engagement and partnership work. The PSH service hosts successful landlord forums twice yearly which attract 150-200 landlords. The forums cover a wide range of topics that are relevant to landlords, delivered by industry experts. We also send out regular newsletters to nearly 6,000 landlords, with updates on key legislative changes, training opportunities etc.
- 5.2 Tenant engagement has been a challenge, with the PSH service exploring various methods to engage with private renters. The service ran two online tenant forums in 2023 with disappointing levels of engagement (30 + 15), despite attempting various channels to reach out. The forums covered subjects highly relevant to tenants such as cost of living, damp and mould, renters reform bill, HMOs, claiming back rent, letting agents etc.
- 5.3 Between 18 February and 26 March this year the PSH service held four evening private renters' advice surgeries covering eight wards in different parts of the borough. The surgeries were a collaborative effort between ward members and a range of services which support private renters. Council teams were on hand to provide information and advice on cost of living, energy efficiency, air quality, noise problems, public health, health checks, community safety, disrepair, harassment and illegal evictions and advice on the new Renters' Rights legislation. The surgeries were also timed to highlight the ongoing consultation concerning the renewal of the borough wide additional houses in multiple occupation scheme. Despite a diverse communication plan and significant effort to promote the event, attendance was disappointingly low, with only 1 to 25 tenants showing up.
- 5.4 The service also holds regular PRS partner meetings attended by Age UK, Citizens Advice, Flat Justice, Generation Rent, Safer Renting, Justice for Tenants and Camden Federation of Private Tenants (as well as several members of staff from across several relevant services). The meetings are an opportunity to share information and work together on shared objectives.

## 6 London Landlord Accreditation Scheme (LLAS)

- 6.1 **Management of LLAS** – Camden manages and operates the LLAS on behalf of all London local authorities. It is the largest accreditation scheme operating in the UK and is unique as it's backed by local authorities, with over 65,000 accredited private landlords and agents. A key aim is to professionalise landlords, helping them to understand their responsibilities. Camden has managed LLAS for 20 years since its inception. There are currently 2,505 accredited landlords in Camden.

## 7 Renters' Rights Act 2025

- 7.1 At the time of finalising this report, the Renters' Rights Bill had just received Royal Assent on 27 October 2025. The Act introduces a wide range of reforms for the private rented sector. Key provisions of the Act:
- 7.2 **Abolition of Section 21 "no-fault" evictions:** Landlords will no longer be able to evict tenants without a valid reason. All evictions must now rely on revised Section 8 grounds, such as persistent rent arrears, property sale, or serious anti-social behaviour.
- 7.3 **End of fixed-term tenancies:** Assured Shorthold Tenancies (ASTs) will be replaced with open-ended periodic tenancies. Tenants can leave with two months' notice, while landlords must use legal grounds to regain possession.
- 7.4 **Decent Homes Standard extended to private rentals:** All properties must meet minimum safety, heating, and damp-free standards. A recent public consultation exercise has recently closed on this, with a suggested implementation date of 2035.
- 7.5 **New Ombudsman and Property Database:** A national ombudsman will handle disputes, and landlords must register on a public database. The property database will better enable the council to communicate proactively with landlords, although there will be an additional burden around enforcement.
- 7.6 **Enforcement and Local Authority Powers:** With effect from 27 December 2025, councils will have stronger powers to inspect properties without notice and enforce standards, including illegal eviction investigations.
- 7.7 **Duty to report:** Local authorities will be required to report on over 50 performance indicators on a quarterly/annual basis on their enforcement activity in the private rented sector. Include data on:
- Investigations into housing conditions.
  - Enforcement actions taken (e.g. improvement notices, prohibition orders).
  - Civil penalties issued.
  - Rent repayment orders pursued.
  - Illegal eviction cases handled.

This duty is designed to:

- Increase transparency about how councils are tackling poor housing conditions and rogue landlords.
- Support better targeting of resources by identifying areas with high levels of non-compliance.
- Enable central government oversight of local enforcement performance.

7.8 A more detailed analysis of the key provisions can be found in Appendix 2.

7.9 **Camden preparations** – A project team has been established to ensure the council is ready to respond to its new duties and provide support to tenants and landlords following Renters' Rights Act 2025 receiving Royal Assent. An initial assessment of impacts has already been completed, with key themes arising (Appendix 3):

- Communications – raising awareness for tenants and landlord
- Development of new policies and procedures
- Training for staff on new procedures and duties

1.1. A key challenge is determining the likely need for additional resources across relevant services to ensure that duties and expectations introduced under the Act are met. Initial estimations have been made, however, actual needs will depend on various factors, including a range of secondary legislation and regulations providing clarity on how new duties are expected to be implemented.

## 8 Finance Comments of the Director of Finance

8.1 The Private Sector Housing Service sits within the general fund (GF). The service is in part funded from license fee and fine income, which in line with legislation must be invested back within the service, and from the Council's core spending power.

8.2 It is not yet known whether additional pressures funding will be received from central government in respect of new responsibilities placed on the service through The Renters Rights Act (2025).

## 9 Legal Comments of the Borough Solicitor

9.1 The Borough has been consulted and has no further comments to add.

## 10 Environmental Implications

10.1 The actions of the service will have positive environmental implications by ensuring that private rented accommodation is free of hazards relating to excess heat and cold. Typically officers will require additional insulation, better glazing to be installed to mitigate these hazards to the health and wellbeing of tenants.



## **11 Appendices**

Appendix 1 – Enforcement and HMO licensing tables

Appendix 2 – Renters' Rights Act summary of key impacts

Appendix 3 – Actions arising from impact and risk assessment of Renters' Rights Bill

**REPORT ENDS**

## Appendix 1 – Enforcement and HMO Licensing tables

Table 1. Number of complaints received from private renters

<b>Complaints received by private renters</b>	<b>No.</b>
2020/21	386
2021/22	484
2022/23	476
2023/24	495
2024/25	427
<b>Total</b>	<b>2,268</b>
<b>Average</b>	<b>454</b>

Table 2. Top 15 complaints by type (April 2023 to October 2025)

<b>Complaint by types (top 15)</b>	<b>No.</b>	<b>%</b>
Damp and mould	689	34%
Disrepair/multiple hazards	275	14%
Request for advice	205	10%
Excess cold	129	6%
Fire risks	112	6%
Management of HMO	94	5%
Personal hygiene, drainage	76	4%
Electrical hazards	75	4%
Pests	72	4%
Water leaks	58	3%
No hot water	57	3%
Structural stability	46	2%
Security of property	44	2%
Rubbish accumulation	39	2%
Water supply	32	2%
<b>Total</b>	<b>2003</b>	

Table 3. Case closure outcome (April 2020 to October 2025)

<b>Reasons for closure (last 5 years)</b>	<b>No.</b>	<b>%</b>
Resolved by informal action	1033	52%
Nothing actionable	291	15%
Resolved by formal action	215	11%
No further contact from client	238	12%
Referred to other service	133	7%
No contact with complainant	67	3%
Client requested no further action	28	1%
<b>Total</b>	<b>2005</b>	

Table 4. Enforcement notices served

<b>Enforcement notices issued</b>	<b>Since 1 April 2023</b>	<b>This year</b>
Improvement notice	74	16
Prohibition Order	34	4
Hazard Awareness Notice	3	0
Environmental Protection Act (Nuisance)	45	11
Civil Penalty Notices	425	119
Prevention of damage by pests	23	7
Building Act	22	1
Public Health Acts	24	4
Banning Orders secured	1	0

Table 5. Hazards identified and rectified

<b>HHSRS hazards identified and rectified (1 April 2023 to 31 March 2025)</b>				
	Category 1	Category 2	Cat 1 rectified	Cat 2 rectified
2023/25	30	54	29	53

Table 6. Civil Penalty Notices issued

<b>Civil Penalty Notices</b>	<b>Since 1 April 2023</b>	<b>This year</b>
Failure to licence HMO	110	21
HMO Management Regulations	185	49
Failure to comply with HMO licence conditions	130	49

Table 7. Civil Penalty Notices – value of fines issued

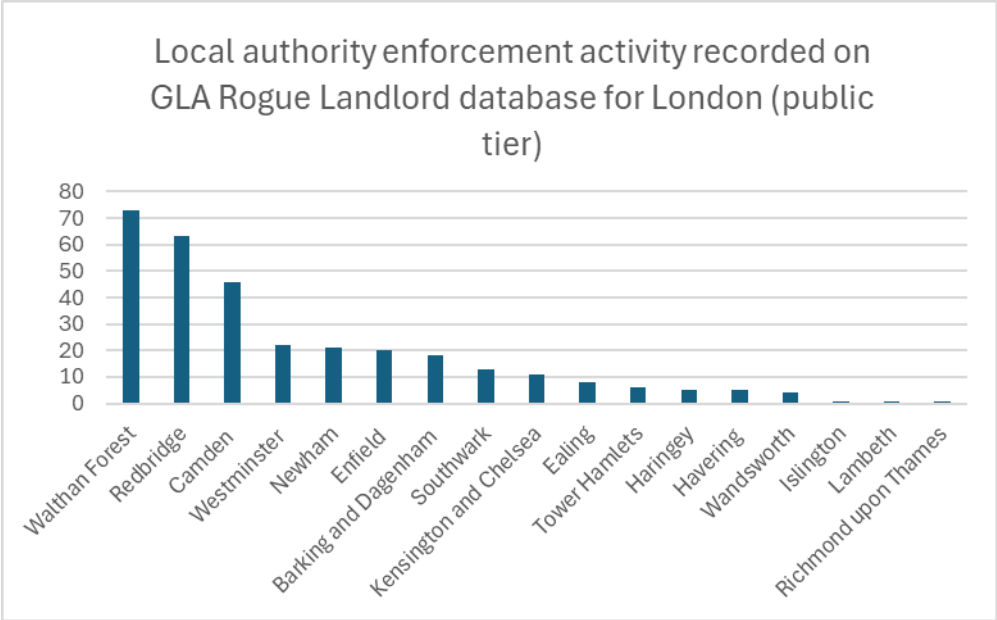
<b>Civil Penalty Notices – Fines issued</b>	<b>Since 1 April 2023</b>	<b>This year</b>
	£	
Net fines issued	2,367,662	£ 847,987
Collection rate since 1 April 2023	53%	

Table 8. HMO Licensing scheme 2020 to 2025

<b>HMO Licensing - 2020-2025 Scheme</b>	<b>Scheme 2025/26</b>	
Number of new applications received	5,625	619
Number of renewal applications received	2,087	208
Number of inspections completed	3,138	598
Number of licences issued	3,287	648
5-year licence	2,339	478

1-year licence	948	170
Compliance inspections completed	314	26

Chart 1.



## **Appendix 2**

### **Renters' Rights Act - Key impacts, actions, risks and resourcing needs**

#### **Impacts / New burdens**

1. Increase in section 21 eviction applications in run up to date that s21 evictions are abolished. Increased demand on Homelessness Initiatives Service.
2. Council may incur increased legal costs supporting residents challenging section 8 eviction notices.
3. Increase in Homelessness approaches and TA placements resulting from properties being found to be 'not suitable'
4. Increase in numbers in temporary accommodation due to reduced availability of suitable, affordable PRS properties to end homeless duties
5. New enforcement powers around tenancy reform, discrimination, redress and PRS Property Database, likely to fall within Trading Standards expertise/area. Could be considerable additional burden, need for additional resourcing moving forwards.
6. Potential confusion with process around Landlord Redress Scheme, where tenant could complain to local authority and redress scheme concerning the same issues. Will need guidance on relationship/communications moving forward.
7. Requirement to update PRS Property Database with all enforcement activity.
8. Decent Homes Standard – new enforcement burden, increases complexity of inspections to capture a wider range of data. Challenges with communicating new requirements to tenants and landlords. Challenge on when to enforce and under what legislation where there is significant overlap
9. Decent Homes Standard – proposal to extend to properties used for temporary accommodation. May lead to reduction in properties available to local authorities.
10. Expectation of increased enforcement activities. Need to review and consider additional resources, including enforcement officers and legal support.
11. New general duty on all local housing authorities to enforce the landlord legislation in its area. Main duty at present is restricted to Part 1 HHSRS enforcement, now expanded, with expectation that enforcement action will be taken.

12. Duty to report on enforcement activity; 52 indicators. Majority of indicators are quarterly, with remainder annual. Aim to ensure consistent enforcement nationally.
13. New investigatory powers (similar to existing Trading Standard powers) to request information. Now including bank, accountant and client money protection schemes. Includes power to enter suspected residential tenancy without a warrant.
14. Government has advised that there will be new burdens funding to support the introduction of the Bill, however, we are unlikely to learn what this might be until after the Bill receives Royal Assent. Expectation that local authorities will use fines collected from Civil Penalties Notices issued to meet additional resourcing needs moving forward.

### **Appendix 3 – Actions arising from impact and risk assessment of Renters' Rights Bill (now Renters' Rights Act 2025)**

1. Staff training on new legislation, duties and powers.
  - Likely need to be phased as reliant on secondary legislation, no clear timeline yet.
  - Bitesize chunks due to number of changes
  - Needs to address different audiences
  - Look to recycle for landlord and tenant information pages
2. Communications plan
  - Raising awareness for private renters – will need to be phased as some
  - Raising awareness for landlords, managing agents – will need to be staggered due to way the new bill will be implemented.
    - Landlord and managing agent forum
  - Review and updates of guidance published on web pages ([camden.gov.uk](http://camden.gov.uk) and Camden Private Renters)
3. Updating of enforcement policy to reflect new duties and powers
  - Wide ranging changes to scope of Civil Penalty Notices, including increases in maximum fines (up to £40,000)
  - Revision to CPN toolkit (assists officers with creating CPNs)
  - Legal support to review proposed changes to policy.
  - Sign-off of revised enforcement policy.
4. New enforcement duties and powers
  - Update, create new processes and guidance for officers
  - Incorporate into management information system (templates, codes)
5. Legal support for enforcement work
  - Increased duties to take enforcement action, with expectation that Civil Penalty Notices will contribute towards additional costs associated with the bill. Increased need in legal support for service, appeals etc.
6. Decent Homes Standard

- Proposal to come into force in 2035 (proposals subject to consultation)
- Opportunities to work with landlords to work towards compliance in lead up to implementation

## 7. Resourcing

- Increased duties to take enforcement action for wider range of offences, including PRS Database.
- Expectation that number of complaints received will increase as a result of abolition of section 21 evictions and less risk of retaliatory eviction.
- Despite suggestion of new burdens funding, clear that expectation is that additional resourcing should be funded by financial penalty income.
- Additional resourcing will initially be needed in reactive enforcement team and in Trading Standards (enforcement).
- Flexible approach can be taken with reactive enforcement, however challenges with national shortage of EHOs and all local authorities chasing limited resource. Continue with growing own. Additional pressures on training and coaching.
- Trading Standards (Housing) currently resourced via two part-time contractors. Need to look at expanding to 2-3 FTE's. Similar challenges to recruitment. Opportunities for looking at new job role (or amending existing job roles to take on this work).

## 8. Duty to report on enforcement activities

- Need to update current management information system to be able to capture and report on over 50 new indicators.
- Additional challenge as working on migrating to new Cloud system, which is also subject to delay.
- Deadline to implement by mid-2026.
- Opportunity to use QlikSense (or other business intelligence tool) to automate collation and reporting of quarterly data.