

**Homes and Neighbourhoods**

**Islington Council**

**222 Upper Street N1 1XR**

Report of: Corporate Director of Homes and Neighbourhoods

Meeting of: Housing Scrutiny Committee

Date: 18<sup>TH</sup> July 2024

Ward(s): **All**

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## Subject: Private Rented Housing Update

### 1. Synopsis

- 1.1. The purpose of this report is to provide information in relation to our current property licensing schemes.
- 1.2. Our property licensing schemes are intended to improve property conditions, management, anti-social behaviour (ASB) and crime, to create a clear and level playing field for the private rented sector across Islington. This is part of a wider programme of work to reduce the impact of poorly managed properties.
- 1.3. Feedback received during our most recent consultation exercise highlighted the need to report progress regularly throughout the scheme.

### 2. Recommendations

- 2.1. Members of the Housing Scrutiny Committee are asked to note the content of this report.
- 2.2. To note the progress made implementing property licensing in Islington.

## 3. Background

- 3.1. The Private rented sector now accounts for a third of housing in Islington and although many privately rented properties are satisfactory, a significant amount are not up to standard.
- 3.2. Our Private Rented Sector Charter sets out our commitment to stand alongside private renters and work with private landlords to maintain and improve standards.
- 3.3. Property licensing is one of the tools the council uses to help address inadequate housing standards, rogue landlords, anti-social tenants, and the impact of poor management. In an area subject to licensing, all private landlords must demonstrate that they are a 'fit and proper' person to let a property, obtain a licence and provide and manage accommodation to a reasonable standard. If they fail to do so, the council can take enforcement action.

### **Property Licensing Schemes**

- 3.4. There are three licensing schemes currently in operation in Islington.

Mandatory – a boroughwide scheme for Houses in Multiple Occupation (HMO's) covering five or more people from two or more household's sharing one or more basic facilities such as a bathroom and/or kitchen. This obligation has been in place across the country since 2006 and does not expire.

Additional – a boroughwide discretionary scheme adopted by the council commenced in February 2021, covering smaller HMOs occupied by 3 or 4 persons who are not members of the same household who share kitchen and/or bathroom facilities. It also includes properties converted into self-contained flats where the conversion work was not carried out in accordance with the Building Regulations 1991. Our additional scheme is due to expire in February 2026 unless a new scheme is approved.

Selective – a discretionary scheme adopted by the council February 2021 covering the old Finsbury Park ward boundary for single and two-person household properties or a single family. Our Selective scheme was expanded in May 2024 to cover the new Finsbury Park, Tollington, and Hillrise wards.

Licensing schemes run for a maximum of five years and a fee is payable for each licence.

## **The Benefits of Property of Licensing**

3.5. Property licensing helps us to regulate the condition and management of private rented properties in the borough. We license properties to:

- Improve property standards and management.
- Protect our residents from rogue landlords.
- Support the reduction of other problems being caused by poorly managed privately rented accommodation such as antisocial behaviour and waste management issues.

3.6. Property licensing helps deliver improvements by:

- Helping drive better management and faster resolution of issues.
- Identifying landlords who do not proactively manage property standards and struggle with other property management issues.
- Supporting the identification properties that are more likely to have serious hazards and are in need of regulation.
- Preventing criminal landlords from renting property to residents through the fit and proper test.
- Issuing shorter licences to landlords subject to enforcement action to encourage better management and apply additional licensing conditions. This closer monitoring ensures struggling landlords are forced to improve the management of their properties.
- Speeding up the process to get important repairs and maintenance completed.
- Reducing the burden of enforcement costs on other sectors.
- Allowing risk-based audits of licensing conditions to be checked to ensure hazards are properly managed. Obtaining and monitoring safety certificates to ensure common hazards and tenancy issues are addressed.
- Creating a level playing field for good landlords and penalising rogue operators.
- Promoting better engagement with landlords and agents.
- Allowing an intelligence led proactive approach to tackle poor housing conditions reducing the risk of vulnerable and isolated tenants who would otherwise not report issues to the council going unsupported.

## 4. Scheme Performance Summary

### Compliance and Unlicensed Properties

- 4.1. Significant effort has been made to encourage applications and bring properties into compliance during the first phase of the scheme.
- 4.2. As of the 1<sup>st</sup> April we have achieved a high level of compliance with 94% of our original estimated number of properties receiving applications.
- 4.3. The council has recommissioned its tenure intelligence modelling and will have updated estimated property numbers shortly.

Progress against estimates (up to 1<sup>st</sup> April 2024):

License type	Applications received	Original estimated number of properties	%
Additional (including S.257)	3,421	3,500	
Mandatory	538	700	
Selective	1,725	2,000	
Temporary Exemptions	159	n/a	
<b>Total</b>	<b>5,843</b>	<b>6,200</b>	<b>94%</b>

- 4.4. It is a criminal offence for landlords and managing agents to let out a property that is not properly licensed. Where such offences take place, the council may take enforcement action through criminal prosecution or in certain circumstances issuing a financial penalty of up to £30,000 per offence.
- 4.5. Tenants in unlicensed properties may make an application for a Rent Repayment Order (RRO) for which, if granted, may require the landlord to pay back up to 12 months rental income from the property.
- 4.6. Not having a licence may also affect a landlord's ability to legally evict a tenant.

## Landlord licence public register

- 4.7. The council maintains an easily accessible online public register of licensed properties and Temporary Exemption Notices. The register is updated automatically as property licences are issued.

The public register is available on our website and allows anyone to search by clicking here: [PRS Public Register](#)

Full address: <https://propertylicensing.islington.gov.uk/public-register>.

## Landlord and Managing Agent Accreditation

- 4.8. The council offers discounted fees for landlord and managing agents that have joined a recognised accreditation scheme to promote professional management of the residential rental sector.
- 4.9. Accreditation allows landlords and managing agents to demonstrate their knowledge, training, skills to manage properties and tenancies in line with best practice. They undertake continual professional development (CPD) in order to keep up with changes in the law, safety requirements and best practice.
- 4.10. Around 20% of applications received so far have been from accredited applicants, By January 2024 there were 1,734 London Landlord Accreditation Scheme (LLAS) accredited landlords which is an increase of 88% since 2018 and above average when compared to all London boroughs. The council plans to further promote the benefits of accreditation to landlords as part of our engagement work going forward.
- 4.11. Discounts may be refused for applicants that make late applications or where the council has served a warning letter for failure to license the property or has had to make multiple requests for required documentation.

## Proportion of accredited landlords

Licence Type	Additional	Mandatory	Selective
% Accredited	17%	29%	21%
<b>Overall</b>	<b>19% of all applicants so far have accreditation</b>		

## **Processing Applications**

- 4.12. The council has invested in a public facing IT system designed to make an online application process for landlords as quick and efficient as possible. The system provides some automation of back-office systems helping to keep our administration costs to a minimum and enables us to focus more resource on inspections, monitoring, and enforcement using tablet devices in the field.
- 4.13. The initial focus has been to bring landlords into compliance and a significant proportion of this time has been consumed chasing missing or unsatisfactory documentation and payments. The council is updating its advice and guidance pages and will be taking a stricter approach with regards to timelines for submission of applications and documentation.
- 4.14. Landlords are required to demonstrate through their licence application(s) that they, and anyone involved in the management of their property, meet the fit and proper person criteria, and that the management arrangements are satisfactory. Their application must be supported by plans of the property and certificates covering fire, gas and electrical safety, energy performance and the existence of a UK based property manager.
- 4.15. Properties must also meet minimum room sizes and welfare standards which limit the number of occupants that a property can accommodate legally, this helps prevent overcrowding and maintain welfare standards.
- 4.16. Tenancy agreements are also reviewed to ensure they meet the statutory requirements of the Tenants Fees Act. This act bans certain letting fees and caps tenancy deposits paid by tenants. It also helps ensure that tenants' deposits are placed in a tenancy deposit protection (TDP) scheme to ensure tenants are protected from excessive charges and deposit money is protected.
- 4.17. A licence can be granted for up to five years. The duration of each licence will in practice be determined on a case-by-case basis taking into consideration any history of non-compliance, poor property management and incomplete or unsatisfactory documentation. Such concerns will result in the licence period being reduced so that the council can monitor compliance more intensively. The landlord will then be required to make a new license before the original license expires, failure to do so could result in enforcement action.
- 4.18. The council aims to process valid applications where complete documentation and payments are made within three months. Our experience in the early part of the scheme is that much more time than was expected has been spent chasing documentation and payments to allow applications to be validated and granted.

The council is therefore adopting a stricter approach with firmer deadlines going forward to ensure timely processing of applications.

## Licence conditions

4.19. Conditions are applied to our licences in order to ensure:

- Licence holders take action to remedy the disrepair and/or infestation.
- Regular checks are carried out to the common parts, gardens and yards and they are free from waste, which could provide harbourage for pests and/or is a nuisance and/or is detrimental to the local amenities.
- Action is taken to prevent and deal with ASB.
- Adequate facilities for the disposal of refuse and recycling are provided, so that bags or loose refuse and recycling are not stored outside the property and any hazardous waste is disposed of in a safe and lawful manner.
- There is adequate fire protection including an adequate number of working smoke and carbon monoxide alarms which are installed in a room/s in the house and kept in proper working order.
- Properties are not over-occupied and have sufficient amenities for the number of occupants.

4.20. Over 50% of applications were received in the first 15 months of the scheme, the uptake in applications in 23/24 represents the enforcement activity undertaken to identify unlicensed premises.

## Application received by year.

<b>Licence Type</b>	<b>Year 1 2021-2022</b>	<b>Year 2 2022-2023</b>	<b>Year 3 2023-2024</b>	<b>Total</b>
Mandatory HMO	199	105	127	431
Additional HMO	1,985	528	602	3,115
Selective	743	260	676	1,679

S.257 HMO	106	25	24	155
*Temporary exemption	78	15	63	156
<b>Total applications</b>	<b>3,033</b>	<b>918</b>	<b>1,429</b>	<b>5,380</b>
	<b>56%</b>	<b>17%</b>	<b>27%</b>	

\*A temporary exemption notice (TEN) suspends the requirement for a licence for three months. This allows time to take steps to change the way a property is occupied – for example, when seeking planning permission to convert a house in multiple occupation (HMO) into a single-family dwelling, or if the property has been put up for sale.

The council can in certain circumstances issue a second TEN where it is likely the properties occupation will be sorted within that time.

The vast majority of licence applications result in a license being issued, however some are refused or withdrawn as the premises either does not require a licence or is not suitable for the style of occupation proposed. A license may be withdrawn if the property is sold or no longer rented. Applicants and interested parties also can also make representations on the conditions applied once the licence has been granted in draft form.

## Licensing Decisions

<b>Decisions</b>			
Applications refused	4	Licences varied	118
Applications withdrawn	175	Revocations and variations refused	3
Reduced term licences issued (1 year)	7	Temporary exemptions granted	134
Licences revoked	96		
<b>Representations</b>			



Representations made	518	Representations accepted	332
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### **Periodic Inspections (5-year inspections) and outcomes**

- 4.21. Compliance with the scheme is also measured by verification inspections. The council aims to inspect most premises at least once during the duration of a licence. The council aims to carry out at least one routine verification inspection during the lifetime of the licence. However, these inspections are allocated on a risk basis. So far nearly a third (32%) of licences have been subject to a verification inspection. Of these 25% have been found to be completely satisfactory, 11% have been found to be unsatisfactory and have required attention and 63% requiring some minor issues to be attended with over 1,100 hazards being identified and rectified.
- 4.22. Proactive inspection numbers were initially impacted by covid restrictions. In order to address this and maintain business as usual activity, additional inspection staff have been recruited on a temporary basis to meet the needs of our scheme. The team are now inspecting over 120 inspections a month. These levels are being monitored closely to ensure all targets are met by the end of the scheme.

### **Service Requests**

- 4.23. Over 300 service requests were received about licensed properties during this period over 70% of which related to the condition of housing including damp and pest issues. Most issues found were dealt with following our intervention via advice and warnings, 68 formal enforcement notices were served in other cases.

### **Enforcement of the Licensing Schemes**

- 4.24. Enforcement is risk based and considered undertaken with using a phased approach. Where there is a significant, imminent risk or another aggravating factor, officers may take immediate formal action in line with statutory requirements and protocols. However, in other cases they will work with landlords to resolve the issues through a staged process:
- Stage 1 – Ensure maximum compliance and apply licence conditions.
  - Stage 2 – non-compliance with the conditions will lead to further action either by service of a financial penalty and/or reduced licence duration.
  - Stage 3 – where there is repeated non-compliance or where the non-compliance is of a serious nature a prosecution will be considered along with revocation of the licence.

## **Unlicensed Property investigations**

- 4.25. The service received 160 referrals concerning properties operating without a licence, with over 50% being referred by residents and neighbours, 22% from external agencies and the remainder 28% from council services.
- 4.26. The outcome of concluded investigations was that 26% required no further action because either they did not require or already had applied for a licence, 42% made applications as the result of an intervention of which 3 required further formal action and 3 being resolved by informal action.
- 4.27. A project to identify further unlicensed properties in the borough is currently underway. A list of suspected unlicensed properties has been corroborated through analysis of multiple data sources such as the presence of a property on one of the three tenancy deposit schemes or previously had a Temporary Exemption.
- 4.28. The council has written to over 3,000 suspected unlicensed properties outlining the consequences of operating an unlicensed property and the action required. Over 120 applications have been received as a direct result so far. The next stage will be to carry out unannounced visits where no suitable response or application has been received. This will lead to enforcement action if they are found to be rented without a licence.

## **Civil Penalty Notices**

- 4.29. The Council is reviewing our approach to Civil Penalties in line with many other local authorities because of precedent set by a first-tier tribunal case and the draft Renters Reform Bill which is expected to impose a duty requiring local authorities to prosecute a range of new offences or issue 40 plus Civil Penalty Notices per year as a minimum.
- 4.30. Enforcement officers will be trained on any updated procedures.

## **Rent Repayment Orders**

- 4.31. A rent repayment order (RRO) requires repayment, of rent or housing benefit or housing costs element of universal credit paid in respect of a tenancy or licence, by a landlord/agent who has committed a particular offence set out in the Housing and Planning Act 2016.
- 4.32. Justice for Tenants report that £324,000 has been recovered for Islington tenants in the last 5 Years.

## 5. Other Private Sector Improvement Work

### **'Minimum Level of Energy Efficiency' (MEES)**

- 5.1. An energy efficient property is less likely to be affected by condensation, provided it is adequately ventilated. Condensation can cause damp and mould. The Domestic Minimum Energy Efficiency Standard (MEES) Regulations set a minimum energy efficiency level (energy performance certificate (EPC) band E unless an exemption applies) for domestic private rented properties.
- 5.2. Our Trading Standards team have carried out pro-active enforcement aligning with corporate priorities regarding improving housing standards in the PRS, climate emergency concerns, and the cost of living (for renters).
- 5.3. Advice letters were sent to landlords of all PRS properties that were believed to fall within the scope of MEES outlining the changes from April 2020. Where necessary landlords are expected to spend up to £3,500 on energy efficiency improvements to try to achieve at least an E rating. In certain circumstances, an exemption can be registered where the costs would exceed this amount or for example listed building status prevents improvements of this type.
- 5.4. Between April 2021 and 2023
  - The council checked 296 properties for compliance.
  - Issued 70 Compliance Notices
  - Issued 34 Financial Penalties totalling £51,300.
  - More than 30 properties that were not compliant are now MEES compliant as a direct result of our intervention.
- 5.5. Islington was one of the first local authorities to proactively enforce MEES and we are contacted by other LAs in London for advice about our proactive approach.

### **Client Money Protection, Tenancy Deposit protection and Tenant Fees Act**

- 5.6. Letting and property management agents in the private rented sector in England that hold clients' money must join an approved 'client money protection scheme'. These schemes make sure landlords and tenants are compensated if they cannot repay their money, for example if they go into administration.
- 5.7. Landlords must put deposits in one of three government-approved tenancy deposit schemes (TDP) within 30 days if they rent a home on an assured shorthold tenancy that started after 6 April 2007.

- 5.8. These schemes are there to ensure tenants get their deposit back where tenants meet the terms of their tenancy agreement, do not damage the property, and pay their rent and bills.
- 5.9. The Tenant Fees Act bans most letting fees and caps tenancy deposits (to maximum of 5 or six weeks depending on rental value) paid by tenants in the private rented sector with new or renewed tenancy agreements signed on or after June 2019.
- 5.10. The aim of the Act is to reduce the costs that tenants can face at the outset, and throughout, a tenancy. Tenants should be able to see immediately, what a given property will cost them in the advertised rent with no hidden costs.
- 5.11. An estate agent, letting agent or property manager dealing with residential properties must join an approved redress scheme. This allows a customer that has a complaint about service that cannot be resolved means to complain to the scheme.
- 5.12. During the current scheme the following notices have been served; 51 for client money protection, 29 for not belonging to an appropriate Redress Scheme and 21 for Tenant Fees Act offences.

- **Minimum Energy Efficiency Standards (MEES)**

The council have been proactively enforcing the MEES domestic requirement since 2021 when the regulations changed to require private rented sector properties to have an energy efficiency rating of E or higher (or register an exemption if applicable), evidenced by the EPC. We have issued 39 fines (financial penalties) ranging from £100 to £4000 (where the maximum is £5000).

- **Client Money Protection (CMP) Scheme**

Letting agents (and property managers) are required to protect client money (i.e., that of landlords and tenants). This means that, in the event of a letting agent becoming insolvent or, at worst, embezzling money, client money is protected. Since 2023, the council has issued 19 fines (monetary penalties) totalling £117,200. The fines range from £200 to £30,000 (the maximum penalty per offence). The lower fines are usually issued where the letting agent is not displaying, as required, the CMP certificate. Before a fine is issued we issue a Notice of Intent (NOI), but this does not always result in a fine as the NOI gives an opportunity for the letting agent to make representations. This process is illustrated by the fact that we issued 30 NOI's but only 19 fines.

- **Redress Scheme**

Letting agents must also belong to a Redress Scheme, which is an independent arbitrator of complaints that can award compensation to clients (landlords and tenants) payable by the letting agent. Since January 2023, the council has issued eight financial penalties totalling £15,750 where the letting agent did not belong to a scheme. The fines ranged from £50-£5,000. 14 NOI's were issued but only eight resulted in a fine.

- **Tenant Fees Act**

Another way to protect tenants is the Tenant Fees Act. The council adopted a proactive approach, with the prohibition on tenant fees where not exempted. Since January 2023 the council have issued 17 fines totalling £28,750, ranging from £150 to £14,000. The maximum fine, per prohibited fee, is £5,000.

5.13. The table below summarises the number and value of fines issued since April 2023 for CMP, RS, & TFA.

	Client Money Protection (CMP)	Redress Scheme (RS)	Tenancy Fees Act (TFA)
Number of Final Notices issued (i.e., fines)	19	5	8
Total value of fines issued since April	<b>£117,200</b>	<b>£5,700</b>	<b>£28,750</b>

### **Review and Expansion**

5.14. Local authorities are required to review the operation of a designation made by them from time to time. Work is currently being undertaken to review that data to see if areas of the borough currently not included within our three-ward selective licensing would meet the statutory requirements and would benefit from being covered by selective licensing.

5.15. Any selective licensing scheme that covers more than 20% of a borough's private rented sector will require approval from the Secretary of State for Levelling Up Housing and Communities.

## **6. Conclusion**

6.1. Licensing remains an important part of the council's overall strategy to provide a 'safe place to call home'. Licensing is not intended to be an end in itself, rather a means to an end that bolsters existing statutory powers. It is about improving management standards in the private sector in areas where improvements are needed, for the benefit of occupiers and the wider community.

- 6.2. Despite widespread promotion and knowledge, the council are still finding premises operating without a licence and these are often lacking good property management. It is worrying that 10% of licenced premises visited so far have been found unsatisfactory on inspection.
- 6.3. The government recognises that licensing may be a long-term strategy and that it will not provide instant solutions. The council is committed to driving ongoing improvement across the borough through these schemes.

## 7. Implications

### 7.1. Financial Implications

7.1.1. The property licencing schemes (Mandatory, Additional, and Selective) ran by the Council are all legally ringfenced, with all income raised spent on the management, administration, and enforcement of the licencing schemes. The property licencing schemes have generated a total of £4.496m since beginning in 2019/20. Total expenditure during this period has been £2.892m, with the remaining balance of £1.981m to be spent in full over 5 years until 2030/31. To date, the balance of income and expenditure is set out below:

Financial Year	19/20	20/21	21/22	22/23	23/24
<b>Income</b>	(£207,832)	(£551,085)	(£1,431,308)	(£1,105,679)	(£1,200,340)
<b>Expenditure</b>	£155,108	£268,298	£473,080	£602,428	£1,016,089
<b>Reserves balance</b>	(£52,724)	(£335,512)	(£1,293,740)	(£1,796,991)	(£1,981,242)

7.1.2. Income generated through civil penalties is restricted and ringfenced to be used to further the Council's statutory functions in relation to their enforcement activities covering the private rented sector, as specified in regulations.

Civil Penalty Income	23/24
CMP	115000
Redress	£4,000
TFA	£16,500
MEES	£5,500
Total	£141,000

7.1.3. The administration of Additional and Selective Licensing should be self-funding over the five-year licensing period. As most income is received in initial years any annual surplus is carried forward to subsequent years to fund monitoring and enforcement activities. Income is monitored and a team proportionate to the demand for the service employed.

7.1.4. There is no financial cost to the Council from the operation of the schemes.

## **8.**

### **8.1. Legal Implications**

8.1.1. Local authorities are required to review the operation of a designation made by them from time to time.

8.1.2. Selective and Additional licensing is discretionary and can be only implemented where the council is able to demonstrate that specific criteria have been met. Licensing schemes last for up to five years, after which they expire, unless they are renewed, following a further consultation process.

8.1.3. Any selective licensing scheme that covers more than 20% of a borough's private rented sector will require approval from the Secretary of State for Levelling Up Housing and Communities.

### **8.2. Environmental Implications and contribution to achieving a net zero carbon Islington by 2030**

8.2.1. Property Licensing Schemes are one of the few tools available to encourage landlords to reduce carbon emissions and as such make an invaluable contribution to the councils Net Zero ambitions and the Greener and Healthier mission.

8.2.2. Improving property and energy efficiency in the sector both reduces carbon emissions and also fuel poverty as tenants often need to rely of expensive forms of heating without homes having the benefit of insulation.

8.2.3. The administration of the schemes has some Environmental Implications in terms of paper use which can be mitigated by Landlords applying for apply for licence applications on-line and upload supporting documentation electronically. Enforcement Officers walk, cycle or use public transport when traveling to compliance and enforcement inspections.

8.2.4. The enforcement of a Minimum Energy Efficiency Standard of E across Islington's 35,000+ rental properties is an important step towards the enforcement of a higher standard (e.g., C+) when government legislation is finally implemented. This will

have a significant impact on the borough's carbon emissions and will reduce tenants' energy bills in advance of the provision of a low carbon heating solution

- 8.2.5. EPC F and G rated properties are the most energy inefficient of our housing stock. They impose unnecessary energy costs on tenants and the wider economy and can lead to poor health outcomes, with a resulting resource pressure on health services. These properties also contribute to avoidable greenhouse gas emissions.

Increasing the energy efficiency of our domestic rental stock can help:

- manage the energy costs of tenants, including those of some of the most vulnerable to the cold;
- improve the condition of properties and help reduce maintenance costs;
- lower demand for energy thereby smoothing seasonal peaks in energy demand, and as a result increase energy security;
- reduce greenhouse gas emissions.

### 8.3. **Equalities Impact Assessment**

- 8.3.1. The council must, in the exercise of its functions, have due regard to the need to eliminate discrimination, harassment and victimisation, and to advance equality of opportunity, and foster good relations, between those who share a relevant protected characteristic and those who do not share it (section 149 Equality Act 2010). The council has a duty to have due regard to the need to remove or minimise disadvantages, take steps to meet needs, in particular steps to take account of disabled persons' disabilities, and encourage people to participate in public life. The council must have due regard to the need to tackle prejudice and promote understanding.

- 8.3.2. An Equalities Impact Assessment is not required in relation to this report, because a full Impact Assessment was completed prior to introduction of the licensing schemes on 9/05/2023. The main findings were that licensing schemes would have either positive or neutral impacts on people with protected characteristics and from disadvantaged groups.

## 9. **Conclusion and reasons for recommendations**

- 9.1. The committee note the progress that has been made bringing properties into compliance with the licensing schemes and the wider work being undertaken to improve this area.
- 9.2. The committee note the intention to take a firmer stance to bring non-compliant premises into compliance.



- 9.3. The committee note the work being undertaken to look at wards currently not subject to selective licensing to see if they meet the statutory criteria and would benefit from being covered by selective licensing.

**Appendices:**

- Example private sector case studies.

**Background papers:**

None

**Final report clearance:**

Authorised by: Jed Young

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## 10. Appendices

Appendix 1 – Example Case studies of Private Housing Work