



# **Environmental Health**

# **Private Sector Housing Enforcement Policy**

**Version 1.0. October 2018**

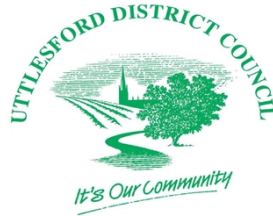
*Key information on this document*

Purpose: This policy is a general statement of the approaches to be taken regarding specific enforcement activities concerning Private Sector Housing. It has regard to Corporate Enforcement Policy and associated Service Standards.



## 1. Introduction

- 1.1 Uttlesford District Council (UDC)'s Environmental Health Service is responsible for the enforcement of a wide range of law (or statutory provisions) which is centred mostly on securing public health and safety, the regulation of the trading environment, housing, and the protection of the environment.
- 1.2 This policy outlines the service's approach for dealing specifically with private sector housing offences and links with the council's corporate vision to promote thriving, safe and healthy communities; specifically, to improve private sector housing conditions for UDC's residents.
- 1.3 The majority of landlords in Uttlesford provide well maintained properties, let responsibly. However, there are number of rogue and irresponsible landlords in the district who knowingly rent out accommodation that is unlicensed, sub-standard and/or unsafe.
- 1.4 The council aims to support the government's policy to support good landlords who provide decent well maintained homes, and avoid unnecessary regulation which increases costs and red tape for landlords and also pushes up rents for tenants.
- 1.5 The council is committed to making full use of the range of powers available to improve standards in Uttlesford's privately rented housing sector.
- 1.6 Since 6 April 2017, local housing authorities have had the power to impose civil penalties of up to £30,000 as an alternative to prosecution for certain specified offences. Rent repayment orders have also been extended to cover a wider range of offences.
- 1.7 Guidance issued by the Secretary of State requires each local authority to have a policy in relation to when civil penalties will be used, and what level of penalties will be imposed. It is expected that the maximum amount, of £30,000 will be reserved for the worst offenders. The actual amount levied in any case should reflect the severity of the offence as well as the landlord's previous record of offending.
- 1.8 This policy outlines how the council will use these powers, how it will decide when to prosecute and when to impose a civil penalty, and how it will determine the size of each civil penalty.



1.9 The policy is designed to ensure transparency, consistency and fairness in how and when civil penalties are imposed and complements UDC's Private Sector Housing Strategy 2017 -22 approved by Cabinet on 25<sup>th</sup> May 2017. The policy will therefore help the council to promote and support good landlords and deal robustly with criminal, rogue and irresponsible landlords.

## **2. Partnership Working**

2.1 It is acknowledged that landlords may have a property portfolio spread across different administrative council boundaries. In addition, when dealing with matters relating to housing enforcement, officers need to share information with the police, fire authority and immigration enforcement. Where possible the service will take a multi-agency approach for dealing with housing related offences.

## **3. Authorisation and delegation**

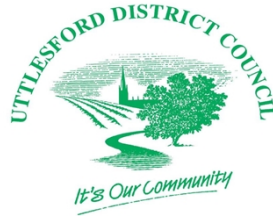
3.1 In relation to the legislation, part 3 of the council's constitution sets out the delegated authority to:

- commence a prosecution
- authorise named officers for enforcement

## **4. Training**

4.1 The Council will provide appropriate initial and updated training to all officers authorised to deal with private sector housing enforcement to enable officers to carry out their duties efficiently and effectively. This will include the following:

- (a) Minimum update training of 5 hours per year for continuing professional training.
- (b) Minimum of 10 hours revision training for authorised officers returning to private sector housing enforcement.
- (c) Minimum of three months monitoring of newly qualified or appointed officers or officers returning to environmental enforcement duties after an absence of more than 3 years.



## **5. Powers of Entry**

5.1 In certain circumstances, powers of entry into a property are provided to authorised officers. In general, the powers will allow an officer at any reasonable time to:

- Enter a property to carry out an inspection and gather evidence
- Take someone with them
- Take equipment or materials with them
- Take measurements, photographs or make recordings
- Leave recording equipment for later collection
- Take samples of articles or substances; and in some cases to carry out works.

5.2 In most cases prior notice must be given to owners and to the occupiers. The notice given depends on the legislation being enforced and can range from 24 hours to 7 days. Notice that powers of entry need to be carried out will normally be in writing or by email but can in some circumstances be given verbally, depending on the relevant statutory provision.

5.3 The powers of entry can be enforced with a warrant. The Police will accompany officers where that is appropriate. It is an offence to obstruct an officer in the course of their duty. Officers exercising their power of entry will carry identification and details of their authorisation to carry out their action.

5.4 Officers will have regards to the Home Office Code of Practice, Powers of Entry (December 2014). The Code provides guidance and sets out considerations that apply before, during and after powers of entry and associated powers are exercised including those circumstances where entry is exercised with the consent of an occupier.

## **6. Housing Enforcement Action**

6.1 In accordance with UDC's Corporate Enforcement Policy, the Environmental Health Service recognises and affirms the importance of achieving and maintaining consistency in approach to making decisions that concern regulatory enforcement action, including prosecution. To achieve and maintain consistency, relevant guidance and advice is always considered and followed where appropriate.

6.2 The Council will seek to secure compliance with regulatory legislation through the use of the following courses of action:



- Use of informal action, written guidance, advice and notices
- By refusal, revocation or the attachment of conditions to a licence
- By the use of various management orders
- By the use of statutory notices
- By issuing simple cautions
- By carrying out work in default
- By prosecution
- By the use of civil penalties
- By using anti-social behaviour powers
- By compulsory purchase or enforced sale.

## 7. Enforcement Decisions

7.1 Enforcement action will be based on risk and we must also have full regard to any statutory duty. Assessment of risk will be based on current legislation and specific guidance. Enforcement Officers are required to make informed judgements and will be suitably trained for this responsibility. They will decide on appropriate action after considering the criteria within this policy and any relevant written procedures. A senior officer will give prior approval to all formal action falling outside the scope of this policy.

7.2 The following table contains some examples of situations where different types of action may be taken. Decisions are made, however, on a case-by-case basis.

<b>Action</b>	<b>Circumstances</b>
<b>No Action</b>	Where formal action may not be appropriate. In such cases, customers may be directed to other sources of advice and support.
Informal action and advice includes verbal advice and advisory letters	Where it may be appropriate to deal with the issues through informal action and advice. In such cases, the pre-formal stage of the HHSRS may be followed, with the council working collaboratively with



	responsible landlords to address and resolve any problems.
Service of Notice requiring repairs or specific legal requirements	<p>Where a person refuses or fails to carry out works through the pre-formal HHSRS process;</p> <ul style="list-style-type: none"> <li>• Where there is a lack of confidence or there is positive intelligence that the responsible individual or company will not respond to a pre-formal approach;</li> <li>• Where there is risk to the health, safety and wellbeing of a household or a member of the public (dangerous gas or electrical services; no heating in the winter; no hot water for personal hygiene or to wash and prepare food safely; etc);</li> <li>• Where standards are extremely poor and the responsible individual or company shows little or no awareness of the management regulations or statutory requirements;</li> <li>• Where the person has a history of non-compliance with the council and/or other relevant regulators;</li> <li>• Where the person has a record of criminal convictions for failure to comply with the housing requirements (which may include housing management)</li> </ul>
Powers to require information and/or documents	Where it is necessary for documents and information to be provided to enable officers to carry out their powers and duties
Emergency Remedial Action / Emergency Prohibition Order	Where there is an imminent risk of serious harm to the health and safety of any occupiers and visitors of the premises or any other residential premises
Revocation of HMO Licences and Approvals	Where the Manager is not a “fit and proper person”; and/or



	where there are serious breaches of the licensing conditions and/or serious management offences.
Simple Caution	Where an offence is less serious and the person who has committed the offence has admitted their guilt. In such cases, a Simple Caution may be offered (as an alternative to Court or Civil Penalty action, and on the understanding that the Council's costs will be paid by the offender) where it is likely that they will heed a warning about their behaviour and the legal consequences if they commit further offences.
Civil Penalties	Where the authority considers the offence is suitable to be dealt with by a civil penalty (see 8 below)
Prosecution	Where the authority considers the offence is not suitable to be dealt with by way of a Civil Penalty or a Civil Penalty is not available for the type of offence.

## 8. Civil Penalties

8.1 The Housing and Planning Act 2016 enables local authorities to impose civil penalties as an alternative to prosecution for certain offences under the Housing act 2004.

8.2 In particular the relevant offences are;

- Section 30 of the Housing Act 2004 – Failing to comply with an Improvement Notice
- Section 72 of the Housing Act 2004 – Offences in relation to the licensing of Houses in Multiple Occupation
- Section 95 of the Housing Act 2004 – Offences in relation to the licensing of houses under Part 3 of the Housing Act 2004 (Selective Licensing of Residential Accommodation)
- Section 139 of the Housing Act 2004 – Offences in relation to the contravention of an overcrowding notice



- Section 234 of the Housing Act 2004 – Failure to comply with Management Regulations in respect of Houses in Multiple Occupation.

- 8.3 In deciding how to proceed, the council has to be satisfied that they have sufficient evidence to prove that an offence has been committed. This needs to be based on the criminal burden of proof, i.e. beyond reasonable doubt. In determining that the issuing of a civil penalty as opposed to prosecution is the appropriate course of action the council will consider each case individually and will take into consideration factors including the seriousness of the offence; the culpability of the offender; the harm, or potential harm to tenants; and the impact on the wider community.
- 8.4 In making a decision as to what, if any, enforcement action is appropriate the council will refer to the Corporate Enforcement Policy, and must also have regard to the Code for Crown Prosecutors. Due regard must also be given to any potential defences and it may be appropriate to undertake an interview under caution in accordance with the Police and Criminal Evidence Act 1984 (PACE) to explore this.
- 8.5 When the council is satisfied that a relevant offence has been committed and that it is in the public interest to proceed formally it must decide whether to prosecute or issue a civil penalty.
- 8.6 The following, whilst not exhaustive, are situations where prosecution may be appropriate;
- The offence was serious, for example breach of a prohibition order or where there was imminent risk of injury or loss of life;
  - The offender has been prosecuted for similar Housing Act offences
- 8.7 The following factors, whilst not exhaustive, are situations where the issuing of a civil penalty may be appropriate;
- No history of previous non-compliance with relevant legislation
  - No previous convictions of relevant offences
  - The offence was committed as a result of a genuine mistake or misunderstanding, but this must be balanced against the seriousness of the offence.





- Prosecution is likely to have a serious adverse effect upon the offender's physical or mental wellbeing, but this must be balanced against the seriousness of the offence.

8.8 The Housing and Planning Act 2016 also specifies that the amount of penalty that can be imposed is to be determined by the council but must not be more than £30,000. The Government's desire is that the penalty should be a punishment which has a real economic impact to the offender.

8.9 In determining the amount of penalty officers will use a Financial Penalty Matrix (see Appendix 1) which takes into account relevant matters including, but not limited to:

- The penalty should act as a deterrent to repeating the offence, and to others from committing similar offences;
- The penalty should remove any financial benefit obtained as a result of the commission of the offence;
- The severity and seriousness of the offence;
- The culpability and past history of the offender;
- The harm, or potential harm, caused to the tenant;

8.10 A guide outlining the approach to determine the correct penalty is provided within Appendix 2. The civil penalties range from £675 for low culpability, low severity and first offence situations to £30,000 for the most serious repeat offenders.

## **9. The Process for Imposing Penalty Charges**

9.1 Where it has been determined that a civil penalty as opposed to prosecution is the appropriate course of action the council will follow the following process:

- 1) A 'Notice of Intent' will be served on the person(s) responsible for the commission of the offence(s). The Notice will specify;
  - The amount of the proposed penalty
  - The reasons for the proposed penalty
  - Information relating to the right of the recipient to make representation to the council.
- 2) The recipient of the notice is given 28 days to make representation to the Council regarding the proposal to impose a civil penalty.



- 3) Following the 28 day period the council will decide whether to impose the proposed financial penalty and the appropriate amount. This could be varied taking into account any comments received from the recipients.
- 4) If the council decides that a civil penalty is still appropriate it will issue a final notice which will specify;
  - The amount of the financial penalty
  - The reasons for imposing the penalty
  - Information on how and when to pay the penalty
  - Information regarding the right of appeal against the imposition of a civil penalty to the First Tier Property Tribunal
  - The consequences of failure to comply with the notice

## **10. Consequences of non-payment and miscellaneous provisions.**

- 10.1 If the penalty charge is not fully paid within the prescribed time, including after an appeal has been finally determined and the charge upheld, the council will seek to recover the penalty by order from a County Court including the costs incurred in taking such action where deemed appropriate.
- 10.2 The council may at any time withdraw any notices it has served or amend the amount of penalty specified.

## **11. Links with the National Database of 'Rogue Landlords and Letting Agents'**

- 11.1 Upon the commencement of the statutory provisions contained in the Housing and Planning Act 2016 relating to the national Landlord and Letting Agent Database, where two final civil penalty notices have been issued to the same recipient within a 12 month period the council may make an entry on the database. When considering if this is an appropriate course of action the council will have regard to any guidance issued by the government.



## APPENDIX 1- Financial Penalty Matrix

### Civil Penalty Notice Charges for noncompliance of Improvement Notices / Management Regs / Breach of Licence Conditions

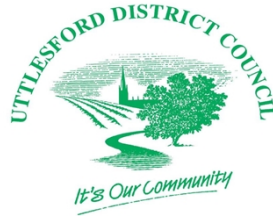
	1 <sup>st</sup> Offence	2 <sup>nd</sup> Offence	Subsequent Offence
<b>Low Culpability</b>			
Severity Level 3	£675	£1,350 ( See note on 1 )	£3250+50% of previous fine levels from all additional Culpability levels up £30K
Severity Level 2	£1,350	£2,700 ( See note on 1 )	£3250+50% of previous fine levels from all additional Culpability levels up £30K
Severity Level 1	£2,700	£5,400 ( See note on 1 )	£3250+50% of previous fine levels from all additional Culpability levels up £30K
<b>Medium Culpability</b>			
Severity Level 3	£1,350	£2,700 ( See note on 1 )	£7500+50% of previous fine levels from all additional Culpability levels up £30K
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<b>High Culpability</b>			
Severity Level 3	£2,700	£5,400 ( See note on 1 )	£15000+50% of previous fine levels from all additional Culpability levels up £30K
Severity Level 2	£5,400	£8,100 ( See note on 1 )	£15000+50% of previous fine levels from all additional Culpability levels up £30K
Severity Level 1	£10,800	£16,200 ( See note on 1 )	£15000+50% of previous fine levels from all additional Culpability levels up £30K

Note One – If more than one offence one hazard, breach of regulations or licence condition was on the notice/letter this figure can be doubled.

Note Two – Add preparation of file costs to the final amount must not total more than £30,000

Note Three - Early Omission of Guilt - 30% 1st Offence only

Note Four – Financial resources of the perpetrator must be taken into account



**APPENDIX 2- Guide to applying the Civil Penalty Fee Matrix**

# **Guide to Applying the Civil Penalties Fee Matrix**

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**Housing Act**

**2004**

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## Introduction to Relevant Legislation

**The Housing Act 2004** was amended by the **Housing and Planning Act 2016** to allow local authorities to impose a financial penalty as an alternative to prosecution for certain housing offences.

The list of offences that that may be dealt with by way of a financial penalty are as follows:

- Failure to comply with an Improvement Notice (Housing Act 2004 Section 30)
- Licensing of HMOs under Housing Act 2004 Part 2 (Housing Act 2004 Section 72)
- Licensing of houses under Housing Act 2004 Part 3, (Housing Act 2004 Section 95)
- Failure to comply with an Overcrowding Notice, (Housing Act 2004 Section 139(7))
- Management Regulations in respect of HMOs. (Housing Act 2004 Section 234)

In order to enforce the legislation Uttlesford District council have introduced a Fee Matrix.

The following guidance will assist officers with regards to determination of the appropriate penalty to be issued in each case.



## Applying the Matrix

The financial penalty should be fair and proportionate, with the objectives of punishment, deterrence and the removal of gain derived through the commission of the offence; it should not be cheaper to offend than to take the appropriate precautions.

The following guide is to assist with the use of the matrix it is however important to ensure that when deciding a fine you also make reference to government guidance <https://www.gov.uk/government/publications/civil-penalties-under-the-housing-and-planning-act-2016>

The matrix can be found as **Appendix A**

A worked example can be found as **Appendix C**

## Finding a Starting Point

### Stage 1

The starting point for a financial penalty is based on the number of previous penalty notices for the same type of offence has been committed in the previous four years. These are marked along the top of the matrix (highlighted in green)

Penalty Notice Charges for noncompliance of Improvement Notices / Management Regs / Breach of Licence Conditions

	1 <sup>st</sup> Offence	2 <sup>nd</sup> Offence	Subsequent Offence
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Severity Level 3	£1,350	£2,700 ( See note on 1 )	£7500+50% of previous fee levels from all additional Culpability levels up £30K



After the starting point has been determined, relevant premiums can be added to the starting amount to determine the full financial penalty to be imposed. This is done by taking into account the

- Culpability
- Severity level
- Number of hazards or breaches of regulations to which the action relates

## Determining Culpability

### Stage 2

The guidance requires that we take into account culpability

***“Culpability and track record of the offender. A higher penalty will be appropriate where the offender has a history of failing to comply with their obligations and/or their actions were deliberate and/or they knew, or ought to have known, that they were in breach of their legal responsibilities. Landlords are running a business and should be expected to be aware of their legal obligations.”***

The criteria below will help guide you. The Uttlesford matrix has three levels of culpability Low, Medium, High (highlighted in blue) to help ensure that we that we will apply the same criteria in each case.

Penalty Notice Charges for noncompliance of Improvement Notices / Management Regs / Breach of Licence Conditions

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## High

- Where the offender intentionally breached, or flagrantly disregarded, the law.
- Where the offender knew their actions were unlawful.
- Actual foresight of, or wilful blindness to, risk of offending but risk nevertheless taken.

## Medium

Offence committed through act or omission which a person exercising reasonable care would not commit.

- An example of this may be an agent or landlord that has attended training or you have previously supported through visit and advice. The majority of cases will generally fall within this category.

## Low

Offence committed with little fault, for example, because:

- significant efforts were made to address the risk although they were inadequate on this occasion
- there was no warning/circumstance indicating a risk
- failings were minor and occurred as an isolated incident



## Determining Severity

### Stage 3

Under each culpability level there three levels of severity

Penalty Notice Charges for noncompliance of Improvement Notices / Management Regs / Breach of Licence Conditions

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These levels of severity should be considered into relation to the offences of

- Failure to comply with an improvement notice
- Failure to comply with management regulations
- Failure to comply with licence conditions

The severity level categories below contain factors relating to both actual harm and risk of harm. When deciding the severity level it is important to take into account the relevant piece of legislation associated with the intended action.

#### Severity Level 1 – Highly Likely to Result in Harm

- The offence committed is highly likely/ is having a serious adverse effect(s) on individual(s) and/or resulting in a widespread impact.\*

*\*When considering action in relation to the offence of failure to comply with an Improvement Notice it is important to take into account where persons are within the vulnerable age group for the associated hazard (Appendix B)*

#### Severity Level 2 – Medium Likelihood of Harm

- Adverse effect on individual(s) not amounting to Severity Level 1



- Where there is a medium risk of an adverse effect on individual(s) or low risk of serious adverse effects

### **Severity Level 3 - Low Likelihood of Harm**

- Low risk of an adverse effect on individual(s)
- Little or no risk of actual adverse effect on individual(s)

## **Adding Costs**

### **Stage 4**

A file should be prepared in the same way as for prosecution. A **CPIA18** costs sheet should be created as cost need to be added to the final total.

## **Reductions**

### **Stage 5**

#### **Reduction for early admission of guilt**

The council may take into account a potential reduction in penalty for an admission of guilt on a first offence. The following factors should be considered in setting the level of reduction:

- The stage in the investigation or thereafter when the offender admitted guilt
- The circumstances in which they admitted guilt
- The degree of co-operation with the investigation

No reduction will be offered in relation to a second offence or for serious high culpability offences.

A maximum of 30% reduction can be made but this may be reduced if not all factors have been met.



## Reduction with regard to offender's ability to pay

The guidance requires that

***“Local Housing Authorities should use their existing powers to, as far as possible, make an assessment of a landlord's assets and any income (not just rental income) they receive when determining an appropriate penalty”.***

Gathering of this information therefore needs to be considered as part of as part of an ongoing investigation.

### Determining Subsequent Offences

The legislation allows us to take into account the number of times someone has committed an offence.

Use the Subsequent Offences Column on the table

- Always start with the worst offence even if it is not the most recent.
- Then add + 50% of the total value with regard to the next highest level offence from the subsequent offence column within the matrix
- Then add + 50% of the total value with regard to the next highest level offence from the subsequent offence column within the matrix
- Then CPIA18 file preparation cost fees from the current offence.
- The total amount should be capped at maximum level of £30,000



### **Example**

An agent has previously had a civil penalty notices for two low culpability offences and one high culpability offence.

Culpability High    £15000 (use the whole of this figure as the worst offence)  
Culpability Low    £7500 (Use 50% of this figure as a lower offence)  
Culpability Low    £7500 (Use 50% of this figure as a lower offence)

Cost for final file preparation £720

so the sum would be

£15,000 + £3250 + £3250 + £720 = Total fine £22,220

## **Failure to License**

Failure to license is an offence that can be dealt with via Civil Penalty Notice. This will be dealt with by a fixed fee based on the current calculated HMO licensing fee.

The fine is worked out

### **1<sup>st</sup> Offence**

The HMO licensing fee x 2 + additional charge per room (unit) x 2 + **CPIA18** file costs  
= Fine

### **2<sup>nd</sup> Offence**

The HMO licensing fee x 3 + additional charge per room (unit) x 2 + **CPIA18** file costs  
= Fine



## Appendices

### Appendix A

#### Penalty Notice Charges for noncompliance of Improvement Notices / Management Regs / Breach of Licence Conditions

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**Note One** – If more than one offence, one hazard, breach of regulations or licence condition was on the notice/letter this figure can be doubled.

**Note Two** – Adding preparation of file costs to the final amount must not total more than £30,000 (See stage 4 of guide)

**Note Three** - Early admission of guilt - 30% 1st Offence only (see stage 5 of guide)

**Note Four** – Financial resources of the perpetrator must be taken into account

## **Appendix B**

### **Vulnerable Age Groups Re: Different Hazards**

#### **(Age of Occupant)**

- Damp and mould growth 14 and under
- Excess Cold 65 or over
- Excess Heat 65 or over
- Carbon Monoxide 65 or over
- Lead under 3 years
- Personal Hygiene, Sanitation and Drainage under 5 years
- Falls associated with baths etc. 60 or over
- Falling on level surfaces etc. 60 or over
- Falling on stairs etc. 60 or over
- Falling between levels under 5 years
- Electrical hazards under 5 years
- Fire 60 or over
- Flames, hot surfaces etc. under 5 years
- Collision and entrapment under 5 years
- Collision and entrapment - low headroom 16 or over
- Position and operability of amenities etc. 60 or over

## Appendix C

### Worked Example

- The agent of a property has had no previous civil penalties served making it a first offence (Stage One).
- They have previously sent a plumber and have not properly followed up to see if the problem has been resolved so this could be considered **medium culpability (Stage Two)**.
- The flat is in otherwise good condition; the occupants are not in the vulnerable age group and can get some heat from the electric fire. So this may be consider **Severity level two (Stage Three)**
- They have failed to repair a heating system resulting in a breached Improvement Notice. They have admitted that they have been slow to resolve the problem but not they are guilty of the offence so **No early omission of guilt (Note three)**
- There is no evidence to reduce the fine due for financial resources (**Note four**)

Civil Penalty Notice Charges for noncompliance of Improvement Notices / Management Regs / Breach of Licence Conditions

	1 <sup>st</sup> Offence (1)	2 <sup>nd</sup> Offence	Subsequent Offence
<b>Low Culpability</b>			
Severity Level 3	£675	£1,350 ( See note on 1 )	£3250+50% of previous fine levels from all additional Culpability levels up £30K
Severity Level 2	£1,350	£2,700 ( See note on 1 )	£3250+50% of previous fine levels from all additional Culpability levels up £30K
Severity Level 1	£2,700	£5,400 ( See note on 1 )	£3250+50% of previous fine levels from all additional Culpability levels up £30K
<b>Medium Culpability (2)</b>			
Severity Level 3	£1,350	£2,700 ( See note on 1 )	£7500+50% of previous fine levels from all additional Culpability levels up £30K
Severity Level 2	£2,700 (3)	£5,400 ( See note on 1 )	£7500+50% of previous fine levels from all additional Culpability levels up £30K
Severity Level 1	£5,400	£10,800 ( See note on 1 )	£7500+50% of previous fine levels from all additional Culpability levels up £30K
<b>High Culpability</b>			
Severity Level 3	£2,700	£5,400 ( See note on 1 )	£15000+50% of previous fine levels from all additional Culpability levels up £30K
Severity Level 2	£5,400	£8,100 ( See note on 1 )	£15000+50% of previous fine levels from all additional Culpability levels up £30K
Severity Level 1	£10,800	£16,200 ( See note on 1 )	£15000+50% of previous fine levels from all additional Culpability levels up £30K

Note One – If more than one offence one hazard, breach of regulations or licence condition was on the notice/letter this figure can be doubled.

Note Two – Add preparation of file costs to the final amount must not total more than £30,000

Note Three - Early Omission of Guilt - 30% 1st Offence only

1. It's a first offence

2. Medium Culpability

3. Severity Level 2

- No early omission no discount
- No financial resources reduction

The fine level would be £2700 + cost of preparing file (CPIA18) cost £960 =  
**£3660**