

Appendix 1: Review of Additional and Selective Licensing Schemes

1. Introduction

- 1.1. Following an extensive public consultation between November 2018 and January 2019 Slough Borough Council approved two discretionary property Licensing Schemes under Parts 2 and 3 of the Housing Act 2004, to compliment the UK wide Mandatory Licensing scheme for Houses in Multiple Occupation (HMOs) which has been in place since 2006.
- 1.2. The following licensing schemes are in operation in Slough:
 - Mandatory Licensing- This is a UK wide scheme that requires most HMOs with 5 or more occupants to be licensed.
 - Two discretionary schemes:
 - Additional Licensing- This scheme applies to the whole of Slough borough and includes all HMOs which are not covered by the Mandatory Licensing Scheme (this scheme ceases operating on 30/4/2024)
 - Selective Licensing- This applies to a specifically designated area (most of what was previously Chalvey and Central Wards) and covers all accommodation rented via and Assured shorthold tenancy or licence to occupy which is not an HMO i.e., let to one household (this scheme ceases to operate on 30/4/2024)
- 1.3. The discretionary schemes were introduced to facilitate the improvement of housing conditions and tackle poor property management which was shown to be contributing to higher rates of ASB in areas with a high density of privately rented accommodation and HMOs.
- 1.4. Crucially, licensing allows the cost of regulating the private rented sector to be borne by those profiting from operating in it.

2. Background

- 2.1. There are statutory conditions that must be met before a Local Authority can make an additional HMO or Selective Licensing designation they are:
- 2.2. Before making an additional HMO licensing designation for a particular area, the local authority must: -
 - Consider that a significant proportion of the HMOs in the area are being managed sufficiently ineffectively as to give rise, or likely to give rise, to problems either for those occupying the HMOs or for members of the public.
 - Consider whether there are any other courses of action available to them that might provide an effective method of dealing with the problem(s) in question.
 - Consider that the making of the designation will significantly assist them to deal with the problem(s)
 - Have taken reasonable steps to consult persons who are likely to be affected by the designations and consider any representations made.
- 2.3. Before making a selective licensing designation for a particular area, the local authority must show the circumstances meet the following: -

- The area has a high proportion of property in the private rented sector i.e., 20% or more. Central and Chalvey wards have a high proportion of PRS (over 50%).
 - A significant and persistent problem caused by anti-social behaviour or poor housing conditions.
 - Consider whether there are any other courses of action available to them in achieving the objectives that the designation would be intended to achieve.
 - Consider that the making of the designation when combined with other measures taken by the authority will significantly assist them to resolve the problem identified.
 - Have taken reasonable steps to consult persons who are likely to be affected by the designations and consider any representations made.
- 2.4. In 2018, Stock Modelling was undertaken by consultants Metastreet Ltd, which generated estimates about the size and nature of the private rented sector in Slough.
- 2.5. The stock modelling evidenced that in Slough a higher-than-average proportion of the housing stock is privately rented (>30% compared to 20% English average) and demonstrated a relationship between high concentrations of privately rented accommodation and HMOs, poor housing conditions and the occurrences of anti-social behaviour (ASB).
- 2.6. A 12-week public consultation was undertaken beginning in November 2018, which informed the design of the schemes, including the licence conditions, fees and property standards.
- 2.7. In March 2019 Cabinet approved the proposed schemes; the designations were made and publicised, and in July 2019 they became operative. [Slough borough additional HMO licensing designation – Slough Borough Council](#) and [Chalvey and Central Wards Selective designation notice – Slough Borough Council](#)
- 2.8. The Council made a commitment to refrain from enforcing the requirement to licence under the discretionary schemes until October 2019, allowing time for the schemes to be advertised, and to give landlords an opportunity to seek advice and assistance in making their applications.
- 2.9. Section 63 of the Housing Act 2004 allows the Council to require licence applications be accompanied by a fixed fee, to cover the costs of delivering the schemes and processing applications. In Slough, licensing fees were based on estimated costs of delivery. However, when the schemes were finally approved in March 2019, an ‘early-bird’ discount was included, to encourage landlords to apply before 31st October 2019, the end of the enforcement amnesty. It was acknowledged when the schemes were approved at Cabinet in 2019, that the discount could undermine the Council’s ability to recover the full costs of administering the scheme.
- 2.10. Table 1 shows the fee structure until 31st March 2024. Fees are charged in two parts reflecting the requirements arising from case law in (*R (on the application of Hemming (t/a Simply Pleasure Ltd)) v Westminster City Council (2017)*) and *R(Gaskin) v LB Richmond Upon Thames (2018)* EWHC 1996 (Admin).

Table 1: Licensing fees 2019-2024

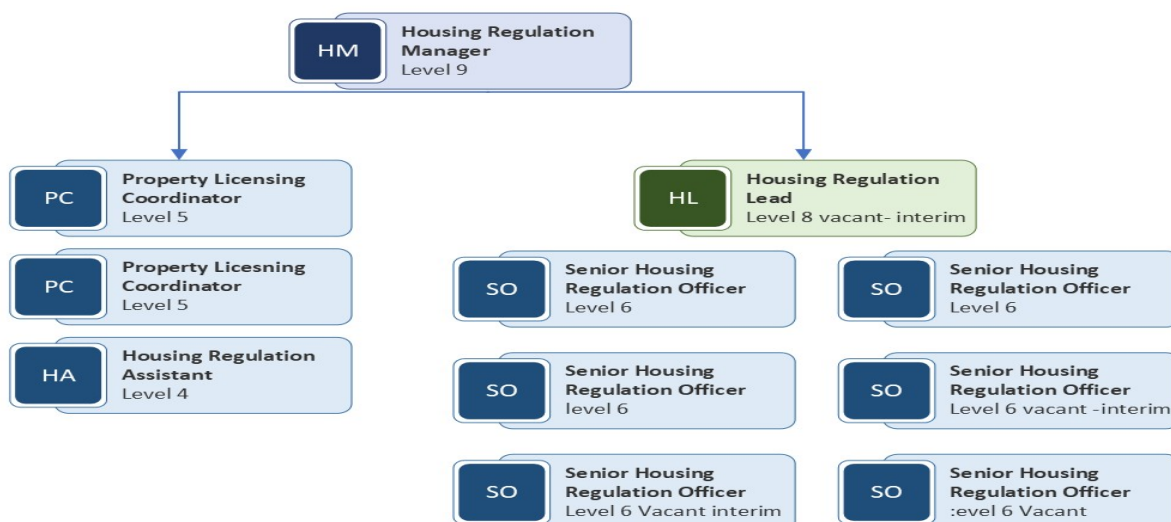
	Part A	Part B
Selective	£200	£300
HMO (Mandatory and Additional)	£550	£300

2.11. Fees can only be used to fund the delivery of property licensing, and for no other purpose.

3. Resources

- 3.1. The housing regulation team is responsible for the delivery of property licensing schemes in Slough. The current structure of the team is illustrated in Figure 1
- 3.2. The structure of the team has changed throughout the course of the schemes, and the team has moved between Directorates. The housing regulation team now sits within the Public Protection Service within the Public Health and Public Protection Directorate.
- 3.3. Throughout the 5-year scheme the housing regulation team have struggled to retain and recruit competent staff. There is a national shortage of qualified Environmental Health Practitioners ([LGA Skills Partnership Hub programme 2023/24 | Local Government Association](#)) Furthermore, neighbouring authorities offer higher salaries for roles similar to those in housing regulation.
- 3.4. Between 2021 and 2023 the team lost 5 permanent members of staff and despite numerous recruitment exercises only one of those posts has been permanently filled. One of the 3 vacant senior housing regulation officer roles is currently filled by interim.
- 3.5. A new level 8 housing regulation lead was created in 2023, replacing one of the senior officer posts, however this post is also vacant and covered by an interim member of staff.
- 3.6. The cost of interims in this area, prohibits the recruitment of temporary staff to all vacancies using interims, leaving the team under resourced. The cost to the Local Authority of employing an Interim housing regulation lead (L8) is around £56 per hour and for a Senior Housing Regulation Officer (L6) the cost per hour is around £53. The cost of equivalent permanent staff is around £32 for Lead and £30 for a senior housing regulation officer (inclusive of market supplement). These costs do not include overheads e.g. IT, travel costs, accommodation etc.
- 3.7. The separation of the team, to create a dedicated resource for licensing was trialled, however the loss of 5 officers in quick succession rendered the approach unsustainable.

Figure 1: Housing Regulation Team structure chart



4. Performance Information

- 4.1. The following section provides summary data relating to the delivery of discretionary licensing in Slough. For completeness, data relating to Mandatory Licensing of HMOs is also included. The data relates to the period between 1st April 2019 and 12th March 2024, unless otherwise stated. The data is preliminary and is subject to change following further detailed analysis; however, changes are likely to be marginal in most cases.
- 4.2. The data was taken from Slough Borough Council's property licensing application software 'Metastreet', and legacy case management system Civica App. The data taken from Civica App is likely to be less reliable due to practical limitations of the legacy case management system and some inconsistent recording of data.
- 4.3. **Time taken to Determine Licence Applications**
- 4.4. The housing regulation team aims to process licence applications within 90 days of a valid application being submitted. An application will only be deemed valid if it is accompanied by all mandatory information as specified in The Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006, and payment of the correct fee.
- 4.5. It is a limitation of the Council's application software that the Council is not able to distinguish at the point of application, whether a licence application is valid, and the system accepts the application and payment of the licensing fee, if all mandatory fields have relevant data in them. It is not until the property licensing coordinators begin processing applications, that they are identified as incomplete.
- 4.6. The quality of licence applications varies widely. Where applications are incomplete the Council could simply refuse to accept the application and refund the applicant's fee. However, this seemed to be an unhelpful approach that undermined the Council's commitment to help good landlords achieve compliance. Instead, where applicants omit a small amount of information, or contain limited errors, the Council writes to the applicant, requesting any outstanding information and, only where the applicant fails to respond positively, will the Council refuse the application and treat the property as an unlicensed. The Council continues to return applications that are incomplete.
- 4.7. This approach, though pragmatic, and helpful to applicants, has led to licence processing times in excess of those originally estimated, with an associated increase in costs. Figure 2 shows that of all licences issued since January 2019, only 32% were issued within 90 days of an application being submitted.

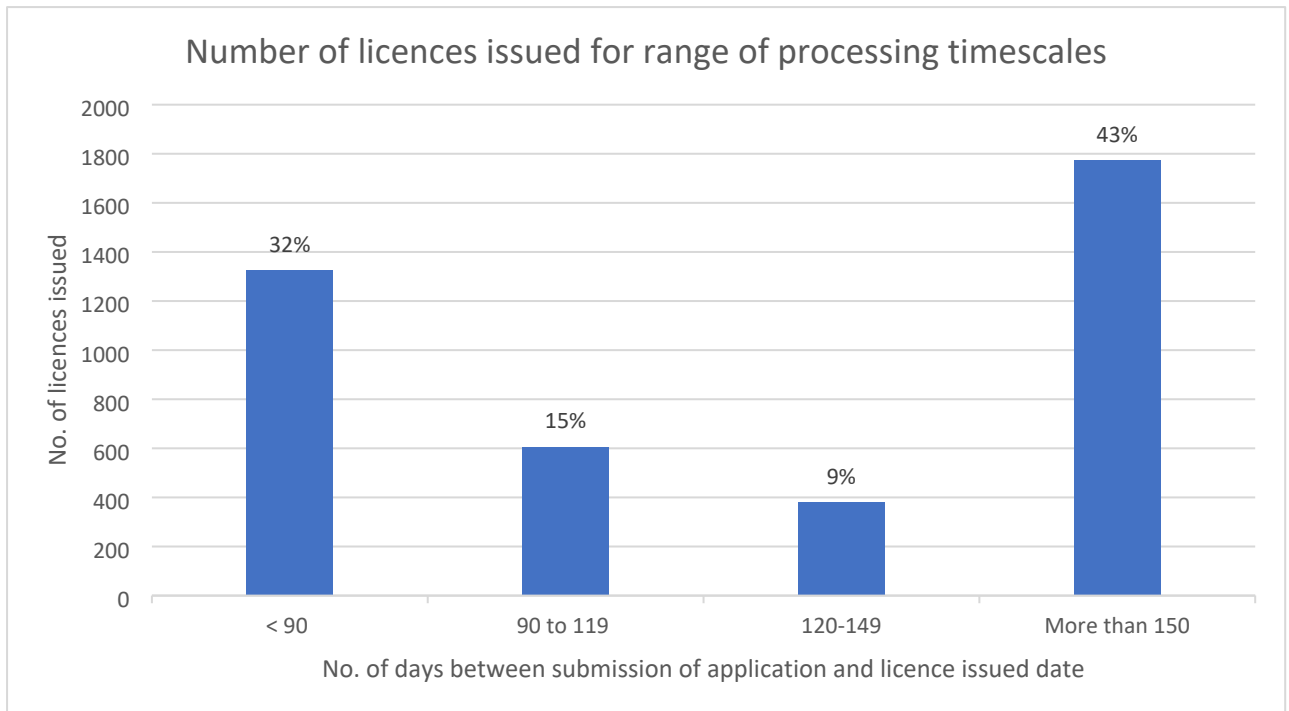


Figure 2 Illustrates of those applications that resulted in a licence being issued, the number and proportion processed within a range of timescales, measured from application submission to licence issue. Processing times for applications that were refused by the Council or withdrawn are not included in this data.

4.8. Licence Applications and Licensing Decisions

4.9. Data derived from stock modelling estimated that:

- Slough has approximately 3500 HMOs
- In the area eventually designated for selective licensing, there are approximately 3700 rented properties that are not HMOs. **It should be noted that confidence in the estimates relating to the number and location of HMOs is lower than for private rented sector estimates.**

4.10. Table 2 shows the number of licence applications received and number of licences issued for each year since the beginning of the Selective Schemes. The data pertaining to properties licensed under the Selective scheme, very closely reflects the estimates about the number of privately rented properties in the designated area. The Council has a statutory responsibility to do all that is reasonable to ensure that properties required to be licensed in Slough, are licensed and this data indicates that the Council has done particularly well in fulfilling this obligation.

4.11. The number of HMO licence applications falls significantly short of the estimated number of HMOs and there several possible reasons. Firstly, the level of confidence in the data relating to the number of HMOs is much lower than for privately rented property more generally, as such it is possible that there are far fewer HMOs than was originally predicted.

4.12. Secondly, unlike with other privately rented property, the person liable for Council tax for an HMO is usually the landlord; as such it is far more difficult to identify HMOs from

data alone, and unlicensed investigations are far more complex and time consuming to conduct than they are for properties licensable under the Selective scheme.

- 4.13. Thirdly, occupants of HMOs are more likely to be young single people, often non-British nationals, who may not be fully aware of their rights, or be eligible for housing or other assistance. Consequently, they are reluctant to cooperate with investigations for fear of retaliatory eviction.
- 4.14. Finally, HMOs are more likely to be used by criminal or ‘rogue’ landlords as they are highly profitable, can be used to house large numbers of people, and in extreme cases can be used to facilitate serious criminal activity as such there is a strong incentive for landlords of these properties to evade detection by the Council.

	2019	2020	2021	2022	2023	2024	Total
Additional HMO licence	25	35	36	31	8	6	141
Mandatory HMO licence	40	87	82	100	63	13	385
Selective licence	634	1351	745	500	292	41	3563
	699	1473	863	631	363	60	4089

Table 2 Number of Licences issued by type each year since 2019.

- 4.15. Table 3 shows the number of licensing decisions made by the Council for the property licence types since 1st April 2019. The Council’s Licensing Decisions Policy which is available on the Council’s website sets out how the Council arrives at its decisions, and the matters considered relevant when determining applications. [Licensing decisions policy \(slough.gov.uk\)](https://www.slough.gov.uk/licensing-decisions-policy).

	Additional HMO licence	Mandatory HMO licence	Selective licence	Grand Total
Grant licence	143	479	3569	4191
Refuse to grant licence	1	2	1	4
Revocation	6	30	122	158
Variation	5	20	67	92
Withdraw application	8	30	95	133
Total number of decisions	163	561	3854	4578

Table 3: Number of each type of licensing decision taken since April 2019 across all types of property licence.

4.16. **No. of reduced term licences**

- 4.17. Where the Council has concerns about the management of a licensable property, but those concerns don’t warrant an outright refusal of the licence, the Council can issue a licence for a reduced term, to give the proposed licence holder or manager and opportunity to improve their management, or consider alternative arrangements i.e., commissioning a competent, accredited Managing Agent. Table4 provides figures on the number of licences granted for a reduced term against those issued for the maximum duration of 5 years.

Licence Type	Reduced Term	5-year Licence	Grand Total
Additional HMO licence	5	136	141
Mandatory HMO licence	5	380	385
Selective licence	8	3555	3563
Grand Total	18	4071	4089

Table 4 Number of licences issued for a reduced term and for 5 years for each licence type.

4.18. **Enforcement of Licensing Requirements**

4.19. Operating an HMO or house required to be licensed without a licence is an offence under sections 72 and 95 of the Housing Act 2004.

4.20. Interventions to improve compliance with the requirement to licence vary in scale, Single correspondences are sometimes sufficient to achieve compliance, other cases involve complex criminal investigation and the issuing of criminal or civil sanctions.

4.21. Many of the properties identified as being unlicensed, will also have other deficiencies, or breaches of legislation that officers will be required to deal with, and priority is always given to ensuring accommodation is safe, irrespective of the licensing status of a property.

4.22. Table 5 shows the number of unlicensed properties discovered by officers since April 2019. The reactive data relates to the number of unlicensed properties identified through investigations in response to complaints or referrals.

4.23. The proactive data shows the number of properties operating without the required licence, which were identified as a result of officer's pro-active investigations, utilising for example council tax records, National Anti-Fraud Network, and other publicly available data and information. Many of these investigations were conducted during Covid lockdowns where the ability to undertake physical inspections was severely restricted.

	Reactive	Pro-active	Grand Total
No. of unlicensed HMOs identified	30	105	135
No of unlicensed Houses (selective) identified	30	503	533

Table 5 Number of properties identified as operating without the required licence as a result of officer activity and interventions.

4.24. **Inspections and Improvements**

- 4.25. Resources and competing demands have prevented the Council from conducting a physical inspection of every licensed property, but it is possible to monitor and improve compliance without attending the property.
- 4.26. A risk-based approach is taken to prioritising inspections, and the Council's Licensing Decisions Policy sets out in more detail the circumstances under which inspections are undertaken.
- 4.27. Table 6 lists the number of licensed or licensable properties, which have been inspected or are due to be inspected imminently (allocated to an officer with an open case) since 1st April 2019. The Inspections may have been undertaken as part of an investigation into licensing offences, to inform a licensing decision, or as a compliance audit during the operative period of a licence.

Licence Type	No of properties audited
Additional HMO licence	49
Mandatory HMO licence	204
Selective licence	255
Grand Total	508

Table 6 Number of inspections of licensed or licensable properties since January 2019

- 4.28. 351 properties licensed under the Selective Scheme have been audited using Gas Safety Records, Electrical Installation Certificates, tenancy agreements, and other documentary evidence which licence holders are required by their licence, to retain. A further 113 audits are underway in HMOs licensed under the Additional scheme.
- 4.29. The Council is satisfied that of the completed audits, 209 properties are now fully compliant. The remaining 142 are either partially compliant or non-compliant and officers are taking steps to ensure compliance is achieved. Where audit outcomes indicate wider concerns about management, or there is a lack of engagement from the licence holder, properties are referred to housing regulation officers for a full inspection.

4.30. **Improvement in Housing Conditions**

- 4.31. When inspecting licensed properties, housing regulation officers undertake an assessment using the Housing Health and Rating System (HHSRS). The HHSRS is the legally prescribed assessment method for identifying and scoring housing related hazards such as fire and electrical hazards, excess cold, damp and mould, and various fall hazards [Housing Health and Safety Rating System \(HHSRS\) guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/401242/HHSRS_guidance.pdf).
- 4.32. A numerical score is calculated for each hazard that is worse than average for the age and type of dwelling and the score is used to categorise the hazards into Category 1 (most serious) and Category 2 hazards. The Council has a statutory obligation to take one of a range of formal interventions to address Category 1 hazards, and a discretionary power to deal with category 2 hazards.

- 4.33. The housing regulation team have removed 451 category 1 hazards and 1317 category 2 hazards from all property types since April 2019. Of those, for Category 1 hazards 135 were in licensed or licensable properties and for Category 2 hazards 653 were in licensed or licensable properties.
- 4.34. The 5 most identified hazards in properties licensed or licensable under the selective scheme are:
- a) Damp and Mould
 - b) Electrical hazards
 - c) Excess Cold (most identified Category 1 hazard)
 - d) Fire
 - e) Food Safety
- 4.35. The 5 most identified hazards in licensed and licensable Houses in Multiple Occupation are:
1. Fire (most identified Category 1 hazards in Licensed and licensable HMOs)
 2. Excess Cold
 3. Damp and Mould
 4. Food Safety
 5. Electrical safety
- 4.36. Table 7 shows the number of licensed or licensable properties from which hazards have been reduced or removed as a result of intervention by the housing regulation team since April 2019. The data is likely to underestimate the number of hazards removed as there have been some inconsistencies in data recording as officers have left the authority.

Column1	Number of Additional Properties	Number of Mandatory Properties	Number of Selective Properties	Total
Cat. 1 Hazards removed	5	28	48	81
Cat. 2 Hazards Removed	11	43	91	145

Table 7 no of each licensed property type from which Category 1 and category 2 hazards have been removed.

- 4.37. Licensing presents an opportunity to achieve other improvements in housing conditions for example through the imposition of licensing conditions and the enforcement of Management Regulations (The Management of Houses in Multiple Occupation (England) Regulations 2006).
- 4.38. Unfortunately, it has not been possible to routinely collect data relating to these improvements in Slough due to limitations with the Council's legacy case management system. Consequently, a complete quantitative assessment of the positive impact of licensing is difficult to achieve.
- 4.39. **Formal Actions**
- 4.40. Where circumstances require, the Council uses the full range of enforcement powers to achieve compliance with legal requirements and to protect the health

and well-being of residents. The Housing Regulation Enforcement Policy sets out how decisions relating to enforcement are made.

- 4.41. Where formal action is required, licensing can expedite enforcement as proposed licence holders are required to provide full contact information for themselves and any interested party e.g., managing agent, freeholder when they make their licence application.
- 4.42. Table 8 lists the number of formal Notices and Orders issued by the housing regulation team across different licensed property types. This data includes notices served under the Housing Act 2004, such as Improvement Notices, Prohibition Orders, Emergency Remedial Action Notices. The data does not include notices issued for the purpose of investigation, e.g., requisition for information.

No. of notices and orders	
Selective	64
Additional	28
Mandatory	18
non-licensed	176
Total	286

Table 8 number of formal enforcement notices served for each property licence type since 1st April 2019

- 4.43. The most common type of enforcement action undertaken in relation to licensed properties was the issuing of an Improvement Notice requiring works to be undertaken to remove hazards. These are often, though not always issued following an unsuccessful informal intervention. Unfortunately, it was necessary to make 7 Emergency Prohibition Orders in relation to licensed or licensable properties, these are only used where there is an imminent and serious risk to occupants that cannot practicably be removed.

4.44. **Prosecutions and Civil Financial Penalties**

- 4.45. The housing regulation team undertakes enforcement in relation to a range of criminal offences, several which relate directly to licensing. The majority of the offences are summary only and are prosecuted in the Magistrates Court. The Housing and Planning Act 2016 gave local authorities the power to use Civil Financial Penalties as an alternative to prosecution. Unlike with Court fines civil financial penalties can be retained by the Council but only if they are invested in further enforcement of housing standards.

- 4.46. The Council has issued the following civil financial penalties, the majority of which relate to licensing, £76250 has been recovered:

- i. In August 2018 a landlord was issued a civil financial penalty of £22.5K for operating a property required to be licensed without a licence and breaches of management regulations relating HMOs. The landlord was allowed to pay in instalments. Unfortunately in this case further enforcement action became necessary and eventually the landlord was prosecuted.
 - ii. In November 2018 a £37K civil financial penalty was issued to landlady for breaching multiple management regulations relating to HMOs. The Council pursued the payment through the County Court, eventually recovering the full amount plus costs when the property was sold.
 - iii. In October 2019 a Company was fined £5000 for failing to comply with an Improvement Notice issued in relation to a flat near Slough High Street. Although the offences are not directly related to licensing the property to which the improvement notice related was a licensed flat. The landlord subsequently carried out the required repairs and the fine has been paid in full.
 - iv. In June 2020 a managing agent was fined £8500 for operating a property on Slough High Street, required to be licensed under the selective scheme, without a licence. The property was subsequently subject to a licence application and the fine was paid in full.
 - v. In October 2020 a landlord was fined £6500 for operating a property required to be licensed, without a licence. A licence application was subsequently made, and improvements were also made to the dwellings. The fine has been paid in full.
 - vi. In August 2021 the landlord of an HMO was fined £5250 for operating the property without a licence. A licence application has since been made and the fine is being paid in instalments by agreement with the Council.
 - vii. In 2023 a landlord was issued a £25K penalty for failing to comply with an Improvement Notice issued in relation to a property in Rochfords Gardens. The Civil Financial Penalty was appealed, and the Council awaits the decision of the First Tier Tribunal (Property Chamber) in this matter.
 - viii. Two further penalties have been issued in 2023 and 2024, of £72500 and £77925 for breaches of the Management of Houses in Multiple Occupation (England) Regulations 2007 and breaches of Management of Houses in Multiple Occupation (England) Regulations 2006 (as amended). These matters are ongoing and may yet be successfully appealed.
- 4.47. In accordance with statutory guidance, all income from civil financial penalties issued for offences under the Housing Act 2004 is retained by the Council and used to support the regulation of the private rented sector in Slough.

- 4.48. The housing regulation team are exploring ways to streamline the process of issuing civil financial penalties to ensure that the process is easier for landlords and officers to understand.
- 4.49. Since April 2019 the Council has successfully prosecuted individuals and a Company for offences under the Housing Act 2004, It is important to note that fines issued on conviction in the Magistrates Court are paid to the Treasury and not to the Council.
- i. In 2021, following a significant fire at 345 Uxbridge Road, Magistrates ordered Nadeem Khan of Warwick Avenue to pay £3990 for operating an HMO without a licence and for breaches of HMO management regulations. The landlord later handed over management and control of the property to a reputable agent and the property has been renovated and is now licensed.
 - i. In January 2022 Mr Faheed Alam Choudhry was convicted of 11 offences under the Housing Act 2004 including operating an HMO without a licence and 10 breaches of HMO management regulations. He was fined £55k by the Magistrates Court, and with costs the total amount Mr Choudhry was ordered to pay was £57,577.92. The landlord has been refused a licence and has appointed a reputable agent to manage the property on his behalf.
 - ii. In September 2022 Mrs Lateef Bibi was prosecuted for operating a HMO required to be licensed, without a licence in Richmond Crescent, and breaching of the Management of Houses in Multiple Occupation (England) Regulations 2006 (as amended). Mrs Bibi was ordered to pay £14,500 fine, £190 victim surcharge and costs of £2,950. Total payment 17,640.
 - iii. In July 2023 London Land Holdings Limited, London Land Holdings 1 Limited and the sole Director of both companies, Susannah Meisner were prosecuted for operating properties in Greenwatt Way, Chalvey, required to be licensed under Selective Licensing, without a licence; and breaching an Abatement Notice issued under section 79a of the Environmental Protection Act 1990. With fines, costs and a victim surcharge the total penalty for the offences was £17,624.75.
- 4.50. The Complex criminal investigations that preceded the criminal and civil sanctions are highly resource intensive and time consuming. It is appropriate therefore that such sanctions are reserved for the most serious and persistent offenders. The Council follows all statutory guidance and codes of practice, as well as its own local enforcement policy in determining whether to prosecute or penalise cases.
- 4.51. The cases listed represent a fraction of the number of investigations undertaken, many of which result in positive outcomes for tenants and residents, without the need for criminal or civil sanctions. These positive outcomes have been extremely difficult to record and measure with the legacy case management system, and the Council is some way away from being able to effectively measure them with the new case management system, which requires extensive development and configuration.

4.52. **Other Outcomes**

4.53. Licensing has driven several wider improvements that are helping the housing regulation team to be more effective. In 2022 the Council approved a new Housing Regulation Enforcement Policy, a Licensing Decisions Policy and Civil Financial Penalty Protocol. These policies provide a framework for officers to make lawful and proportionate decisions and reduce the risk of successful legal challenges.

4.54. The Licensing Decisions Policy now reflects the precedent set by the *London Borough of Waltham Forest v Khan* [2017] UKUT 153 (LC), facilitating an improved and more consistent approach with planning enforcement, for dealing with properties that don't have the planning permission. Joint investigations and information sharing between housing regulation and planning enforcement are a consistent feature of the work of housing regulation.

4.55. Prior to Licensing there was no relationship between Slough Children's Trust Commissioning and housing regulation. This relationship is now developing with a view to better regulating supported living or 'exempt accommodation' and a further additional licensing designation could prove an important tool in achieving this.

4.56. **Case Studies**

4.57. The housing regulation team has used HMO and selective licensing to tackle nuisance and anti-social behaviour resulting from poor and negligent property management.

- In 2019 in Chalvey, a small HMO eligible to be licensed under the additional licensing scheme was reported to the housing regulation team due to complaints about noise, ASB and criminal activity. An intervention by housing regulation and subsequent involvement of third sector partners resulted in the identification of a victim of modern slavery, who was supported to find alternative accommodation. The main perpetrator of the ASB was evicted and the property, which had been poorly managed for some time was sold.
- In 2019 in Baylis and Stoke serious criminal activity was uncovered through the execution of a warrant of entry obtained from the Court on the basis that property in question was suspected to be an HMO requiring a licence. Arrests were made and the property was subsequently subjected to a Closure Order under ASB Crime and Policing Act 2014. The property has now been refurbished and is let as a family home.
- In January 2020, the housing regulation team utilised powers of entry under the Housing Act 2004 to gain access to several unlicensed properties. Intelligence suggested that the occupants of the properties may have been involved in criminal activity including exploitation and modern slavery. Thames Valley Police and other services were able to accompany

the housing regulation team when warrants of entry were executed, allowing them to investigate the intelligence further.

- In 2021 a licence holder of an HMO in Langley was warned that his licence would be revoked due to persistent ASB, and criminal activity associated with the property. The licence holder was also advised that he would not be issued with a further licence and that the property was at risk of being placed under an interim management order. An Interim Management Order involves the Council taking over control of the property and tenancies. In response, the landlord voluntarily surrendered his licence, and the property is now fully controlled by another licence holder who was deemed fit and proper to hold a licence. There has been no recurrence of the ASB since the new licence was issued.
- In 2022 a family property, licensed under the Selective schemes was the subject of persistent noise nuisance complaints. The noise did not constitute a statutory nuisance and was not considered ASB so conventional tools were ineffective at resolving the complaint. In accordance with the ASB Crime and Policing Act 2014 the matter became the subject of 'Community Trigger'. However, an investigation by housing regulation identified that the property was occupied by more than the maximum permitted number allowed by the licence, causing excessive noise. Housing regulation intervened, warning the managing agent that they were breaching legal requirements. Subsequently, the managing agent took action to reduce the number of occupants, therefore resolving the noise complaint.
- A group of licensable properties in Chalvey, owned by the same landlord were falling into disrepair and becoming a source of ASB and criminal activity. Tenants were complaining that they were unable to reach the landlords, who were based in London and that they only visited to collect the rent. The housing regulation team investigated and despite attempts to engage the landlords, the properties remained unlicensed. The Council eventually prosecuted the landlord, prompting them to apply for licences. The proposed licence holder was warned that they would not be considered 'fit and proper' to manage the properties and they appointed a reputable managing agent. The accumulations of waste were removed, and the property deficiencies were addressed.