

Private Rented Sector Property Licensing Proposals

Engagement and Consultation Plan

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1. Introduction

1.1 What is the purpose of this engagement?

There are two parts to the engagement.

The first is to ask for details of any experiences regarding the condition of the private rented sector in Southwark and its effect on deprivation, crime and antisocial behaviour.

The second is to provide stakeholders such as landlords, managing agents and tenants, neighbouring local authorities and the general public with the opportunity to provide their opinions on the Council's draft proposals to renew the additional licensing scheme, and to renew and extend the selective licensing scheme.

The result of this consultation, together with evidence obtained from various other sources will help the council devise a final set of proposals for licensing from 2021-2026 and ensure any proposals meet the needs of, and address appropriate issues, in the borough and the private rented sector.

1.2 What do we want to achieve?

The proposals for the schemes can be found in Appendix 1; however, the overall aim of licensing is to help us to work with landlords to drive up the conditions and management standards of the private rented sector by:

- Facilitating the identification of all privately rented properties within the borough
- Establishing a more complete register of landlords operating in Southwark
- Enabling us to provide an improved strategic approach to managing the sector by redefining how the service operates by shifting the emphasis from a reactive to a proactive service
- Giving us the opportunity to inspect licensable properties to assess living conditions and to ensure that conditions of the licence are being adhered to
- Helping us to ensure that a proper standard of management of privately rented property is maintained and that properties do not become overcrowded
- Strengthening enforcement action to tackle rogue landlords in the sector

The specific objectives for the licensing proposals are:

- Reduction in ASB and repeat ASB incidents in PRS properties in the proposed Selective Licensing designation 1 and Mandatory HMO Licensing
- Improve property standards in the borough in the proposed Selective Licensing designations 2, 3 and 4 and in Mandatory and Additional HMO Licensing
- Ensure compliance with licence conditions
- Reduce the factors that contribute to deprivation in the proposed Selective Licensing designation 3

1.3 How do we plan to achieve our objectives?

The council proposes to carry out a 14 week consultation to obtain feedback and views issues connected to the private rented sector and the proposals for discretionary licensing. Following this wide reaching, full consultation the council will analyse all responses to the consultation and develop a final consultation results report and demonstrate how it has responded to the suggestions received. The results of the consultation will help to inform the final proposals for discretionary licensing. This could include a decision not to introduce discretionary licensing schemes, to introduce a variation of the schemes set out in the proposals. These final proposals will be published and formally agreed by the Council.

2. What can be influenced by the public and what is fixed?

Fixed:

- The continuance of a Mandatory Licensing Scheme
- Mandatory licence conditions for both selective and additional schemes

Can be influenced by the public:

- Whether we bring in a new additional licensing scheme
- Where we bring in a new additional licensing scheme
- Whether we introduce a new selective licensing scheme(s)
- Where we introduce new selective licensing scheme(s)
- The fees and discounts applicable to the proposed schemes
- The discretionary licence conditions for the proposed schemes.

3. Engagement and Consultation Plan

3.1 Who are we engaging with?

The following is a list of examples of the stakeholders that the council will consult with and is not limited.

General target group	Examples of Individuals/organisations
Landlords	<ul style="list-style-type: none"> • Landlords operating and/or living in Southwark • Housing Associations/ Other registered social landlords • Neighbouring borough landlords • Londonpropertylicensing.co.uk
Landlord groups	<ul style="list-style-type: none"> • National Landlords association • London Landlord Accreditation Scheme • Residential Landlords Association • Guild of Residential Landlords • BLA (British Landlords Association)
Managing and letting agents	<ul style="list-style-type: none"> • ARLA Propertymark • Managing and letting agents with local branches operating in Southwark
Residents	<ul style="list-style-type: none"> • Tenants who have privately rented within the last 5 years • Residents who have indirect experience of the private rented sector (i.e. neighbours of PRS properties) • Other organisations that represent tenants in the PRS • Southwark business owners • Southwark owner/occupiers

Organisations that represent tenants in the PRS	<ul style="list-style-type: none"> • Representatives of Tenant Management Organisations (TMOs) • Representatives of Tenant and resident Organisations (TROs) • Generation Rent • Renters Rights London • The Tenants Voice
Professional bodies	<ul style="list-style-type: none"> • Chartered Institute of Housing • Chartered Institute of Environmental Health • The Building and Social Housing Foundation • Local Government Association • Local Government Information Unit • IPPR
Universities	<ul style="list-style-type: none"> • London Southbank University • London College of Communication, University of the Arts • LeSoCo • LSE Students' Union • University of the Arts Students' Union • London South Bank Students' Union • University of London Students' Union • National Union of Students
Neighbouring local authorities	<ul style="list-style-type: none"> • Lewisham • Lambeth • Croydon • Bromley • Tower Hamlets • City of London
Charities	<ul style="list-style-type: none"> • Lambeth and Southwark Mind • Shelter • Crisis • St Mungo's • National Housing Federation • Centre point • The Children's Society • Barnardo's • Action For Children • Women's Aid • SOLACE • Refuge • Joseph Rowntree Foundation • Praxis • Healthwatch England • The Tenants Voice • Actionplus Foundation (UK) • Trust for London • Citizens Advice Southwark • City YMCA

Advice groups	<ul style="list-style-type: none"> • Black Elderly Group Southwark • Blackfriars Settlement • Dulwich Helpline • Blackfriars Advice Centre • Citizens Advice Bureau • Southwark Law Centre • Cambridge House Legal Centre • Multi-Lingual Community Rights Shop • Victim Support Southwark • Southwark Mediation Centre • Southwark Disablement Association • Bengali Community Development Project • Aaina Women's Group • Latin American Women's Rights Services • Millwall Community Scheme • Southwark Churches Care • Southwark Legal and Advisory Network • Southwark Pensioners Centre • Southwark Somali Advisory Forum • Generation Rent
Health	<ul style="list-style-type: none"> • NHS School Nursing Service • Mental Health Trust for Southwark • Southwark Hospitals • GPs (websites) • NHS local clinical Commissioning groups • Social Services
Emergency Services	<ul style="list-style-type: none"> • Southwark Safer Neighbourhood Police teams • Modern Slavery Unit Met police • UK Border Agency- ICE • Fire Service- Borough Commander
Other	<ul style="list-style-type: none"> • Southwark Foodbanks • London Credit Unions • Trading Standards • Suppliers of temporary accommodation • Southwark Schools • MPs, Local Cllrs • GLA • Mayor of London

3.2 When and how are we engaging?

When: The consultation period for selective and additional licensing proposals required by MHCLG is 10 weeks. In light of current government advice to address Covid19 constraints during public consultation in order to reach as many consultees as possible, it has been decided that this consultation will be extended to 14 weeks, commencing February 2021 concluding May 2021. The extended consultation timeline has been given to ensure that; adequate time is given during the consultation to ensure that activities are carried out in full compliance with Covid-19 restrictions, and taking into account additional measures to ensure engagement with a wide range of stakeholders to include all groups. To support this and making use of the additional time, a number of different engagement activities have been planned for the licensing proposals.

Online consultation questionnaire

The primary way in which people will be able provide their feedback on the schemes and give details of their experiences will be via the online consultation questionnaire. This is to ensure as much as possible that the responses received are focused on the questions that we need answered and to facilitate the collation, comparison and tracking of responses.

The questionnaire will be relevant for all interested parties as it will ask targeted questions dependant on who you are i.e. whether you are a tenant, landlord or managing agent etc. The questionnaire will be hosted on a dedicated and easily accessible page on the Council's website that will provide the respondent with all the information necessary about the proposal to allow them to make an informed response. The on-line questionnaire will be accessible via all digital platforms – mobile, tablet, laptop/computer. Residents without digital access will be able to request a paper copy or can be supported to complete the questionnaire digitally at one of our engagement sessions or during an appointment with an officer.

Meetings/workshops/forums/engagement sessions

During the course of the consultation we will be running a number of online events to encourage engagement with stakeholders. We will be attending multiple online landlord's forums and homeless forums to inform them about the consultation and engage in Q & A sessions. Attendees will be invited to our online consultation workshops and/or encouraged to fill out our online consultation questionnaire on the tablets we will have available at the sessions.

We will be holding a total of six workshops, three for landlords and agents and three for residents. These workshops will allow each group the opportunity for an in-depth interactive session to discuss their thoughts on our proposals and their experiences regarding the condition of the private rented sector in Southwark and its effect on deprivation, crime and anti-social behaviour.

Face to face with residents

In light of the Covid-19 restrictions face to face activities will be avoided but replaced with direct mailing, posts on social media, identifying PRS hotspots for targeted Street leaflet drops, outdoor banners in outdoor spaces likely to receive high footfall during any lockdown, use of council tax data to target tenants and piggybacking onto planned Council correspondence, residents phone survey.

Housing Solutions run weekly tenancy workshops online to equip those who are actively looking for private rented accommodation with the skills and knowledge to help find a tenancy in the private rented sector. We will be attending a number of these workshops to inform attendees of the consultation and ask for their views and encourage them to participate in the online questionnaire.

In writing/email

Contact details will also be advertised as part of the consultation so that representations can also be made via e-mail or in writing. There will be a dedicated email address for responses.

The consultation will take note of any formal petitions and will also take note of any activity on social media, although this will not equate to a formal representation.

3.3 What are the questions we will ask?

The example questions used here are samples taken from our online consultation questionnaire and should not be considered exhaustive. There will be an extensive evidence pack with all of the background information to allow respondents to understand what they are being asked and give a considered response.

1. Whether the stakeholder has direct experience of antisocial behaviour, deprivation or poor housing conditions in the private rented sector.
2. How has Covid-19 affected them.
3. If they agree with the council's proposal to introduce a renewed additional licensing scheme
4. If they agree with the council's proposal to introduce a renewed and expanded selective licensing scheme
5. Whether they agree with the principles of each schemes and the wards that we have proposed to include
6. If they think the fees and discounts reasonable
7. If they are a landlord, whether they would be interested in signing up to the Gold Standard Charter and whether the proposed discount on licensing fees would be an incentive.
8. If they are a tenant in the private rented sector whether they would be more likely to move into a property with a landlord or managing agent who has signed up to the Gold Standard Charter than one without.
9. If there any criteria for the Gold Standard Charter that you think should NOT be included, and why.
10. If there any criteria for the Gold Standard Charter that you would like to see ADDED, and why.
11. If they are a tenant in the private rented sector whether they would be interested in joining a renter's union.
12. There will be an optional set of questions asking people for information about their age, sexual orientation, ethnicity and age etc. This will help us ensure that we are gathering views from all communities.

3.4 How will we promote the engagement opportunity?

The Council will conduct necessary communications activity to promote the consultation and ensure that a true reflection of the views of the affected groups in relation to this consultation is achieved. The key to successful consultation is to ensure that stakeholders who could be affected are informed and aware of the proposals and understand how they can provide feedback. Communications will take place throughout the duration of the consultation and will include:

- Advertising on electronic media such as The Source, Southwark Council website
- An eform linked to the main consultation webpage
- Advertising on Social media such as Twitter, Instagram, Facebook
- Straplines linked to the main consultation page to be added to all Officer email signatures
- Posters/Advertising on buses and bus shelters
- Direct emailing of landlords and managing/letting agents or properties licensed within the last 5 years
- Online engagement sessions with managing/letting agents.
- Direct mail and email to local communities

- Press releases in local publications such as Southwark Life, South London Press, Peckham Peculiar
- Posters referring people to the consultation.
- Flyers to be sent to addresses that are indicated by Council data as occupied by residents with a profile that matched those in the PRS.
- Flyers to be included in correspondence to tenants and landlords.
- Flyers for students to be distributed at local higher education establishments
- Online community meetings and events in Southwark, including area housing forums, street consultation events and focus groups for the representatives of some minority groups
- Online landlord representative events, including a landlords forum, landlords focus group and Southwark Homeowners Forum for leaseholders
- Publicity on a landlord information website
- Online meetings with representatives of charities such as Shelter, Crisis, St Mungo's etc.
- Emails to a wide range of national, regional and local stakeholders
- Posters/Advertising on In-Block Management Boards
- Posters/Advertising on Resident Association community boards
- A dedicated email address for responses
- Banners for events.
- PowerPoint presentations for events.
- Direct emailing of landlords who are members of the landlord forum
- Direct emailing to Landlord forums or other professional landlord groups.
- Direct emailing of accreditation schemes.
- Direct emailing of Resident Associations, TMOs and TROs.
- Officers interviewing tenants and landlords/managing agents whilst on inspections
- Direct contact with landlords and managing agents and bodies representing landlords and agents
- Invitation of various stakeholders to online workshops
- Presentations at online forums
- Advertised internally on staff intranet
- Direct email to the equivalent team in neighbouring local authorities

3.5 What is our plan for letting people know the outcome of the consultation?

Throughout the consultation process a record of each consultation event or period that has been undertaken and the feedback obtained will be formally logged. The record will detail the date of the consultation, what form of consultation took place, who was consulted and what feedback was given. Once the consultation has concluded and all responses are in, all feedback will be analysed and summarised in the consultation report.

Southwark council are committed to ensuring all comments received are recorded and there is a clear audit trail of all decisions made and how consultation responses were taken into consideration and balanced with any evidence and specific information gathered. The consultation report will be published and placed on the website. The outcomes of the consultation and response to the consultation, plus any recommendations for a selective and additional licencing scheme will be made to the Council's Cabinet. The response to the Consultation and what actions and/or changes have been made to the scheme as a result will form part of the submission to government.

3.6 What is our plan for mitigating the challenges of consulting during Covid19 restrictions?

In light of current government guidelines on carrying out public consultation under Covid19 restrictions, Southwark Council will extend the consultation by 4 weeks to allow sufficient time for wide reaching engagement. Southwark will replace traditional face to face engagement with digital, paper and other remote alternatives. Below are some examples of these and further detail can be found in the activity plan in the next section.

- Gaining views by proxy through community groups and charities
- Use of online and paper surveys

- Use of specifically targeted community outdoor campaigns to reach digitally excluded groups as well as wider affected stakeholders (e.g. in parks, schools, sides of buses and near supermarkets, pharmacies)
- Online forums for key affected stakeholders e.g. landlords, businesses, and tenants
- Targeted paper and e-leafletting campaign
- Direct email/telephone campaign to affected stakeholder groups
- Targeted digital marketing to affected audiences who cannot be reached physically due to Covid-19
- Regular monitoring of incoming results enabling us to adapt our approach at pace to ensure that reasonable efforts are made to engage with all groups including hard to reach, shielding, older and digitally excluded
- Working with local groups and charities to ensure that the consultation communications are distributed to the appropriate communities.

4. Activity plan

NO.	WHAT	WHO	PURPOSE	WHERE	WHEN
	Landlords Forum	80+	Introduce the plan to hold a consultation and ask for volunteers to attend our licensing consultation workshops	Online	2021 TBC
	Homeless forum	40+	Introduce the plan to hold a consultation and ask for volunteers to attend our licensing consultation workshops	Online	TBC
	Landlords Workshop	10+	Discussion workshop to understand private sector landlords' opinions on the proposals with brief Q&A session.	Online	February/March/April
	Tenants Workshop	10+	Discussion workshop to understand private sector tenants' opinions on the proposals with brief Q&A session.	Online	February/March/April
	Landlords Workshop	10+	Discussion workshop to understand private sector landlords' opinions on the proposals with brief Q&A session.	Online	February/March/April
	Tenants Workshop	10+	Discussion workshop to establish private sector tenants' opinions on the proposals with brief Q&A session.	Online	February/March/April
	Landlords Workshop	10+	Discussion workshop to establish private sector landlords' opinions on the proposals with brief Q&A session.	Online	February/March/April
	Tenants Workshop	10+	Discussion workshop to establish private sector tenants' opinions on the proposals with brief Q&A session.	Online	February/March/April
	Attend Community Council Meetings		Introduce the plan to hold a consultation and ask for volunteers to attend our licensing consultation workshops	Online	TBC
	News Story for press	General public	Fly on wall bad landlord case study with lead into licensing consultation	EHN, Southwark Life, South London Press, Southwark News, Peckham Peculiar, Lambeth & Southwark News	First week of consultation
	Adverts in press	General public	Advertise licensing consultation	EHN, Southwark Life, South London Press, Southwark News, Peckham Peculiar, Lambeth & Southwark News	Week one of consultation and week 6 of consultation
	Landlords Bulletin	300+	Advertise licensing consultation	Mail list	February

London Landlord accreditation scheme newsletter	All member of the LLAS	Advertise licensing consultation	Members list	TBC
Strap lines on emails	General public	Advertise licensing consultation	Housing enforcement (19 officers) Housing Options/tenancy relations teams	Duration of consultation
Social media campaign	General public	Advertise licensing consultation	Facebook, Twitter, Instagram, Yammer	Once a week for the duration of consultation
Advertising on electronic media	General public	Advertise licensing consultation	The Source, Southwark Council website	Duration of consultation
Southwark Life Housing e-news newsletter	Mailing list	Advertise licensing consultation	TBC	
Email/Mail shot to stakeholders	Mailing list	Advertise licensing consultation	TBC	March
Email invitations	Mailing list	Invite landlords, tenants and agents to our discussion workshops on our licensing proposals	Email	February
Posters	General public	Advertise licensing consultation	To be displayed in public places most frequented under current Covid-19 restrictions e.g. parks, lampposts	Duration of consultation
Adshels	General public	Advertise licensing consultation	Roadside in high traffic areas, bus stops and busy pedestrian areas	Duration of consultation
Digital marketing boards	General public	Advertise licensing consultation	Busy pedestrian areas	Duration of consultation
Banners	General public	Advertise licensing consultation	Railings outside public owned buildings and outdoor spaces e.g. parks	Duration of consultation
Flyers	General public	Advertise licensing consultation	Posted in targeted areas	Duration of consultation
Information bulletin	General public	To advertise the consultation and offer the public the chance to approach us informally and ask questions they have regarding the scheme.	TBC	Multiple events throughout the consultation

5. Contact information

Stakeholders are able to contact officers if they would like to know more about the engagement plan or activities at resi@southwark.gov.uk

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