

Tackling and disrupting serious and organised crime based in private rented sector properties

Report for Leeds City Council

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Please note that the views expressed in this report are those of the authors alone and do not necessarily reflect the positions of the Council, the Project Team or the Ministry of Housing, Communities and Local Government (MHCLG).

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Executive Summary

This report explores the relationship between properties in the Private Rented Sector (PRS) in England and criminality, including serious or organised crime. It examines the extent to which landlords or lettings agents may be directly engaged in criminal activity or inadvertently facilitate such practices through inadequate property management. The research aims to enhance understanding of these issues and explore the barriers that local authorities face in tackling them, with the aim of highlighting best practices, and developing evidence-based policy recommendations to improve regulatory frameworks and ensure safer residential environments.

The findings highlight the need to raise awareness of the critical role local authorities play in addressing criminality within the PRS and to encourage stronger collaboration with other local authorities and partner enforcement agencies. To achieve this, a more robust legislative and regulatory framework is required – one that enhances investigatory powers and facilitates the prosecution of criminal landlords. The report underscores the importance of establishing a comprehensive intelligence sharing infrastructure, including a centralised landlord and property registration system, improved access to law enforcement databases, and strengthened data-sharing agreements between relevant agencies.

Many local authorities currently operate in a largely reactive capacity, addressing housing-related breaches as they arise. Shifting towards a more proactive approach in identifying and tackling wider criminality within the PRS will require, for some, a fundamental change in mindset and operational strategy. For those who regularly visit properties, targeted training will be essential to help identify potential ‘red flags’ of criminal activity. This will equip local authority staff and other enforcement officers with the necessary skills to detect and respond effectively to illegal practices within the PRS.

By adopting the recommendations set out in this report, policymakers can implement a more strategic, coordinated, and evidence-based approach to tackling criminality within the PRS. This will contribute to improved housing standards, more effective enforcement mechanisms, and the creation of safer, more resilient communities.

Section 1. Introduction

1.1 Perpetuity Research were commissioned by Leeds City Council to undertake an important new research project aimed at investigating how residential properties in the Private Rented Sector (PRS) may be used to facilitate criminal activities, including organised crime. This research is part of the government's PRS Pathfinder programme and is designed to address critical challenges in the housing and security landscape. This project was carried out between July 2024 and March 2025.

Aims

1.2 The main aims of the research were:

- a) To better understand the links between landlord criminality and serious or organised crime, exploring how some landlords may be directly involved in such criminal activities or inadvertently allow their properties to be used for such purposes.
- b) To identify and share best practices in managing PRS properties and reducing the risk of criminal activity to help create safer residential environments.
- c) To enhance collaboration between housing enforcement agencies and other stakeholders, fostering a united approach to tackling crime within the PRS.
- d) To develop an online toolkit to assist stakeholders within the PRS in preventing and reducing property-related crime.
- e) To provide policy recommendations to the government to help shape strategies for tackling criminality within the PRS, contributing to improved housing stock and safer communities.

1.3 The aims were achieved by:

- a) Undertaking a brief literature review of relevant materials, including previous and up-to-date research and policy framework documentation relating to criminality in the PRS, especially that associated with organised crime.
- b) Conducting an in-depth evaluation of Leeds City Council's approach via their Criminal Landlord Unit (CLU) to tackling criminality in their PRS, assessing effectiveness through data review, partner insights, and gap analysis.
- c) Consulting more widely with local housing authorities to assess their experience of criminality in the PRS and their response to it. In addition, gathering insights from government officials, and other key stakeholders, including a survey of the Local Government Association's (LGAs) Community Advisory Safety Network officers.

1.4 Details of our Methodology can be found at Appendix A.

The Problem

- 1.5 The PRS is the backbone of housing for millions across England, yet beneath the surface, a dangerous undercurrent of criminality threatens tenants, communities, and the integrity of the housing market itself. While most landlords operate lawfully, a growing number exploit the system – some knowingly, others by turning a blind eye through negligence, allowing properties to become hubs for organised crime. From human trafficking and drug production to fraud and money laundering, criminal landlords enable and profit from illegal activities, often at the expense of the most vulnerable tenants. The true scale of this issue remains hidden, shielded by weak enforcement, fragmented oversight, and a lack of coordinated action between local housing authorities and other stakeholders.
- 1.6 The consequences can be devastating. Criminals and organised crime groups operating in the PRS bring violence, exploitation, and instability into neighbourhoods, turning homes into hubs of illicit activity. Tenants often feel powerless to report suspicious behaviour for fear of eviction or retaliation. The result is not only declining property standards but also rising crime and a breakdown in trust within communities. Without action, the PRS risks becoming a convenient tool for embedding criminality into everyday life.
- 1.7 There is a growing concern about the lack of both understanding and research into how the private PRS may be misused to support criminal activity and its links to organised crime. As the sector has grown, particularly in some cities, oversight and regulation have often lagged behind, creating conditions where illegal practices can easily go unnoticed. Individuals or criminal groups can take advantage of poorly monitored or loosely managed properties to facilitate illegal activities. While some academic work has begun to highlight these risks, the PRS is still largely under-explored in this context. Greater awareness, supported by more focused research, is needed to fully understand how the sector can be exploited and to develop more effective strategies to address these vulnerabilities.

Section 2. Literature Review

Introduction

2.1 The PRS has long been recognised as an area vulnerable to criminal exploitation. Over the past decade, scholarly and policy-based literature has examined various regulatory frameworks, enforcement challenges, and the intersection of landlord misconduct with serious criminal activities. This literature review charts the development of interest in identifying and addressing criminality within the PRS, with a particular focus on the role of landlords in facilitating or engaging in illicit activities.

Early policy initiatives and recognition of the issue

2.2 In 2012, the Department for Communities and Local Government¹ issued *Dealing with Rogue Landlords: A Guide for Local Authorities*,² marking an early policy effort to address exploitative landlord practices. The document acknowledged the link between rogue landlords and serious organised crime, urging local authorities to leverage enforcement tools to combat these practices. It highlighted issues such as unsafe accommodations, overcrowding, and the exploitation of vulnerable tenants. However, this guidance was withdrawn in 2015 and replaced by *Improving the Private Rented Sector and Tackling Bad Practice: A Guide for Local Authorities*, which refined legal strategies to address these issues.

2.3 A few years later, Jackson (2017)³ examined the effectiveness of criminalising rogue landlords in England and Wales, concluding that enforcement remains a major challenge. Despite the introduction of legal measures aimed at prosecuting exploitative landlords, many evade justice due to regulatory loopholes and inadequate local authority resources for enforcement. Jackson also highlighted tenants' reluctance to report abuses due to fear of retaliatory eviction, further weakening the effectiveness of criminalisation efforts.

The shadow of the PRS and its links to serious and organised crime

2.4 Rugg et al. (2020)⁴ provide one of the most comprehensive examinations of criminality in what they term '*the shadow PRS*', a loosely regulated and often illegal subset of the rental market where criminality is

¹ Replaced by The Ministry of Housing, Communities and Local Government in 2024.

² <https://assets.publishing.service.gov.uk/media/5a78e907e5274a2acd18abc8/2206919.pdf> withdrawn on 17 March 2015 and replaced by Improving the private rented sector and tackling bad practice: a guide for local authorities.

³ Jackson, A. (2017). Regulating Rachmanism? The criminalisation of landlords in England and Wales. *Regulating the city: contemporary urban housing law, studies in housing law*. Eleven International Publishing, Den Haag, 145-170.

⁴ Rugg, J. J., Spencer, R., Barata, E., & Reeve-Lewis, B. (2020). Journeys in the Shadow PRS. York: White Rose University Press (WRUP).

pervasive. Their study reveals how some landlords, either directly or indirectly, engage in organised crime by exploiting tenant vulnerabilities, manipulating housing benefit systems, and providing accommodation to those engaged in illicit activities, including serious and organised crime. They identify a range of unlawful practices, from illegal evictions and rent extortion to links with human trafficking and drug cultivation, all enabled by a lack of oversight and enforcement.

2.5 The findings of Rugg et al. align with those of Skidmore et al. (2020),⁵ who argue that organised crime infiltrates multiple sectors at the community level, including housing. While Skidmore et al. do not focus exclusively on the PRS, their research emphasises the need for integrated data analysis to uncover hidden criminal networks. Similarly, Kupka, Walach, and Brendzová (2021)⁶ provide an international perspective, examining the poverty business in Czechia's disadvantaged neighbourhoods. They highlight how landlords exploit social benefit-dependent tenants, charging excessive rents for substandard housing – a pattern mirroring exploitative trends in England and Wales. These studies collectively underscore the need for a more cohesive regulatory framework to combat landlord-driven criminality.

Variability in local enforcement and legislative responses

2.6 Simcock and Mykkanen (2018)⁷ reveal significant disparities in local authority enforcement of PRS regulations. Their study found that during the financial year 2017/18, 18% of local authorities had not issued a single Improvement Notice,⁸ while 67% had not prosecuted any landlords, despite a sharp increase in reported violations. Additionally, 89% of councils had not utilised new Civil Penalty⁹ powers, highlighting a systemic failure to apply existing enforcement tools. The postcode lottery of regulatory action suggests that tenant protections and criminal deterrence remain inconsistent across different regions and from one local authority to another.

2.7 In 2022, as part of a much wider implementation of reforms in the PRS, the Department for Levelling Up, Housing and Communities sought to address these enforcement challenges with *A Fairer Private Rented*

⁵ Skidmore, M., Crocker, R., Webb, S., Gill, M., Garner, S., & Graham, J. (2020). Peeling back the layers of organised crime in local communities: Integrating data and analyses to strengthen the narrative. *Crime Prevention and Community Safety*, 22, 191-209.

⁶ Kupka, P., Walach, V., & Brendzová, A. (2021). The poverty business: Landlords, illicit practices and reproduction of disadvantaged neighbourhoods in Czechia. *Trends in Organized Crime*, 24, 227-245.

⁷ Simcock, T., & Mykkanen, N. (2018). The Postcode Lottery of Local Authority Enforcement in the PRS. Manchester: Residential Landlords Association.

⁸ An improvement notice is a notice issued by local authorities requiring landlords to carry out repairs or improvements to meet health and safety standards.

⁹ A civil penalty is a financial penalty imposed by a government agency or council as a restitution for wrongdoing. It is often used as an alternative to criminal prosecution and is designed to encourage compliance without the need for a court case.

Sector.¹⁰ The White Paper proposed mandatory inclusion of all eligible offences in the Database of Rogue Landlords and Property Agents, strengthening banning orders to prevent convicted landlords from re-entering the market. While not explicitly focused on organised crime, these measures aimed to tackle fraudulent and illegal landlord activities, including unlawful evictions and unsafe housing conditions.

2.8 Stewart and Lynch (2022)¹¹ examine the evolving regulatory framework, emphasising the shift towards stricter interventionist policies to address PRS criminality. Meanwhile, Stewart and Moffatt (2022)¹² highlight how austerity-driven reductions in Environmental Health Officers (EHOs) and frontline regulators have exacerbated enforcement challenges, creating an environment where rogue landlords can operate with relative impunity. Amodu (2023)¹³ critiques existing legal frameworks, arguing that they focus too heavily on property conditions rather than addressing the power imbalances between landlords and tenants that enable exploitation and criminal behaviour.

Shifting enforcement approaches and ongoing research

2.9 Cowan and Marsh (2024)¹⁴ identify a shift in local authority enforcement strategies, moving from collaborative compliance to hardline enforcement. Historically, regulatory agencies sought to encourage voluntary landlord compliance with housing standards, through providing guidance, informal warnings, and opportunities to rectify issues maintaining housing standards. However, persistent issues have necessitated more assertive legal actions, such as licensing schemes, fines, civil penalties, and prosecutions. While financial and resource constraints remain, this transition signals a growing recognition that voluntary compliance is insufficient to tackle systemic issues within the PRS.

Conclusion

2.10 The majority of literature on criminality within the PRS has tended to focus on housing breaches and poor standards of accommodation. Where criminality has been it has illustrated how the PRS serves as a fertile ground for illegal activity, facilitated by regulatory blind spots and

¹⁰ Department for Levelling Up, Housing and Communities A Fairer Private Rented Sector CP 693 (June 2022)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1083381/A_fairer_private_rented_sector_print.pdf

¹¹ Stewart, J. and Lynch, Z. (2022). Perspectives in the regulatory framework and intervention. In: Stewart, J. and Lynch, Z. (eds.) *Regulating the Privately Rented Housing Sector: Evidence into Practice*. Bristol: Policy Press,

¹² Stewart, J. and Moffatt, R. (2022). Regulating the privately rented sector: what should the workforce look like? In: Stewart, J. and Lynch, Z. (eds.) *Regulating the Privately Rented Housing Sector: Evidence into Practice*. Bristol: Policy Press

¹³ Amodu, T. (2023). Opening Pandora's box? Capturing the edifice of 'hopefulness' in the private rented sector. *Legal Studies*, 1-18.

¹⁴ Cowan, D., & Marsh, A. (2024). Local authority intervention in private renting: From compliance to hardline enforcement. *Journal of Law and Society*.

tenant vulnerability. While early policy efforts recognised the link between landlord misconduct and criminal activities, enforcement challenges – exacerbated by resource constraints and inconsistent regulatory application – have allowed exploitative practices to persist. Recent policy initiatives and legislative developments signal a shift towards stricter oversight, greater transparency, and more punitive measures. However, enhanced cross-agency collaboration and ongoing research¹⁵ will be critical in developing more effective strategies to combat criminality within the PRS, and more focused research to highlight the issues.

¹⁵ As well as their own research, the authors recognise the on-going research into understanding criminality in the PRS being undertaken by the University of York and the University of Sheffield

Section 3. Findings

Introduction

3.1 This section examines the responses of those consulted, either through interviews or through the survey, regarding their experiences of criminality within the PRS and how they responded to it. The findings are presented under the following headings:

- Criminality experienced in the PRS
- Response by local authorities and other agencies
- Barriers encountered when trying to tackle criminality in PRS
- Suggestions from improvements

Research on tenants is out of scope for this project.

Criminality experienced in the PRS

3.2 This section explores what those consulted with said about the nature of criminality found in their PRS, including the individuals and groups involved in these illegal activities (tenants are out of scope for this project), as well as the types of crimes identified and what local authorities and other related partners are seeing as current trends.

The offenders

3.3 By examining the roles and motivations of those involved in criminality in the PRS, a clearer understanding can be gained of the scope of criminality within the PRS. From the consultations undertaken with local authorities and others dealing with criminality in the PRS, offenders could generally be split into two main groups – criminal landlords and organised crime groups, with criminal landlords involved not only in housing-related offences, but also in more traditionally regarded crimes.

3.4 As outlined in the earlier literature review, the behaviour of criminal landlords (often, and sometimes unhelpfully, referred to as 'rogue landlords') has been recognised as a significant issue for well over a decade. While initial concerns primarily focused on housing regulation breaches, recognition and attention has since expanded to include their involvement in wider criminal activities (including organised crime) linked to their rental properties.

3.5 Rugg et al. identified five types or 'shades' of criminal landlord behaviours ranging from conscious negligence to those involved in more serious and organised criminal activities. Although, as the authors point out, there is some overlap in categories, they include those who are wilfully ignorant, corner cutters, scammers, prolific offenders and those letting linked to organised crime.

3.6 Those consulted who shared their experiences of criminal landlords in their areas, referred to all types – ranging from those committing

housing-related offences out of ignorance or negligence to more prolific offenders, including those linked to organised crime. These cases involved not only individual landlords but also corporate entities, including letting and managing agents. For some of these landlords, criminal activity within their rented properties was an integral part of their 'business model' serving either to generate personal profit or to support a broader criminal network connected to organised crime.

- 3.7 The UK government defines organised crime as 'serious crime planned, coordinated, and conducted by people working together on a continuing basis', which often involves violence, corruption, or fraud for financial gain.¹⁶ Section 45 of The Serious Crime Act 2015 reinforces that organised crime includes activities involving financial gain through illegal housing practices, making landlords, letting agents, or networks knowingly engaging in these acts liable for prosecution.
- 3.8 Organised Crime Groups (OCGs) have become a significant concern within the UK's PRS. These networks are often found engaging in money laundering,¹⁷ fraud, and exploitation, utilising housing as a vehicle to conceal their illegal activities. A striking statistic reveals that about 41% of criminal networks use property as an asset to launder money.¹⁸
- 3.9 Accounts from local authority officers and other consultees revealed frequent encounters with criminal activity linked to OCGs, which were engaged in a range of illegal enterprises. Many of these activities relied heavily on PRS properties as either bases of operation or as accommodation for trafficked or exploited individuals. Unlike isolated criminal acts, organised crime was described as systematic and meticulously planned, often involving multiple individuals with distinct roles – ranging from recruiters and enforcers to money launderers and exploiters.
- 3.10 Evidence indicated that some members of OCGs became landlords as part of their operations. In other cases, existing PRS landlords and letting agents were either recruited, coerced, or willingly involved in facilitating criminal activities. In fact, there were accounts of landlords, letting agents, and other service providers establishing businesses solely to serve the interests of OCGs. At the other end of the spectrum, some landlords were entirely unaware of the criminal activity taking place within their properties, while others were complicit – either through direct involvement or by turning a blind eye.
- 3.11 Importantly, those who had encountered organised crime in their PRS properties found that not everyone involved in these situations was a perpetrator. In many instances, individuals who appeared to be connected to organised crime were, in fact, victims – trafficked, exploited, and forced into labour or sex work. There were also cases where vulnerable tenants were coerced into subletting their properties

¹⁶ <https://www.gov.uk/government/publications/serious-and-organised-crime-strategy-2023-to-2028>

¹⁷ [Two-fifths of organised crime networks launder money through property | The Law Society](https://www.lawsociety.org.uk/-/media/assets/property/tax-and-property/tax-and-property-practice-area/organised-crime-and-money-laundering/two-fifths-of-organised-crime-networks-launder-money-through-property.ashx)

¹⁸ <https://moneylowdown.com/money/organized-crime-is-laundering-money-through-european-real-estate/>

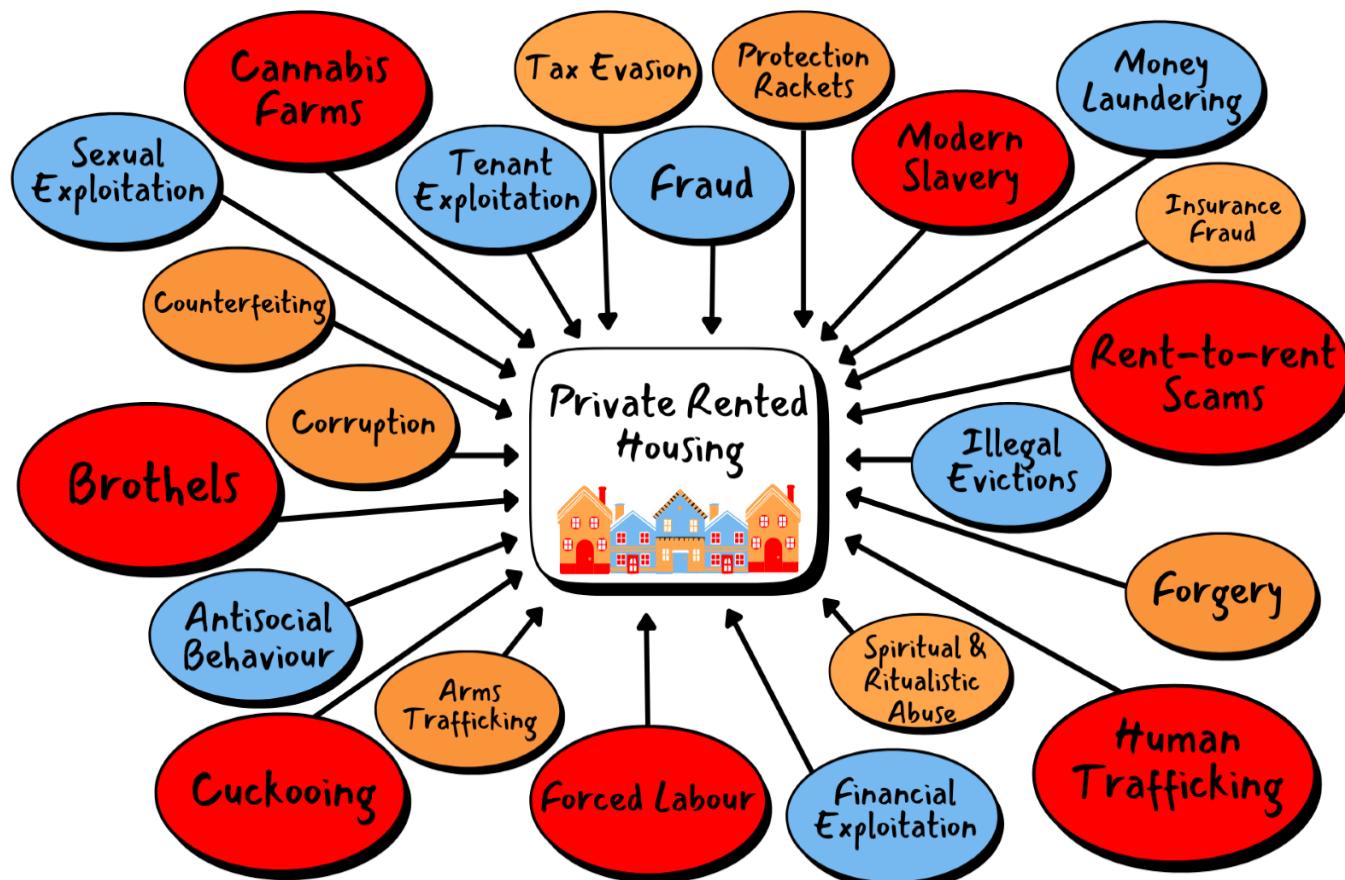
for criminal activities or were 'cuckooed' in their own homes. Officers often reported difficulty in determining whether those found in the properties were victims or perpetrators. This uncertainty was compounded by the reluctance of some individuals to speak with authorities, making it challenging to discern their true circumstances.

3.12 Because OCGs operate across multiple locations, those consulted with said that criminal activity identified in one property is rarely an isolated issue. It is often linked to wider networks spanning neighbouring local authorities, national jurisdictions, and even on occasions international borders. Those who had dealt with such activities stressed the importance of collaboration with others, including the police, Home Office Immigration Enforcement, modern slavery organisations and Trading Standards. They stressed the importance of recognising the patterns and warning signs of organised crime and tried to ensure the correct response, including safeguarding potential victims, to effectively disrupt such criminal operations.

Crime types associated with PRS properties

3.13 This section outlines the types of crime identified within the PRS, drawing on insights from consultations with various stakeholders. The findings reveal a wide spectrum of criminal activities, ranging from opportunistic offences to planned and sophisticated organised crimes involving OCGs. The accompanying 'crime map' (Figure 1) illustrates a visual overview of the key crime types impacting the sector. A comprehensive list of offences reported by those consulted can be found in Appendix C.

Figure 1 – Crime types associated with PRS properties



Current Trends

3.14 This section outlines what those tasked with identifying and investigating criminality in the PRS highlighted as recent trends observed in their PRS properties. A number of issues were identified but four main areas were of particular concern to those consulted with:

- 3.15 Increase in organised crime
- 3.16 Prevalence of rent-to-rent scams
- 3.17 Abuse of vulnerable tenants
- 3.18 Increased use of Airbnb-style accommodation

Increased prevalence of organised crime

3.19 One of the key themes was that organised crime within the PRS is no longer confined to London or major metropolitan areas. Criminal networks are increasingly shifting their operations into the counties, regional towns, and even more rural areas. As one survey respondent noted: 'This is moving out of London into the counties at a fast rate. The counties need to understand the impact that this will have on them.'

3.20 In terms of the types of activities being observed, officers noted that the nature of organised crime tends to align with the demographic backgrounds of those involved. Different ethnic and national groups often engage in distinct types of illicit activities. For instance, they said that Vietnamese criminal groups are frequently associated with nail bars, while Eastern European networks dominate hand car washes, some of which double as fronts for exploitation and modern slavery. Reports indicate that some car washes are also linked to brothels, with workers also acting as security, highlighting the layered criminality embedded within these businesses.

3.21 Officers also noted that, rather than operating in isolation, OCGs tend to collaborate and form interdependent networks. These partnerships often have direct links to various forms of exploitation, including labour abuse and modern slavery. In many cases, individuals trafficked into the UK under false job advertisements – an increasing issue noted by interviewees – find themselves trapped in exploitative conditions, working for little to no pay. This complex web of criminality makes it difficult to dismantle these networks, and officers found that shutting down one operation often reveals ties to multiple other illicit activities, sometimes in other local authority jurisdictions.

3.22 Comments were also received that some OCG operations exploit the intersection between PRS housing and commercial properties. It was not uncommon to find organised crime operating within accommodation situated above commercial establishments such as convenience stores, barbers, and vape shops. These properties are often overcrowded and used for illicit activities, including illegal tobacco sales and sexual exploitation.

3.23 Finally, some interviewees commented that they were increasingly seeing OCGs using PRS properties as a means of laundering illicit funds. They had observed landlords, particularly those with large property portfolios, insisting on cash payments for rent, raising suspicions of money laundering.

Rent-to-Rent Scams

3.24 Officers from different local authority areas, particularly in the south-east, reported growing concerns over rent-to-rent scams, where an intermediary takes over properties from landlords and then illegally sublets them, often overcrowding to maximise profit. Interviewees noted that these setups frequently result in tenants being unknowingly placed in unlicensed Houses in Multiple Occupation (HMOs) and find themselves facing potential eviction. One officer highlighted that in their area alone, nine such cases were uncovered in a single week, illustrating the scale of the issue.

3.25 A key challenge raised was the ease with which these scams operate. Anyone can set up as a property manager, and once authorities begin enforcement action, the companies behind these scams often dissolve, reappearing under new names or with different aliases. Interviewees described a constantly evolving map of shell companies, making it difficult to track down those responsible, especially as some individuals behind these operations use false identities or relocate abroad. While the extent of links to wider criminal activity remains unclear, the transient and opaque nature of these setups raises significant enforcement challenges. Some landlords and intermediaries also claim ignorance of the overcrowding, adding another layer of complexity for local authorities trying to tackle the problem.

Abuse of vulnerable tenants

3.26 Officers from different local authority areas reported a growing trend of increasing exploitation of vulnerable tenants. A key concern raised was the rise of cuckooing, where criminals take over the homes of vulnerable individuals to use as bases for illegal activities such as drug dealing and human trafficking. Several interviewees noted a noticeable increase in these cases, often involving tenants already facing significant issues, including mental health challenges, substance abuse, or financial hardship. Some of these cases were linked to landlords already of concern, with particular hotspots emerging in certain areas.

3.27 Interviewees highlighted that organised crime groups are increasingly using cuckooing to extend their operations while evading police detection, taking advantage of tenants who are less able to resist or report exploitation. The challenge, they explained, is that these situations often involve tenants who also have complex needs or criminal associations, making enforcement and intervention even more difficult. This cycle of exploitation and instability is becoming a growing concern, requiring a more coordinated response from local authorities and enforcement agencies.

Use of Airbnb-style properties

- 3.28 Officers from different local authority areas reported a growing concern over the exploitation of Airbnb-style properties for criminality, particularly by organised crime groups. Interviewees noted that the short-term nature of these rentals, combined with the sector's relatively low levels of regulation and oversight, makes them attractive for illicit activities. Unlike traditional rented properties, where enforcement teams and local authorities have more oversight, these short-term lets allow criminal activity to go undetected.
- 3.29 Some interviewees also highlighted that landlords are falsely claiming their properties are short-term Airbnb lets when, in reality, they are being used as HMOs. By doing so, landlords can evade regulations designed to protect tenants, bypass licensing requirements, overcrowd properties, and avoid providing proper tenancy rights.

Response to criminality in the PRS by local authorities

- 3.30 Through interviews with local authority personnel, who provided practical insights into their real-world responsibilities and approaches to housing enforcement, a broad spectrum of enforcement actions was identified. These findings informed the development of the model presented in Figure 2.
- 3.31 This model categorises the levels of enforcement undertaken by local authority housing teams into four key areas, integrating both reactive and proactive approaches to address housing breaches and criminality within the PRS.
- 3.32 The model captures the full scope of enforcement actions used to improve housing conditions, ensure tenant safety, and uphold housing regulations. Additionally, it reflects efforts to combat criminal activities within the PRS, including organised crime, emphasising the vital role of enforcement in protecting tenants and maintaining community standards.

Figure 2 – Enforcement level model by local authorities for their PRS



(Goldstraw-White (2025))

3.33 The levels progress from minimal reactive responses to housing-related issues through to comprehensive proactive enforcement strategies, incorporating collaborative efforts with partner agencies to tackle both housing-related and criminal issues within the PRS:

Level 1: Reactive Housing Enforcement: This level represents a basic, reactive approach to housing enforcement, possibly due to resource issues or a lack of management or political will. Local authorities operate primarily in response to complaints raised by tenants or local residents about housing conditions, safety issues, or other concerns relating to PRS properties. Enforcement actions are limited, with few inspections carried out beyond the immediate scope of the complaints received. Civil penalties, if issued, are rare and typically reserved for the most blatant violations. Authorities at this level do not engage with criminal or organised crime issues relating to PRS properties, either due to a lack of awareness, resources, or an absence of a defined strategy to address such matters. This approach focuses narrowly on immediate housing concerns without considering broader systemic or criminal issues that may impact tenants and communities.

Level 2: Proactive Housing Enforcement: At this level, local authorities take a more proactive and structured approach to housing enforcement. Rather than relying solely on tenant complaints, they actively seek out issues by conducting routine inspections of PRS properties. These inspections aim to identify potential breaches of housing standards, safety concerns, and other issues impacting tenant welfare. Local authorities implement clear procedures to identify common problems, ensuring that officers are equipped to assess properties effectively and take appropriate action when needed. Efforts are focused on improving property conditions and enhancing the quality of life for tenants. Civil penalties and other enforcement actions are used as tools to address non-compliance, with authorities demonstrating a

willingness to act against landlords who fail to meet their obligations. However, at this stage, authorities may not fully recognise or prioritise the presence of criminal activity within the PRS. Even if indicators of criminality are identified during inspections or reported by external parties, little or no coordinated action is taken to address these issues. The focus remains primarily on housing-related matters rather than addressing potential links to broader criminal or organised crime activities.

Level 3: Proactive Housing Enforcement and Reactive Criminal Enforcement:

This level builds upon the proactive housing enforcement approach outlined in Level 2, incorporating additional responsiveness to criminal activity within the PRS. Local authorities continue to actively inspect properties, enforce housing standards, and take measures to improve tenant welfare. They maintain established procedures to identify and address housing issues proactively, ensuring that property conditions are regularly monitored and that landlords meet their legal obligations. At this level, local authorities begin to acknowledge the presence of criminal activity within PRS properties. However, their involvement in tackling such activity is primarily reactive. They recognise criminality when it is brought to their attention by external agencies, such as the police, community safety teams, or other community organisations. Examples of this might include responding to reports of possible exploitation of tenants, or the use of properties for organised crime activities, such as drug trafficking. While authorities demonstrate a willingness to support other agencies in addressing these issues, their enforcement of criminal activities remains reactive and reliant on external notifications. They do not proactively seek out criminal activity within the PRS or develop strategies to identify and address it independently. The focus on tackling crime is secondary to their primary role in housing enforcement, with their involvement limited to situations where outside agencies request assistance or provide intelligence.

Level 4: Proactive Housing Enforcement and Proactive Criminal Enforcement:

The highest level of enforcement represents a comprehensive and fully proactive strategy addressing both housing and criminal issues within PRS properties. Local authorities not only enforce housing standards through regular inspections and targeted actions to improve tenant welfare but also actively seek to identify and address criminality within the sector. At this level, authorities demonstrate a deep understanding of how the PRS can act as a facilitator of criminality, including organise crime. They proactively look for signs of criminal activity during inspections and investigations, such as modern slavery, drug-related operations, or other forms of exploitation, like cuckooing. Rather than waiting for external notifications, they actively work to uncover such activities as part of their enforcement strategy and everyday work. To achieve this, local authorities establish strong, collaborative partnerships with other agencies, including the police, Trading Standards, Gangmasters and Labour Abuse Authority (GLAA), Immigration and Enforcement as well as other local, regional and national organisations. They share intelligence and data to build a clearer picture of criminal

operations within the PRS, leveraging combined resources and powers to tackle these issues effectively. The approach at this level is holistic, integrating housing enforcement with efforts to disrupt criminal activities and with partner agencies who may have different or additional powers to contribute to this. By addressing the root causes of both housing breaches and criminal behaviour, local authorities at this stage ensure a safer and more secure environment for tenants, while holding landlords and criminal networks accountable for their actions.

- 3.34 This tiered model provides a clear and structured framework for evaluating and enhancing the enforcement strategies employed by local authority housing teams. It recognises the varying degrees of engagement and capability within local authorities, from reactive approaches focused solely on addressing housing complaints to fully integrated strategies that combine housing enforcement with proactive efforts to tackle criminality and organised crime.
- 3.35 By outlining distinct levels of enforcement, the model helps identify gaps in current practices and offers a pathway for authorities to evolve their approach in alignment with the complexity and scale of challenges within the PRS. It encourages a transition from minimal, complaint-driven responses to proactive, intelligence-led enforcement strategies that prioritise tenant welfare and public safety.
- 3.36 The progression through the levels underscores the importance of collaboration and resource sharing, emphasising the need for strong partnerships between local authorities, the police, and other agencies. At its highest level, the model demonstrates the value of a holistic approach that not only addresses substandard housing conditions but also disrupts criminal activity, creating safer, more secure communities.
- 3.37 Based on consultation evidence, most local authorities were at level 1 or 2, with few progressing to level 3 or 4. When asked about enforcement approaches within their respective authorities, officers provided various responses, which could be summarised into four key areas:
 - Lack of time and resources
 - No political or management support
 - Do not recognise they have a problem
 - Do not see the point
- 3.38 One of the biggest barriers to enforcement efforts in uncovering criminality, as raised by local authority officers, is limited resources. Those consulted explained that they are overwhelmed by their day-to-day responsibilities, leaving little capacity for proactive investigations. A lack of staff, combined with insufficient expertise in identifying and tackling organised crime within the PRS, further restricts their ability to take enforcement action. Without dedicated teams or specialised training, many authorities struggle to move beyond reactive work,

making it difficult to effectively disrupt criminal activity, as demonstrated by the following comments:

'One of the challenges is the resources to take this forward – if you are serious about this, it ties up resources over a long period of time.'

(Interviewee LA06)

'Post-2018, we've been stretched resource-wise, it's restricted our proactive work compared to what it was, say, five years ago. Bogged down with statutory work, it's been hard – the Pathfinder project has helped us have a more dedicated team to tackle these issues.'

(Interviewee LA08)

'We're sure there's fraudulent behaviour and money laundering going on, but we haven't got the resources or expertise to delve into that area. We're quite proactive in enforcement around housing legalisation but not criminality.'

(Interviewee LA10)

'At present even if we got more intelligence from the police, we do not have the resources to deal with an increase in casework.'

(Survey Respondent)

'We're not where I would want us to be to deal with the real criminal element – just too busy swamped with day-to-day service requests and tenant complaints. But I do know we do have a criminal element.'

(Interviewee LA04)

'We have insufficient management time to arrange joint training and meetings with professionals from other agencies. Our officers and management rarely find the time to do this. This results in lack of understanding and sometimes suspicion as to what we do and how we can work together to resolve this problem.'

(Survey Respondent)

3.39 Whereas for others the lack of suitably qualified and experienced staff was a major barrier:

'The reality is that most local authorities are in the process of recruiting more staff. There's a lack of experience and staff in this area – a lack of qualified people for the broader enforcement areas.'

(Interviewee LA01)

'We are under-resourced and even when vacancies are advertised there are no appropriately qualified candidates for the roles leaving us understaffed.'

(Survey Respondent)

'There's a shortage of Environmental Health Officers – it's these boots on the ground officers that lead to

improvement – take them on temporary – but it takes time and money though.'

(Interviewee WC06)

3.40 Many local authorities fail to acknowledge the presence of criminality within their PRS. While crime levels may vary depending on the area and its characteristics, it is unlikely that any local authority is entirely unaffected by criminal activity or organised crime. At times, local authorities appear to rely on others to report issues rather than proactively identifying criminal activity themselves. This is evident from the following quotes provided by those (not local authority) directly involved in tackling these issues:

'Some people just don't acknowledge they have a problem. Some say, 'I don't think we have a problem,' but really, they don't know what they are looking at. They're not totally shutting their eyes; they just don't realise what's going on.'

(Interviewee WC01)

'We contact a lot of local authorities about issues we identify, but we find all the time that people dismiss the issue. I don't know what more we can do.'

(Interviewee WC04)

3.41 In some cases, local authorities choose not to bother enforcing against criminality in their area, as they lack the resources to handle court proceedings or potential appeals. Others simply continue with their existing approach, failing to recognise the benefits of proactive enforcement or the potential revenue that could be generated through issues fines and penalties to non-compliant landlords, which could be used to address further issues in the PRS.

3.42 Finally, some local authorities are not proactive in tackling criminality in their PRS due to a lack of political backing or support from management. Sometimes even when they try to, they lack management support to continue it:

'Local authorities have strong powers to address issues, some authorities either choose not to use them or are prevented from using them according to their political climate.'

(Survey Respondent)

'We have a rogue landlord group and I'm noticing we're doing a lot of the investigation work even though there are resources elsewhere. In between meetings there's been little progress in some of the cases. We're constantly not going anywhere or not getting support.'

(Interviewee LA15)

Barriers to tackling criminality in PRS

3.43 The ability of local authority housing enforcement teams to effectively tackle criminal activity within the PRS is often hindered by a range of barriers. These challenges can limit enforcement capacity, reduce the effectiveness of interventions, and ultimately undermine efforts to protect tenants and maintain housing standards.

3.44 This section explores the key obstacles faced by enforcement teams, including difficulties in establishing and sustaining partnerships, challenges in data sharing, legal and regulatory constraints, and issues related to evidence gathering and officer training. Understanding these barriers is essential to developing practical solutions that enhance enforcement efforts and improve outcomes for tenants and communities.

Partnership working

3.45 Tackling criminal activity in the PRS properties requires a coordinated, multi-agency approach, particularly when addressing the challenges posed by organised crime. No single agency can effectively combat these issues alone; collaboration between local authorities, the police, and other enforcement bodies is essential. By sharing intelligence, resources, and enforcement powers, agencies can disrupt criminal operations more efficiently, protect communities, and ensure that the PRS remains a safe and lawful housing option. As echoed by interviewee comments:

'A multi-agency approach is key to everything.'

(Interviewee LA04)

'It needs to be a holistic approach and not working in silos and not talking to each other. If they're not, criminal gangs could slip through the cracks and continue to operate for another 2-3 years if not flagged up in some way.'

(Interviewee WC06)

3.46 However, in practice, many local authorities are not actively engaging with their neighbouring authorities or other enforcement agencies to jointly tackle criminal activity in the PRS. Crime knows no boundaries, and when it comes to organised crime, the issue extends beyond local areas – reaching at least a national level, if not an international one. One local authority officer pointed out what can happen when authorities do not talk:

'I was at a meeting, and it came to light that both my authority's housing officers were in the middle of trying to prosecute a landlord, as was another housing authority at the same time, but neither side knew until that chance meeting. Also, both authorities shared the same boundary.'

(Survey Respondent)

3.47 One of the key benefits agencies have found in tackling criminality together is that by using their various skills and powers collectively, they

can more effectively disrupt and address illegal activity. The following interview excerpts highlight how leveraging these powers has proven valuable in enforcement efforts.

'We don't have all the powers, money and skills individually, but between us we do.'

(Interviewee WC 02)

'We have powers that police don't have. We can get in (to the property) fast and track people down through systems. We can issue a Section 16 or use 235 to force a solicitor to tell us who has bought the property.'

(Interviewee LA12)

'We have done a number of exercises with the Police and Border Agencies – they recognise we have more powers for some things.'

(Interviewee LA09)

- 3.48 Yet, where local authorities have made efforts to try and collaborate with other council departments or external organisations, officers reported encountering several challenges, which are further explored in this section.
- 3.49 The composition of a team and its physical location play a crucial role in effective collaboration. Several interviewees highlighted the benefits of personnel embedded in housing enforcement teams from other agencies (such as the police or Trading Standards), or simply co-location of different organisations in the same building. This proximity seemed to foster better communication, the sharing of skills, faster decision-making, and overall, stronger working relationships:

'The importance of where you're based cannot be overestimated. Informal contact is important too, and you might get talking over coffee and find out something important.'

(Interviewee LA11)

'We are specialist trained and can support other agencies. We have officers embedded in various teams so they can work closely give us a presence and can identify opportunities for us or others to intervene in.'

(Interviewee LC18)

'Depends on who's in the team, like, if Trading Standards are embedded, the police or even ex policeman it makes a difference. Give you informal contacts – they know how things are done.'

(Survey Respondent)

- 3.50 However, people are key to forming and sustaining partnerships, and many collaborations are initiated through individual connections. The challenge arises when those individuals leave or are moved within their organisations, sometimes resulting in lost links and weakened cooperation:

'It's about the people we work with in those organisations - educating them and how we can work together. But if we lose a key contact, it really depends on the next person having knowledge about you and engaging.'

(Interviewee WC04)

'In long-term relationships staff change and that can change the involvement in the partnerships.'

(Interviewee WC01)

3.51 The police are obviously one of the most important agencies to work with and possess powers that differ significantly from those of local authorities, which can benefit each other. However, for the local authorities consulted for this project, engagement levels varied widely, ranging from little to no contact with the police to full cooperation and well-established joint working arrangements. Some positive comments included:

'Working with the police early on and identifying who we need to speak to was vital. We were very lucky to have ex-(police) officers onboard also and get to the right contacts and people. They came straight in and onboard from day one of the project. We didn't give-refer a lot of jobs at first, but it gave us the key to our foundations and now we work with two of the main hubs and they are heavily involved in what we are doing.'

(Interviewee LA02)

'We have good relationships with the police and a good understanding. We deal with like-minded people and have data-sharing agreements.'

(Interviewee LA04)

'The police have seen the link. They can come straight to us on LA find information through say selective licensing. We've got the correct paperwork in place, so we can exchange this information quite quickly.'

(Interviewee LA02a)

3.52 Others, however, were more critical of their relationship with their local police force:

'Our relationship with the police often depends on individuals. We try to use them regularly if we execute warrants, but it can take weeks for them to come back to us. I don't think they are set up for this – we need to get officers to come in and explain their different teams.'

(Interviewee LA07)

'Police partnership is patchy – they've got their own issues and challenges and a constant pressure on resources. It's been a challenge to get the police involved to support visits

to brothels. We had to put together a detailed business case for this.'

(Interviewee LA06)

'It would be good if we could have better working relationships with the police, like we do with the fire service. They only seem to come to us when they want help – for access or intelligence. Things could be happening under our noses, and we wouldn't know about it.'

(Interviewee LA08)

'Sometimes it is not easy to task the police with taking over an investigation started by the local authority. For example, it has taken 6 years for my organised crime group to be investigated by the police. They have already been prosecuted, but because they were seen as 'rogue' letting agents instead of 'drug barons', they did not get custodial sentences.'

(Survey Respondent)

3.53 One of the challenges of working with the police (and sometimes other agencies), as told by the interviewees, is managing competing priorities – not just in terms of resources but also due to the different thresholds applied to certain offences:

'Police have different priorities, and they don't always coincide with ours. We share things with them but get nothing back. We really could do with more help from them.'

(Interviewee LA06)

'Different priorities of partners is a barrier – especially with the police. We currently have an issue with some gang-related crime on the police list. But it's not 'Mr Big', so although it's a priority to us, it isn't to the police. We're very much police-led on organised crime and on their national policing priorities.'

(Interviewee LA05)

'The police don't always share or help to disrupt as they have a different view of disruption and intelligence sharing.'

(Interviewee LA11)

'Organised crime rings are dangerous and difficult individuals to deal with, Local authority officers should be able to pass cases to the police with greater ease with a view to them being properly investigated, but they don't always meet their threshold.'

(Survey Respondent)

'Serious violence is a key priority in this area and sometimes so this other work is quite resource-intensive and is lower down the pecking order. The relationship could be better but understand how it is – there are so many competing priorities.'

(Interviewee LA06)

'Our relationship could be better and more coordinated – it ebbs and flows with the police and depends on what else is happening.'

(Interviewee LA16)

'DWP often don't want to take cases on. They have a point scoring system, and if you don't have enough evidence to meet the threshold, it doesn't happen. On some occasions we've just taken it forward ourselves.'

(Interviewee LA06)

3.54 Working with internal departments – whether within the same local authority or across partner organisation – was highlighted as problematic for some consulted with. While some found collaboration straightforward, others faced challenges, particularly with council tax departments. This often stemmed from IT systems being shared with the housing benefits system or a general lack of understanding about data sharing permissions. The following quotes demonstrates these issues:

'Within the local authority all departments are very helpful. We share information and try to get cases taken forward – we have no issue there.'

(Interviewee LA06)

'The biggest barrier is not external – it's internal that's the biggest issue, even though we've got political backing and support. Some departments seem scared – we need strong leadership.'

(Interviewee LA02b)

'We have issues with government departments themselves not working together.'

(Survey Respondent)

3.55 Local authorities reported varying levels of success in engaging with external agencies. While some agencies were already accustomed to collaborative working, others required more effort to bring on board. Despite these challenges, most authorities that had tried to engage them managed to generate interest and establish partnerships to some degree. Departments and organisations mentioned as key collaborators included: Trading Standards, Home Office Immigration Enforcement (IE), the Gangmasters and Labour Abuse Authority (GLAA), Companies House, the Illegal Money Lending Team (ILMT), the Department for Work and Pensions (DWP), HMRC, and utility companies. Trading Standards was highlighted as a valuable partner, especially in relation to their recent Operation Jigsaw, which focuses on establishing regional coordination among PRS teams across England.

3.56 However, many interviewees expressed frustration over the lack of engagement with both HMRC and DWP. Collaboration was often described as a one-sided relationship, with little to no proactive involvement from these agencies. Many found it difficult to establish meaningful partnerships, making it challenging to share information or

coordinate enforcement efforts effectively. For example, as one local authority officers pointed out:

'Working with HMRC and DWP is very difficult, but they are crucial because of the bigger powers and bigger impact.'
(Interviewee LA12)

Data Sharing

3.57 It was apparent that one of the biggest barriers to joint working is the reluctance of organisations to share information. A key concern is the fear of breaking the law, particularly in relation to the General Data Protection Regulation (GDPR) under the Data Protection Act 2018. Feedback from those consulted was that many organisations either believed that data protection laws prevented them from sharing information, or they were hesitant due to the risk of non-compliance and the potential legal repercussions.

3.58 That said, the issue was often not the law itself but rather the misinterpretations of it by agencies, where the perceived risks of sharing data were seen to outweigh the benefits. In reality, the exemptions under Schedule 2 of the Data Protection Act allow data sharing for the purpose of investigating crime, therefore, no problems should be encountered. However, feedback from those interviewed suggested otherwise:

'People are nervous getting into trouble about what they can and can't share. We had two boroughs involved with the same landlord, even in the same meeting. The police were happy to share but one borough wouldn't without formal requests.'

(Interviewee WC01)

'You find yourselves having to chip away at an iceberg. They [in this instance the police] give you titbits of information but are frightened of breaching Data Protection – giving you too much information or disclosing something they shouldn't.'

(Interviewee WC04)

'Data sharing is far more difficult than originally thought. Issues included resourcing, people feeling it was another task to do, trying to understand the value – the wins and benefits, and real concerns around the Data Protection Act.'

(Interviewee LC08)

'We have challenges working with the HMRC – they don't want to share data. They tend to share with other boroughs, but not us.'

(Interviewee LA06)

3.59 Data sharing was also highlighted as problematic between local authority departments:

'In terms of data sharing internally it's a challenge. We are one council, but in terms of data and GDPR it seems it belongs to one department. With council tax we have limited access – just basic details – for some stuff we're only allowed to search by property, and we may only have the name, so we can't search. We hope we'd have overcome this by now.'

(Interviewee LA13)

'Sometimes internally sharing can be harder – they don't always understand what they can and can't share.'

(Interviewee LA18)

3.60 Some of those consulted pointed out that data sharing often lacks reciprocity, which can be discouraging for agencies that provide information but receive little or nothing in return, making them less willing to collaborate in the future:

'It feels as though cases are passed to other agencies, but little feedback comes back and communication is poor.'

(Survey Respondent)

'If they approach us for help and we ask them if they've got this piece of information, and they say they can't help us – well we can't help you then.'

(Interviewee WC01)

'It sometimes feels like a one-way street – we pass information on but get nothing in return.'

(Survey respondent)

3.61 Finally, some interviewees highlighted that certain local authorities and other partners are not fully utilising all the databases available for information sharing. This was either due to a lack of resources, a perception that some intelligence might be insignificant, or the fact that their authority was not signed up to certain databases.

'Databases for sharing intelligence are not fully being used, they think that local authorities only deal with civil matters. Also, councils are not signing up to Trading Standards IDB¹⁹ or using the Rogue Landlord Database when they should.'

(Interviewee WC02)

'When you enter information on our police partnership database it automatically puts a note on for say Trading Standards, but we don't have the equivalent dissemination route to the council.'

(Interviewee LC07)

'Even sharing low levels could be the start of the bigger stuff – crime usually starts at a lower level.'

¹⁹ IDB is the Trading Standards Information Intelligence Database, a secure platform used by some local authorities and enforcement agencies, to share, analyse, and manage intelligence about criminal activities, particularly those impacting consumers and businesses.

Legislation and regulation

3.62 Legal frameworks and regulatory requirements play a crucial role in maintaining standards within the PRS. However, in some cases, these laws and regulations can inadvertently create obstacles to identifying and investigating criminal activity. Complex laws, unclear regulations, and the burden of proof required for enforcement can limit the ability of authorities to take swift and effective action. This section explores how legal constraints may hinder efforts to tackle criminality within PRS properties, highlighting key challenges and potential areas for reform.

3.63 The most significant barrier highlighted by local authority enforcement teams was that they felt their legal powers were too limited to effectively tackle this issue. A key concern was their lack of investigative authority, with several officers noting that Trading Standards possessed greater enforcement powers, particularly in cases involving fraud and financial exploitation. This disparity hampers local authorities' ability to gather evidence, intervene swiftly, and hold offenders accountable, ultimately weakening enforcement efforts.

3.64 Another key issue raised was the legal framework governing illegal subletting. One officer suggested that stricter penalties should be introduced for those operating 'sham' licences, and that local authorities should be given greater enforcement powers to tackle non-compliant landlords and letting agents. They highlighted that Trading Standards can take action against any business, including letting agents and landlords, for breaches of professional due diligence under the Consumer Protection from Unfair Trading Regulations 2008 – a power reinforced under the Digital Markets, Competition and Consumers Act 2024 when it came into force in January 2025. They felt that if similar offences existed within housing legislation to address fraud and deceptive practices this would be greatly beneficial.

3.65 One officer felt that the use of Closure Orders should be widened. At present, these orders apply only to the property itself and do not automatically hold landlords accountable unless they are found to be complicit or negligent. While the primary purpose of Closure Orders is to halt criminal activity, it was felt that landlords who repeatedly receive such orders or demonstrate a pattern of neglect should face stronger enforcement measures. These could include financial penalties, loss of rental licences, or bans on letting properties, ensuring that irresponsible landlords are held accountable for persistent issues linked to their properties.

3.66 Regarding the clarity of current laws, some officers highlighted ambiguities in the legal definitions of 'person having control' and 'person managing' under the Housing Act 2004 (Section 263). These uncertainties create enforcement challenges, especially in cases involving complex rental structures. The law currently distinguishes

between those entitled to receive rent (often the owner) and those directly managing the property (such as agents or intermediaries). However, proving control can be difficult, especially when layered arrangements involve intermediaries or front entities. It was felt that clearer legislation is needed to explicitly define landlord responsibilities, ensuring accountability at every level and preventing bad actors from exploiting legal loopholes.

- 3.67 In addition to concerns about the law, interviewees highlighted potential reforms to civil penalties that could strengthen enforcement against criminality in the PRS. A widely supported suggestion was the recording of civil penalties on the Land Registry. Currently, civil penalties for housing offences do not appear as charges on there unless the landlord fails to pay and the local authority takes further action, such as obtaining a Charging Order. Interviewees felt that if civil penalties were recorded similarly to improvement notices, it would serve as a strong deterrent to criminal landlords, making it harder for them to operate undetected. Additionally, it was suggested that persistent non-payment of civil penalties should escalate to a criminal offence, ensuring repeat offenders face harsher consequences beyond financial penalties.
- 3.68 Feedback from local authority enforcement officers suggested that the use of civil penalties has proven to be an effective tool in disrupting criminal landlord behaviour. However, they felt that the scope of these penalties could be expanded to cover additional housing-related offences, allowing local authorities to take swifter action without the need for lengthy and costly criminal prosecutions. By operating under the civil standard of proof 'on the balance of probabilities', rather than 'beyond reasonable doubt', this approach would also lower the evidentiary threshold, making enforcement more efficient and accessible for local authorities.
- 3.69 The final issue raised by enforcement officers regarding legislation and regulations was the delays in the court system. These delays have worsened since Covid, significantly hindering PRS enforcement by slowing down prosecutions, financial penalties, and appeals. Feedback from officers suggested that even when decisions are made on paper, local authorities are left in limbo, with no clear timeline for when rulings will be issued. This uncertainty weakens enforcement efforts, allowing criminal landlords to continue operating unchecked while cases remain unresolved.

Obtaining the evidence and taking action

- 3.70 Detecting criminal activity within PRS properties can be challenging, particularly when offenders take deliberate steps to avoid detection. Potential signs may range from physical property damage to suspicious tenant behaviour but many of these may be hidden. However, recognising these indicators is only the first step. Gathering sufficient evidence to support prosecution and identifying who to take action

against present further difficulties. This section examines what those interviewed said about the challenges involved in collecting legally admissible evidence and taking enforcement action.

3.71 Housing enforcement officers frequently encounter challenges in gathering sufficient evidence to prove criminal activity, even when strong suspicions exist. As one interviewee aptly stated:

'What we know and what we can prove are two different things.'

(Interviewee LC04)

3.72 This illustrates the frustration created with the difficulty of bridging the gap between intelligence and acquiring admissible evidence to back it up. Even when links are suspected to more serious organised crime it is sometimes a struggle to secure the necessary evidence to progress cases, leading to stalled investigations:

'Through our involvement as PRS enforcement there is often a hunch that other activities associated with organised crime are taking place, but it is difficult to gather evidence of this.'

(Survey Respondent)

3.73 This highlights the critical role of communication and intelligence sharing among local authorities and enforcement agencies. By pooling information, they can build stronger cases against landlords (or other offenders), increasing the likelihood of effective action. As one local authority officer put it:

'We're never going to hit the trigger, for example, to have a banning order ... but clearly, they are poor landlords. But if everyone has something on that person, it's a different matter.'

(Interviewee LA15)

3.74 This challenge is further compounded in HMOs, where it difficult to ascertain who resides in a property creating further barriers to enforcement. As another respondent highlighted:

'Sometimes we have no idea who is in these properties.'

(Survey Respondent)

3.75 Others raised concerns that not all local authorities have access to a wide range of databases (paid or otherwise) and therefore their ability to use key intelligence sources is limited:

'We rely heavily on tenants and landlords for information, but this is often unreliable, or difficult to get.'

(Interviewee LA01)

3.76 Many interviewees reported that relying solely on tenants to report issues is often ineffective, as many may be unwilling to do this, hesitant to speak openly, or even if they do, provide misleading information. This is

especially true for migrant communities, who may face language barriers, frequent relocations, and a general reluctance to engage with authorities. Many tend to stay within their own communities, are uncertain about housing standards, or may even be accustomed to poor living conditions from their home countries. In some cases, officers believed that tenants had been explicitly told not to speak to anyone, and even when they did, their responses often seemed rehearsed, as if they have been coached and told what to say. The following quotes illustrate these issues:

'We get complaints from the English-speaking population but not much otherwise. We try and do things differently, but in an areas that are very diverse culturally and religious wise, expectations of what is acceptable at a property varies.'

(Interviewee LA15)

'Some populations, especially migrant ones, move around and say they cannot speak the language. They don't tend to engage with the authorities – they're more likely to go to their elders or their community for assistance – people they respect.'

(Interviewee LA05)

'We're just trying to do what we can to try and empower those difficult to reach tenants. We've had a lot of migrants in the last 5-10 years who lack awareness and knowledge of their rights. They're in overcrowded situations but they don't engage – it's not an issue to them – they feel intimidated and worried about their immigration status.'

(Interviewee LA07)

'The public need more education to help them with the rental sector, particularly when their first language is not English.'

(Survey Respondent)

'Everyone puts their coat on, want to be elsewhere – won't talk.'

(Interviewee WC01)

'With some you get the feeling that they've been told what to tell you – each give the same answers, in the same way, it becomes obvious.'

(Interviewee WC04)

3.77 Many tenants refuse to report issues or provide details to authorities due to fear of retaliation, particularly from landlords. The risk of eviction or homelessness is a major concern, especially in the current climate of high housing demand, leaving them feeling vulnerable and powerless to take action. The quotes below illustrate their fears:

'I am sure that a lot of landlord crime is not reported to the Private Sector Housing Team because residents are afraid of becoming homeless or are threatened with violence.'

(Survey Respondent)

'The demand for housing is such that occupants often won't respond to questions for fear of being evicted.'

(Survey Respondent)

3.78 In such cases, some interviewees felt it important to strike a balance between persistence and respecting their reluctance to engage. They felt that the key was to ensure they knew support was available and that someone would be there for them in the future if they chose to come forward, as this quote shows:

'They don't always talk or won't open up straightaway. What you've got to do is to build blocks and sow the seeds. Visit more than once – go along and engage, it's rare they don't want to speak at all. We then give them the leaflet, in their own language, and if anything happens in the future, they're assured someone will listen to them. It might be 6 months later – they might not get paid or something – so then they tell somebody.'

(Interviewee WC04)

3.79 One of the biggest challenges in prosecuting landlords or imposing civil penalties is identifying the correct individual or entity to take action against. Interviewees highlighted how difficult it can be to determine who is responsible, as the legal definition of a landlord can be complex, and uncovering their true identity is often even more challenging. Landlords operating illegally frequently go to great lengths to obscure their identities. They may register properties under different names – often using friends or family – or exploit outdated official records, such as the Land Registry, to remain hidden. Some simply move out of the area, making them even harder to track. This creates a tangled web that is time-consuming and resource-intensive for enforcement agencies to unravel. The following quotes demonstrate this:

'We've got a major case at the moment with a landlord who preys on vulnerable tenants, but it's hard to pin him down. All the tenants know of him, is that he's 'the landlord'.'

(Interviewee LA15)

'The difficulty is identifying the tenure of a property and those with an interest in it. Makes proactive work against them resource intensive.'

(Survey Respondent)

'With organised crime groups, it's not the top men you come across, for example, with cannabis grows, we go there but end up dealing with the 'gardener' – you just have to accept you've got a little bit closer.'

(Interviewee LC01)

'Where that landlord is a limited company and we start to investigate, sometimes they will transfer the lease to another company which can frustrate our investigations.'

3.80 Absentee landlords not only fail in their duties of not knowing what is going on in their properties, but enforcing regulations against landlords who are absent or based overseas was raised by a number of interviewees as a difficult area to tackle. Many overseas landlords hide behind complex ownership structures, nominee arrangements, or shell companies, making it difficult to identify who is truly responsible for a property. The following quotes highlight just how frustrating and complex this issue can be for those trying to hold landlords accountable:

'There's plenty of absentee landlords that don't know what going on – that's where the crimes are – when they know they are not going to be inspected.'

(Interviewee LC12)

'Dealing with overseas landlords is difficult. In some London areas the real estate is so expensive, most landlords are overseas. It's hard to get to them and you end up dealing with managing people – who might be owners, but you can't tell.'

(Interviewee WC01)

'We're about to look at licences granted to some managing agents, sometimes these change and are not in the UK anymore. If so, we'll take action against them for breach of conditions.'

(Interviewee LA07)

Awareness/education/sharing

3.81 Raising awareness at all levels about the crucial role local authorities play in tackling criminality, particularly in the PRS, is essential. Feedback from consultations found that there is a common misconception among the public and external partners that councils only handle civil matters, overlooking their significant enforcement and criminal justice responsibilities. As one officer from a large local authority pointed out about behaviour identified in their PRS:

'Even our new enforcement officers did not expect it to be criminal. They were initially scared because they were not the police. But it is part of their role.'

(Interviewee LC02)

3.82 This lack of understanding about housing enforcement teams investigating landlords also existed with some police forces and some interviewees commented that they often face challenges here. Sometimes the lack of knowledge by the police about housing-related issues has resulted in them wrongly supporting landlords during illegal evictions, an issue that was raised by a number of those consulted with. As one interviewee commented:

'We need to get housing issues on police training like they did with doorstep crime, and then ensure they share that intelligence if anything is identified.'

(Interviewee WC02)

3.83 At a more specific level, many felt that housing enforcement officers and others who might encounter criminality in PRS properties needed training beyond their usual housing enforcement duties. There was broad recognition that not everyone would immediately recognise criminal activity, and while they did not need to be experts, developing a basic awareness was seen as essential. Effective enforcement requires a range of skills beyond investigations, including gathering evidence, interviewing suspects, and engaging sensitively with potential victims. While a handful of local authorities had begun expanding training for their officers, many others had yet to take this step.

'Local authority housing staff need further training. They generally don't have training in things like PACE, RIPA evidence storage etc. They also generally need training on what to spot in properties as potential signs of crime.'

(Interviewee WC02)

'Officers are trained in evidence, investigation and taking statements. We've got them looking for other things. Some officers are still blinkered, but they need to look at the wider picture, not just deal with the immediate issue.'

(Interviewee LA12)

'PRS officers are not trained in fraud or looking to the bigger criminality picture unlike Trading Standards as they handle fraud cases. Police can do fraud, but they only deal with large scale fraud and they look at this [housing fraud] as a civil issue, which is wrong.'

(Survey Respondent)

Suggestions for improvements

3.84 This section presents feedback from wider consultations on improving approaches to tackling criminality in the PRS. Those consulted highlighted gaps in current efforts and offered suggestions for addressing overlooked issues, as well as general areas where improvements could be made. At the time of writing, two legislative changes were underway that could potentially address some of the issues raised: the Renters' Rights Bill and the Crime and Policing Bill.

3.85 Areas for suggested improvements included:

- **Increased regulation of landlords and property managers:** a number of those consulted felt that current regulations did not go far enough in who could become a landlord and how they conducted their business. Some called for landlords and letting agents to hold

qualifications before offering properties to rent. Others called for greater accountability and stricter penalties for non-compliance.

- **Organised Crime Strategy:** local authorities should be mandated by law to develop and maintain an Organised Crime Strategy in the same way they are mandated to have other strategies and plans in place (e.g. for homelessness and waste management).
- **A landlord database should be established:** this should contain enough information (such as name, their home addresses, date of birth and national insurance number, with registration confirmed through photo ID) to enable enforcement agencies to trace and contact the landlord. The proposed Landlord Portal in the Renters Reforms' Bill could address this area.
- **Proactive checking of legal responsibilities:** often when a landlord has failed in their duties, this only comes to light later when something goes wrong. There is no/little proactive checking on the legal responsibilities of a landlord before letting to tenants (such as recording right-to-rent, tenancy agreements, gas certificates, Energy Performance Certificates (EPCs), electrical checks etc.).
- **Increased use of civil penalties:** some suggested that civil penalties should be applied to a broader range of offences and that these penalties should be made more severe to ensure greater compliance and accountability. Others suggested that being able to log civil penalties on the Land Registry would serve as a major deterrent to landlords.
- **Closer alignment of powers:** a number of consultees raised the issue that Trading Standards investigatory powers appeared wider than those granted to housing teams. They also felt that Agreed Investigatory Powers should be further aligned to streamline efforts and tackle criminality in the PRS more effectively.
- **Area-based legislation:** one officer that was consulted suggested that as areas are so different, sometimes legislation based on areas would be more appropriate.
- **Information on county lines:** more advanced information, without compromising confidentiality, was requested by one officer consulted to help them remain vigilant for associated criminal activities in their PRS properties.
- **Formal partnership assessments:** someone raised the issue that local authority housing partnerships with the police and fire services should exist nationally, and those partnership arrangements should form part of the HMICFRS visits. These assessments should identify and tackle landlord criminality.

- **Partnering with the finance and banking sector:** in some local authorities where more advance enforcement against criminality took place, they suggested that further work with the banking and finance sector, especially around buy-to-let mortgages might be useful in identifying potential landlord criminality.
- **Finding a better fit** some of those interviewed felt that consideration should be given to where criminality in the PRS relating to organised crime best fits in the government's agenda. They expressed a concern that if left with housing, reality might not be dealt with, though if left with the Home Office, housing issues might not be addressed.

Summary

3.86 The findings indicate that the PRS is increasingly linked to various forms of criminality, including organised crime. While some landlords are directly involved, others unknowingly enable illegal activity. Many local authorities remain reactive, addressing only housing-related breaches due to resource constraints. Those taking a proactive approach, often with local partners, face barriers such as limited enforcement powers, insufficient evidence from vulnerable tenants, and difficulties in identifying landlords. However, some stakeholders believe enforcement efforts could be strengthened and have proposed key improvements to enhance effectiveness.

Section 4. Conclusion

- 4.1 The presence of criminality within the PRS is an undeniable growing issue. Fraudulent landlords exploit tenants through illegal evictions, substandard housing, and financial scams, while organised crime groups use rental properties for modern slavery, drug production, human trafficking, and other illicit activities. Local authorities are responsible for enforcement but often lack the resources to conduct criminal investigations beyond housing safety compliance. This lack of current oversight coupled with the fragmented nature of the PRS often allows criminal activities to go undetected.
- 4.2 Local authorities are seen as the frontline in tackling criminality within the PRS, yet their response varies widely. Some argue that local councils lack the necessary resources and enforcement powers to effectively deal with criminal landlords and OCGs operating in their PRS. Investigatory restrictions, difficulties in identifying actual landlords, and the reluctance of vulnerable tenants to report criminality, all create significant obstacles.
- 4.3 However, others contend that many local authorities are simply not proactive enough. Instead of using existing powers to their full extent, some councils remain reactive, responding only to complaints rather than actively seeking out criminal activity. With organised crime becoming increasingly sophisticated, the issue may not be a lack of powers but rather a matter of prioritisation.
- 4.4 Landlords are at the heart of the debate. While there are many good and legitimate landlords in the PRS, some, including letting agencies, knowingly participate in illegal activities, while others inadvertently facilitate them by renting properties to criminal groups. It could be argued that too many landlords prioritise profit over tenant welfare, turning a blind eye to criminal behaviour if the rent is paid. The issue of stricter penalties for landlords who fail to conduct proper checks on tenants and their properties raises concerns about balancing accountability and fairness. While increased penalties could enhance compliance and tenant protection, they may also impose extra burdens on responsible landlords already navigating a complex, evolving regulatory landscape, as well as on overstretched councils.
- 4.5 Current legislation is often described as inconsistent and fragmented. While the Housing Act 2004 provides some enforcement powers, gaps remain, particularly in tackling organised crime and cross-border criminal networks operating within the PRS. Proposals for a national landlord register and greater intelligence sharing have been suggested as solutions, but whether these measures will be sufficient remains to be seen, and the issue of resources to implement and maintain these systems is key.
- 4.6 It can be argued that adding more laws to an already complicated system is not the answer. Instead, better use of existing legislation, increased

training for enforcement officers, and stronger collaboration between local authorities, police, and other enforcement agencies could yield more immediate results. A key question is whether a system primarily designed for housing issues can ever be robust enough to tackle serious criminality. Additionally, there is ongoing debate over where leadership for this issue should sit within the government – whether within housing policy or as part of a broader criminal justice strategy.

- 4.7 So where do we go from here? There is no simple solution to tackling PRS criminality. While local authorities need greater support, landlords must also take more responsibility, and enforcement agencies must improve intelligence sharing. The key question is whether the answer lies in stronger legislation, better enforcement, or a complete rethink of how the PRS is regulated. Without urgent action, criminal activity will continue to thrive in the gaps between policy, enforcement, and accountability. The challenge now is deciding who is best placed to step up to close them.

Section 5. Recommendations

5.1 Based on the findings outlined in this report, the following recommendations are proposed to address key challenges and to support improved detection and disruption of PRS-associated crime.

A Local Authorities

A1 Working with relevant partners, all local authorities should identify, investigate, and act on all types of criminal activity that occurs in PRS properties within their sphere of responsibility. Such criminal activity is an endemic problem that materially corrodes the sector and blights daily life in communities with high levels of PRS homes across the country.

A2 All local authorities should be required to devise and implement an Organised Crime Strategy (OCS) to enhance coordination and response efforts. Similar to the strategies of local Health and Wellbeing Partnerships, OCSs would help ensure that all partners took organised crime seriously (see also Recommendation D1).

B Legislation and Regulation

B1 Local authorities need enhanced investigatory powers, similar to the ones available to Trading Standards Teams – particularly on financial matters. This should include access to digital records, access to rental payments held by the Department for Work and Pensions (DWP) and banking details. Currently, limitations make it hard to identify, for evidential purposes, the person in control of a property that is being used for criminal activities. These constraints are being exploited by criminals to hide and avoid detection and legal action.

B2 Anomalies in accessing digital data within the framework of the Regulation of Investigatory Powers Act (RIPA) 2000 need to be resolved. As it stands, under the Investigatory Powers Act (IPA) 2016, a local authority can only lawfully obtain 'communications data', if a crime meets the Act's 'serious crime' threshold and if the authority follows the authorisation procedure prescribed by the legislation. In most cases, private sector housing enforcement will not satisfy these conditions. It is a criminal offence to obtain data without meeting these requirements. However, there is an exemption in the Act that allows local authorities to obtain communications data when investigating a case where the intention is to serve a civil penalty, should the offence be proven. But the same communications data cannot be used where a criminal prosecution is within the contemplation of enforcement agencies. This is a clear anomaly which hampers local housing authorities.

B3 The Housing Act 2004 (ss. 235 & 237) vests power in local authorities to require documentation to be produced for functions under Parts 1-4 of the Act. These powers should be extended to include other public sector

bodies, such as HMRC and DWP. Access to intelligence is critical, especially for proving ownership and the person in control. Closer working and easier access to information would help put an end to criminals who are evading detection and prosecution by taking advantage of inadequate data sharing.

B4 Legislation to deal with the incidence of ‘cuckooing’ is overdue. To be effective, this would need to provide a sound and workable definition and make it a criminal offence. (It is hoped that the new Crime and Policing Bill will fill this legislative gap.)

B5 It should be made a legal requirement for sellers of PRS stock to report all property sales/change of ownership to the Land Registry within a specified timeframe, ideally no later than three months from the point of sale. Land Registry information is currently used as the legal address for the service of notices. However, details can be inaccurate and/or out of date. This is something that criminals can exploit to avoid detection. This requirement could be incorporated in the Renters’ Right Bill as an offence. The onus could be placed on the seller in the same way that reporting the sale of a car to the Driver and Vehicle Licensing Authority is the responsibility of the seller, with property vendors remaining liable if they fail to notify the Land Registry.

B6 A clearer legal definition of a ‘landlord’ is required to help stop criminals hiding their identity. The Housing Act 2004 creates ambiguity in its distinction between:

- ‘Person in Control’ (the person receiving the rack rent, i.e. not less than two-thirds of the net annual value of the property – normally called ‘the landlord’); and
- ‘Person Managing’ (a person receiving payment as, for example, an agent).

Criminals can set up layered rental structures that enable them to escape identification as the landlord and thereby to dodge their legal responsibilities and liabilities. A ‘landlord’ should be defined as anyone who receives any part of the rent.

B7 Renting out residential properties should be defined as a business and be regulated accordingly. This would bring it into line with the regulation of providers of consumer services.

B8 A dedicated legislative framework that aligns with the principles governing PRS properties should be established to regulate Airbnb properties. Some criminals use Airbnbs as part of their business model for setting up pop-up brothels, trafficking people and selling drugs. Using Airbnbs gives criminals extra mobility and helps make them more agile in the conduct of their business: they can set up, disappear and move their operations to other administrative locales rapidly and without detection. Short-term lets are currently exempt from licensing in England. Removing this exemption

and adopting a licensing system for short-term lets – similar to the one already in place in Scotland – would help remove the advantage that Airbnbs currently give criminals.

C Intelligence and Data Sharing

C1 Government should put in place a system to allow all local authorities to share intelligence. Trading Standards have a model – the Intelligence Database (IDB) – which could be further developed to provide a national intelligence database for local housing authorities and other agencies. The running costs could be covered by the income generated from the levy of the proposed charge for landlord/property registration on the portal, as proposed in Recommendation F1 below.

C2 Government should provide local authorities and partner organisations tackling criminality in the PRS with clear guidelines on how to handle and act on intelligence and information. Research undertaken as part of this project found:

- A high level of anxiety among participating local authorities and other enforcement agencies on the question of when or whether it was permissible to disclose intelligence/information to other organisations.
- Inconsistent approaches to intelligence/data sharing within and between local authorities.

Clear Government guidance should help reduce anxiety about potential breaches and increase legitimate dataflow among enforcement agencies – thereby making detection and disruption efforts more efficient and more effective.

C3 All local police forces and specialist units should establish a central intelligence portal accessible to local partners, if they do not have one already. These portals should be linked together to form a national database. This would support the identification of crime via shared intelligence and would improve understanding of the shape and dynamics of PRS-related criminal activity both locally and nationally. As working proof of concept, the intelligence portal set up by West Yorkshire Police continues to demonstrate its value in achieving these ends within the region. All police forces should adopt a similar model.

C4 Local partners involved in addressing criminality in the PRS should devise, share and put into operation model Memoranda of Understanding and Data Sharing Agreements to help reduce the problems encountered with information sharing.

C5 Government should encourage enforcement agencies to make sure that all relevant staff are both aware of the full range of intelligence sources they can draw from and are trained in how to secure and disclose relevant information from/to these sources. Databases for credit checks are available for general public use and provide considerable additional

intelligence which can be used to address housing offences and detect criminality in local areas.

C6 In pursuing intelligence potentially relevant to suspected PRS crime, local authorities should make full use of their powers to interrogate the Rogue Landlord Database established under the Housing and Planning Act 2016 and in doing so they should consider:

- Addressing concerns about specific offences and registration periods; and
- Introducing additional penalties, including those related to non-housing offences.

C7 The Home Office should consider allowing authorised local authority housing teams/officers access to the Police National Database (PND). This would allow better sharing of information to identify those linked to, and involved in, crime. Such consideration should take account of the strong evidence that criminals who use the PRS as part of their business model are usually involved in wider criminality.

C8 Local housing authorities should be recognised as part of the Government Agency Intelligence Network (GAIN). The PRS is widely used by OCGs to launder money, traffic victims, grow and sell drugs and house people subject to sexual and employment exploitation – and yet the use of the PRS is not recognised as an important contributory factor in the commission of serious crime. This oversight needs to be remedied in order to support the disruption of OCG activity nationally and internationally.

C9 The new Renters' Rights Bill provides for a national landlord and property portal. It is essential that the portal is designed to take full account of the needs of local authorities and their partners in tackling PRS-related crime effectively. In particular, the data specification profile must meet the needs of local authorities for these purposes. Specifically, to check that landlords are who they say they are, local authorities must be able to access the following information held on the register through the portal: full name, date of birth, National Insurance number, personal address (and proof of this), formal proof of property ownership, the names of all parties with an interest in the property (i.e. who receive any part of the rental income), and ID (including photo ID) – plus documents relating to the property, such as electrical and gas certification, rental agreements and any eviction notices. All of these are required as part of the selective licensing application in Leeds, and it has made a significant difference in detecting and disrupting crime in the city. Failure to comply with these requirements should attract a significant civil penalty and be part of any new legislation allowing LHAs to consider a banning order.

D Awareness

D1 Senior leaders within local government (perhaps with the support of the Local Government Association) must:

- fully recognise the role of local authorities in addressing criminality and organised crime;
- raise awareness; and
- proactively engage local housing authorities in local crime partnerships.

PRS housing professionals tend to be narrowly focussed on bricks and mortar/damp and mould and other housing-specific matters. Without a wider perspective, they do not generally make connections between the incidence of common housing problems and criminal activities going on in the PRS. Local authorities should lead on the establishment of partnerships between housing, the police, and fire and rescue services. These partnerships should have in place formal arrangements to sustain them once they are established, and to mitigate the risk of losing impetus in the event of key personnel leaving. Partnerships should have as their key driver a fully thought-out, implemented, and periodically reviewed organised crime strategy (OCS). An OCS will ensure that all agencies come together to form a coherent approach to the issue, fully understand their respective roles, and maximise the opportunities to work together to combat OCGs locally, regionally and nationally. These partnerships should come under the auspices of His Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) regime. This would mean that the issue of criminality in its widest sense was something that agencies were compelled to consider as part of their overall strategic approach to crime and safety and were accountable for their performance.

D2 Local police forces and specialist units, such as Regional Organised Crime Units (ROCUs), should strengthen engagement with local authorities to combat criminality in the PRS. An OCS would support the establishment and running of such a partnership.

E Training and Education

E1 Local authorities and partners should provide full training for all members of their staff who visit PRS properties as part of their work, so that they are properly equipped to identify potential 'red flags' of criminal activity.

E2 With the support of partners, local authorities should make sure that all relevant members of their staff are sufficiently trained in investigating criminal activity in the PRS. If officers do not understand what they are seeing as part of their visits to PRS properties, criminality will go unchecked.

E3 Police training courses should cover housing issues and their links to crime. This would raise awareness within police services of wider criminal

issues and the need for a partnership approach to dealing with criminality in the PRS.

F Resources

F1 Money must be made available to local housing authorities both to:

- enable them to proactively discharge their duties on housing enforcement to improve housing conditions; and
- fund effective crime detection operations.

Currently, there are very limited resources available for these purposes. As part of the Renters' Rights Bill, an annual per-property charge for registering on the portal could be made, which could then be used to fund local authority activity to address housing standards. This would solve funding issues in the longer term by providing authorities with ringfenced funding for housing enforcement (as is currently the case with civil penalty income). This would help to sustain a permanent officer presence within LHAs to address standards and criminality. It seems appropriate to apply the 'polluter pays' principle adopted in many other sectors to the regulation and improvement of privately rented housing – rather than ask the local taxpayer to fund it. For PRS regulation, this principle is already a feature of property licensing under Part III of the Housing Act 2004: licensing schemes are self-funding and place no burden on the General Fund of local authorities.

F2 Political support at all levels – national and local – is essential to recognise and address landlord criminality.

G Research

G1 Although the use of the PRS for criminal purposes is a significant issue, there has been little research into the extent and impact of how criminals and OCGs use the sector as part of their business models. Further research is needed to:

- Better understand the links between the PRS and criminality, particularly organised crime;
- Assess the cost to communities and the wider economic; and
- Support strategies to find better ways to disrupt PRS-related crime and enforce against it.

H Other

H1 Government should consider granting powers to local authorities to enable them to access data from the finance and banking sectors in order to help them (local authorities) identify potential landlord criminality. The use of production orders by Trading Standards would be an important

point of reference in framing these powers and their use by local authorities.

- H2 Government must decide which is the most appropriate department to lead on tackling organised crime within the PRS. It is the recommendation of this report that it should be the Home Office. The Home Office currently leads on key policing and community safety initiatives such as the Clear, Hold, Build approach and the Safer Streets agenda. These relate more closely to the wider impact of PRS-based crime on local communities than the purely housing-focused responsibilities of MHCLG. This is not to underestimate the crucial role of housing standards enforcement in tackling PRS-based crime; what is being suggested here is a cross-departmental approach led by crime-focused Home Office colleagues.
- H3 Government and all other relevant agencies should take the lead in seeking to effect a change in the language and discourse around landlord criminality. The term 'rogue landlord' in particular is misleading and to some extent trivialises the issue: these landlords are using the PRS as part of their crime business model, not just letting poor quality homes. They are criminals and should be described as such.
- H4 Government and all relevant agencies should consider how to foster better ways of networking across the country so that experiences and knowledge can be better shared and understood by housing officers. Currently, Operation Jigsaw is supporting improved networking – although it has a limited life. It has been led by the National Trading Standards' Estate and Letting Agency Team with the aim of bringing together LHAs to help address standards in the PRS. This sharing of good practice has grown over the course of the project and the initiative has been invaluable in bringing together those who would never normally meet, enabling them to learn from one another and to forge new networks and partnerships. This way of working and support is essential if criminality is to be addressed in the PRS.
- H5 The toolkit which has been developed by Leeds City Council as part of the MHCLG PRS Pathfinder programme will provide considerable support for local agencies. To maximise its reach and positive influence, Government should make sure it is widely and energetically promoted. It should be hosted on the GOV.UK website to boost its accessibility and profile.

Appendix A – Methodology

Introduction

This section outlines the methodologies employed to achieve the research objectives specified in Section 1. A mixed-methods approach was adopted, integrating both qualitative and quantitative strategies to ensure a comprehensive and robust analysis. This approach was driven by a needs-oriented perspective, emphasising the alignment of methodologies with the study's overarching purpose, expected outcomes, and key deliverables. By combining data collection and analysis techniques, the study aimed to enhance validity, capture a multifaceted understanding of the research problem, and provide actionable insights. Further details about the specific techniques employed for the various parts of the project are detailed in the subsequent subsections.

Literature review

A short literature review was conducted to identify and analyse relevant academic and grey literature related to criminality in the PRS, as well 'rogue' landlord behaviour, particularly in the context of organised crime. This review included an examination of both historical and contemporary research, alongside policy framework documentation, to ensure a thorough understanding of the evolving regulatory landscape and enforcement measures.

The search strategy employed a systematic approach, utilising key academic databases (such as Google Scholar and Web of Science), alongside governmental and industry reports. Boolean search techniques were applied to refine searches and maximise the retrieval of pertinent sources. These searches were complemented by grey literature sources, including reports from government agencies, landlord and tenant associations, housing charities, and journalistic pieces, to capture practical insights and real-world implications beyond purely academic discourse.

The synthesis of these materials provided a comprehensive understanding of the current knowledge regarding criminality in the PRS, particularly that associated with organised crime. Drawing from the themes, concepts, and variables identified in the literature, this assisted in the formulation of questions for consultations and the survey.

Survey

Following a presentation to the Local Government Association's Community Advisory Safety Network by Mark Ireland (Leeds City Council) and Dr. Janice Goldstraw-White (Perpetuity Research), a short online survey was conducted to explore officers' perceptions of the extent and nature of criminal activity within their PRS properties and their local housing authority's response. The survey was open from Thursday, 10th October, to Friday, 25th October 2024.

A total of 22 individuals took part in the survey, though not all respondents completed every question. The data were analysed using SPSS. As the data

are categorical, it was not possible to assess normality, which should be considered when interpreting the findings.

Results of the survey can be seen in Appendix B.

Wider consultations

The purpose here was to engage with local authority housing officers and other relevant stakeholders throughout England who could provide valuable insights for the research – their experience of criminality in the PRS and their response to it. Before undertaking any interviews, an interview schedule was drawn up and agreed with the Project Team. The interview schedule was designed based on insights from the literature review and previous research, ensuring a comprehensive exploration of the subject matter.

Many of the individuals we engaged with were referred to us by Mark Ireland (Leeds City Council) having made initial contact with these officers, while others directed us to additional contacts. We also leveraged personal networks, and some participants voluntarily offered further insights after completing the survey. This method of obtaining participants ensured that those involved were well-informed about the research topic, leading to richer and more relevant responses.

The interviews, which typically lasted around one hour (ranging from 30 minutes to two hours), followed a semi-structured format, allowing for flexibility to explore key issues in greater depth. In total, 31 professionals from 25 organisations, including 18 local authorities, were interviewed.

Quotations used throughout the report were derived from four areas: survey respondents; wider consultations (WC); local consultations (LC) and local authority interviews (LA).

Data analysis

For the data acquired from interviews, a systematic approach was undertaken to review these by using an analytical thematic framework to reflect the key research objectives and allow for consideration of other relevant themes arising from the findings. This was broken down into five key stages:

1. Familiarisation with the data.
2. Identifying and refining the thematic framework.
3. Indexing the data to sort illustrative quotes and make comparisons.
4. Charting to arrange the quotes and observations into the newly developed thematic content.
5. Mapping and interpretation to build the relationships between the interviews/quotes and the links between the data as a whole.

The data from the survey responses were transferred to a database for cleaning, coding, and analysis. Statistical software was used to identify frequencies. However, no statistical comparisons were made due to the low number of responses. Data from open-ended survey questions were analysed using the same methods applied to the consultation analysis of interview data.

Appendix B – Survey Results

Please note that percentages are provided in the tables below to aid interpretation; however, they should be treated with caution due to the limited number of survey respondents.

Table 1: Legal status of respondent's local authority (n=22)

Legal Status	N	%
Borough Council	11	50.0
London Borough Council	5	22.7
County Council	3	13.6
Unitary Authority	2	9.1
Metropolitan Borough Council	1	4.5

Table 2: Geographic region of respondent's local authority (n=21)

Region	N	%
City	8	38.1
Urban	7	33.3
Rural	3	14.3
Suburban	2	9.5
Not sure	1	4.8

Table 3: Approximate population of respondent's local authority (n=19)

Population	N	%
Greater than 500,000	4	21.1
300,001 – 500,000	3	15.8
Less than 300,000	10	52.7
Not sure	2	10.4

Table 4: Proportion of properties in respondent's local authority that are privately rented (n=17)

PRS properties	N	%
Greater than 80%	0	0
61% - 80%	0	0
41% - 60%	5	29.4
20% - 40%	7	41.2
Less than 20%	5	29.4

Table 5: Discretionary licensing scheme for PRS operating in respondent's local authority ('n' not known - question was 'tick all that apply')

Discretionary licensing	N	%
A selective licensing scheme	7	N/A
An additional licensing scheme	5	N/A
Not sure	5	N/A

Table 6: Size of enforcement team in respondent's local authority – number of people (FTE) (n=12)

Number of people in enforcement (FTE)	N	%
More than 20	1	8.3
10 to 20	4	33.3
Less than 10	4	41.7
Not sure	2	16.7

Table 7: Rogue landlord team or staff with dedicated time for the issue within the respondent's local authority (n=15)

Dedicated team for 'rogue' landlord issues	N	%
No	11	73.3
Yes	3	20.0
Not sure	1	6.7

Nature of criminality observed in local authority PRS

Table 8: Scale of criminal activity in the PRS in respondent's local authority (n=14)

Scale of criminal activity	N	%
A major/continuous problem	4	28.6
A moderate problem	7	50.0
An occasional/rare problem	3	21.4
Not a problem	0	0
Not sure	0	0

Table 9: Perception of trend in criminal activity in the PRS in respondent's local authority (n=14)

Perception of criminal activity	N	%
Increasing	11	78.6
Staying about the same	2	14.3
Decreasing	0	0
Not sure	1	7.1

Table 10: Presence of cases of organised crime in respondent's PRS area (n=14)

Perception of criminal activity	N	%
Yes	14	100
No	0	0
Not sure	0	0

Table 11: Proportion of all crime in respondent's PRS area estimated to be associated with organised crime (n=14)

Proportion of all crime that is 'organised'	N	%
Greater than 50%	0	0
31% – 50%	2	14.3
10% - 30%	3	21.5
Less than 10%	1	7.1
Not sure	8	57.1

Table 12: Extent of the problem of specific types of crime in respondent's PRS area

Crimes in the PRS	Major problem		Somewhat of a problem		No problem at all	
	N	%	N	%	N	%
Rent-to-rent scams (n=13)	3	23.1	9	69.2	1	7.7
Drug production and distribution (n=14)	1	7.1	12	85.7	1	7.1
Serious antisocial behaviour (n=14)	1	7.1	12	85.7	1	7.1
Money laundering (n=13)	1	7.7	11	84.6	1	7.7
Cuckooing (n=13)	1	7.7	10	76.9	2	15.4
Human trafficking or modern slavery (n=14)	0	0	14	100	0	0
Brothels and sexual exploitation (n=14)	0	0	12	85.7	2	14.3
Illegal money lending (n=13)	0	0	7	53.8	6	46.2

Table 13: Perception of ease of identifying organised criminal activity in the PRS (n=14)

Ease of identifying organised crime	N	%
Very difficult	1	7.1
Difficult	8	57.1
Neither easy nor difficult	5	35.7
Easy	0	0
Very easy	0	0

Table 14: How criminal activity in respondent's PRS area is typically identified

Crimes in the PRS	Often		Sometimes		Rarely		Never	
	N	%	N	%	N	%	N	%
Police referrals (n=14)	4	28.6	5	35.7	5	35.7	0	0
Complaints from neighbours / the community (n=14)	3	21.4	10	71.4	1	7.1	0	0
Complaints from tenants (n=14)	3	21.4	8	57.1	2	14.3	1	7.1
Identified from own proactive investigations (n=14)	3	21.4	7	50	3	21.4	1	7.1
Referrals from other organisations (n=13)	2	15.4	6	46.2	4	30.8	1	7.7
Complaints from landlords / managing agents (n=14)	1	7.1	3	21.4	7	50.0	3	21.4

Table 15: Level of agreement/disagreement with statements on investigating criminality in the PRS (n=12)

Investigating crimes in the PRS	Strongly agree or Agree		Neutral		Strongly disagree or Disagree	
	N	%	N	%	N	%
Our local authority staff need more training to investigate criminality in the PRS	9	75.0	3	25.0	0	0
Local authorities currently do not have adequate access to financial information of landlords	9	75.0	1	8.3	2	16.7
New legislation is required to address 'cuckooing' in PRS properties	8	66.7	3	25.0	1	8.3
The use of short-term renting (such as Airbnbs) is facilitating criminal activity in my Local authority area	6	50.0	5	41.7	1	8.3
Local authority investigatory powers are currently sufficient	4	33.3	4	33.3	4	33.3
The legal definition of a 'landlord' is clear	4	33.3	4	33.3	4	33.3
It is easy to identify who the landlord of a PRS property is	4	33.3	3	25.0	5	41.7
Local authority staff are familiar with the signs of criminality to look out for when visiting PRS properties	3	25.0	5	41.7	4	33.3
RIPA 2000 legislation is adequate for granting access to digital information	2	16.7	3	25.0	7	58.3
Land registry ownership changes are made promptly	0	0	0	0	12	100

Table 16: Other departments within the respondent's local authority (if any) that they work with to tackle criminality and organised crime in the PRS ('n' not known - question was 'tick all that apply')

Working with other departments within LA	N	%
Council Tax	9	N/A
Antisocial Behaviour Team	9	N/A
Planning	8	N/A
Adult Social Care/Children's Services	8	N/A
Legal	8	N/A
Environmental Crime (or similar department)	7	N/A
Building Control/Building Services	6	N/A
Other	2	N/A
None	0	N/A

Table 17: How often respondent collaborates with other agencies

Collaboration with other agencies	3 – Often		2 – Sometimes		1 – Never	
	N	%	N	%	N	%
Fire and Rescue Service (n=10)	5	50.0	4	40.0	1	10.0
Trading Standards (TS) (n=9)	4	44.4	5	55.6	0	0
Police/Regional Organised Crime Units (ROCUs) (n=9)	4	44.4	4	44.4	1	11.1
Home Office Immigration Enforcement (IE) (n=9)	1	11.1	7	77.8	1	11.1
Utility providers (n=9)	0	0	8	88.9	1	11.1
Companies House (n=9)	5	55.6	1	11.1	3	33.3
Department for Work and Pensions (DWP) (n=10)	0	0	6	60.0	4	40.0
National Crime Agency (NCA) (n=9)	2	22.2	3	33.3	4	44.4
HM Revenue & Customs (HMRC) (n=9)	1	11.1	3	33.3	5	55.6
Gang Masters and Labour Abuse Authority (GLAA) (n=9)	0	0	4	44.4	5	55.6
Illegal money lending Team (IMLT) (n=9)	1	11.1	2	22.2	6	66.7

Table 18: Perception of how effective collaboration is between respondent's LA and the other agencies (i.e. those listed above) (n=9)

How effective collaboration with other agencies is	N	%
Very effective	1	11.1
Effective	1	11.1
Somewhat effective	5	55.6
Not effective	2	22.2

Table 19: Level of agreement/disagreement with statements about sharing intelligence and data with other organisations for tackling criminality and organised crime in the PRS

Sharing intelligence and data	Strongly agree or Agree		Neutral		Strongly disagree or Disagree	
	N	%	N	%	N	%
We record intelligence and data relating to our PRS properties on all available systems (n=7)	3	42.9	1	14.3	3	42.9
Our local police service sends us data and intelligence routinely (n=9)	3	33.3	2	22.2	4	44.4
We share data and intelligence with Trading Standards through their national intelligence database (IDB) (n=9)	3	33.3	0	0	6	66.7
All our staff are aware where to record data and intelligence to share with other organisations in order to tackle criminality in the PRS (n=10)	3	30.0	2	20.0	5	50.0
We record all we are required to on the National Rogue Landlord database (n=9)	2	22.2	4	44.4	3	33.3
We share data and intelligence with our neighbouring authorities (n=9)	2	22.2	4	44.4	3	33.3
We have sufficient data and intelligence to allow us to act on criminality in our PRS (n=10)	2	20.0	2	20.0	6	60.0
We use local authority council tax data available to us under Schedule 237 of the Housing Act to tackle criminality in PRS properties (n=8)	1	12.5	5	62.5	2	25.0
The Data Protection Act makes it easy to share information and intelligence with other organisations (n=9)	1	11.1	3	33.3	5	55.6
We have a Memorandum of Understanding (MOU)/Data-Sharing Agreement (or similar) in place with other organisations to tackle criminality in the PRS	1	11.1	3	33.3	5	55.6

Table 20: Level of agreement/disagreement with statements about challenges encountered when trying to identify and tackle criminality in the respondent's PRS properties

Enforcement challenges	Strongly agree or Agree		Neutral		Strongly disagree or Disagree	
	N	%	N	%	N	%
Laws and regulations need updating to help us address criminality in the PRS (n=10)	8	80.0	1	10.0	1	10.0
We use all the powers available to us to disrupt criminality in our PRS properties (n=9)	5	55.6	1	11.1	3	33.3
We take action against criminal landlords as soon as they are identified (n=9)	4	44.4	1	11.1	4	44.4
We encounter very little criminality associated with letting agents compared to private individuals acting as landlords (n=9)	1	11.1	4	44.4	4	44.4
Our current level of powers is sufficient to deal with criminality in the PRS (n=10)	1	10.0	2	20.0	7	70.0

Table 21: Level of agreement/disagreement with suggested changes to help tackle criminality in the PRS (n=10)

Suggested changes	Strongly agree or Agree		Neutral		Strongly disagree or Disagree	
	N	%	N	%	N	%
Awareness should be raised to highlight the links between PRS properties and criminality with all those organisations who are also involved in tackling such criminality	9	90.0	1	10.0	0	0
Landlords should be required to be a business and legally treated as such	9	90.0	1	10.0	0	0
All police forces should have a central intel portal that all their local partners can access to add intelligence.	9	90.0	1	10.0	0	0
More research should be undertaken to explore how properties in the PRS facilitate crime and organised crime.	9	90.0	0	0	1	10.0
The licensing of properties should be extended to all those in the PRS	8	80.0	1	10.0	1	10.0
A landlord portal should be implemented which all landlords must sign up to and record their personal details	7	70.0	3	30.0	0	0

Appendix C – Main Crime Types Identified in PRS Properties

- Drug-related activities (growing, storing and distributing)
- Human trafficking
- Modern slavery
- Forced labour
- Operating brothels
- Sexual exploitation
- Antisocial behaviour
- Fraud and other financial crimes
- Illegal money lending
- Illegal subletting/rent-to-rent fraud
- Known criminal activities taking place on their premises
- Cuckooing
- Tenant exploitation
- Money laundering
- Financial exploitation
- Housing tenancy fraud
- Counterfeiting
- Illegal eviction
- Fraudulent/fake letting agencies
- Rental fraud
- Tax evasion
- Spiritual and ritualistic abuse
- Environmental crime (fly-tipping etc.)
- Handling stolen goods
- Sex for rent
- Black market rentals (off the books)
- Forgery and falsifying documents
- Identity theft
- Insurance fraud
- Protection rackets
- Arms trafficking
- Kidnap/murder involvement

About Perpetuity Research

Perpetuity Research is a leading research company with wide expertise in both quantitative and qualitative approaches. We have been extensively involved in studies relating to economic crime including the fraudsters' perspective, staff dishonesty, the links between fraud and organised crime, tackling fraud in the public sector, issues in respect of the reporting of fraud, and the police response to fraud. Our clients include businesses, national and local governments, associations and international organisations as well as charities and foundations. Our aim is to exceed their expectations, and it speaks volumes that so many have chosen to work with us repeatedly over many years. We are passionate about our work, and we would welcome the opportunity to work with you. For more information visit: www.perpetuityresearch.com

Director, Martin Gill, founded the Tackling Economic Crime Awards (TECAs); an award scheme that recognises and rewards individuals, teams, initiatives and companies involved in tackling different areas of economic crime operating in the public, private and not-for-profit sectors. For more information visit: <https://thetecas.com/>

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Doctor Janice Goldstraw-White

Janice is a criminologist who has worked with Perpetuity for over 15 years and leads on our Economic Crime research. She also organises our annual Tackling Economic Crime Awards, Thought Leadership Summit and is editor of our monthly *Security and Risk Thought Leadership* newsletter.

With more than 20 years' prior experience as an accountant, mainly in the public sector, she is particularly interested in crime in the workplace, fraudster behaviour and the role of women in white-collar crime. She has extensively researched around white-collar crime both here and in Australia, with a focus on offender accounts of criminal behaviour. She has particular experience in interviewing within prisons and has undertaken over 50 interviews with incarcerated white-collar offenders.

She has managed and delivered on a range of projects including research on tackling fraud in local authorities; whether the reporting of fraud in the UK should be compulsory; fraud in the Middle East; the problems of using digital evidence; improving the police response to victims of fraud; and partnership working to tackle fraud. Her research interests, however, are by no means confined to white-collar crime and other research includes why death rates for security officers from Covid are so high; security for data centres; the use of AI in security; and developing KPIs for the retail security sector. She is currently involved in research relating to data sharing to aid fraud investigations, and researching what organisations need to help them tackle business crime.

Janice's research skills cover the spectrum of qualitative research, including desk-based literature and policy reviews; analysis and mapping of practice and procedures; interviews with professionals and service users; and facilitating

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Janice has published a number of articles and co-authored separate chapters in books on workplace crime and the motives of white-collar criminals. Her own book entitled *White-Collar Crime: Accounts of Offending Behaviour* was published in October 2011.

Charlotte Howell

Charlotte Howell is a highly accomplished Research Manager, having delivered and overseen numerous research projects on crime and security-related topics over the past 15 years. Charlotte has conducted research on a wide range of criminological topics, including for example: acquisitive crime, business crime and fraud, financial investigation, and money laundering; the needs of victims of crime, including hate crime, domestic abuse and sexual violence. In addition, her research on security issues includes offender views on security measures, the skills of security officers and partnership working between the police and private security. Charlotte holds a first-class law degree and a master's in criminology.

Josephine Ramm

Josephine Ramm is an experienced social researcher specialising in crime, community safety, and public health. Josephine has extensive experience working with offenders and other potentially vulnerable populations, carrying out research in the fields of domestic abuse, sexual violence, suicide and suicide bereavement, and the links between domestic abuse and suicide.

Josephine co-authored the comprehensive report *More Than Just a Number: Improving the Police Response to Victims of Fraud* and contributed to work looking at the nature of organised crime in local communities. These studies identified the systemic challenges in addressing fraud and organised crime groups providing actionable recommendations to enhance support for victims and bolster investigative processes. Josephine holds a BSc in psychology from the University of Exeter and an MSc in health psychology from the University of Sussex and is also a qualified integrative counsellor.

Professor Martin Gill

Professor Martin Gill is a criminologist and Director of Perpetuity Research which started life as a spin-out company from the University of Leicester. He holds honorary/visiting Chairs at the Universities of Leicester and London. Martin has been actively involved in a range of studies relating to different aspects of business crime with a special emphasis on fraud and dishonesty offences. For example, much of his work has been involved with better understanding the fraudsters' perspective and he has interviewed a variety of different types of fraudsters, including dishonest staff, insurance fraudsters and identity fraudsters. He has published 15 books including the third edition of the *Handbook of Security* which was published in 2022. He is the organiser and Chair of the Security Thought Leadership webinar series. Martin is a Fellow of The Security Institute, a member of the Company of Security Professionals (and a Freeman of the City of London). He is a Trustee of the ASIS Foundation. In

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