

Tackling criminality and serious organised crime in the private rented sector

A toolkit for local housing authorities and their partners

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A: Introduction to criminality in the private rented sector

A1: The role of housing regulation and enforcement in tackling criminality in the private rented sector

Introduction

In accordance with their formal responsibilities, local housing authorities (LHAs) exercise their statutory powers to ensure safe and satisfactory conditions in the private rented sector (PRS). But the discharge of their duties can also play a crucial part in tackling crime that uses privately rented homes – such as human trafficking, drug production and financial fraud. Through proactive inspections, licensing schemes and stringent penalties for non-compliance, councils can disrupt criminal networks operating in rental properties, while also improving overall housing standards. This section sets out how statutory enforcement and the tackling of crime can work hand in hand.

For guidance on the specific legislative tools that can be used once criminal activity has been identified, see [Actions local authorities can take](#).

Reducing and eliminating criminality in the private rented sector

A core objective of regulation and enforcement should be to reduce and eliminate criminal activities in the PRS. This includes tackling unlawful housing practices such as illegal evictions, tenant exploitation and property mismanagement, through to more serious crimes which are not housing-specific and are often associated with criminal networks and organised crime groups (OCGs). LHA activities should include:

- Supporting rigorous law enforcement to deter criminal behaviour in the PRS
- Removing from the market landlords or agents who facilitate or engage in criminal behaviour within the sector
- Supporting the victims of crime and exploitation.

In so doing, LHAs and their partners can help improve living conditions and wellbeing in communities.

Changing the behaviour of offenders

Regulation and enforcement efforts should focus not only on ensuring that violations are penalised but also on changing the behaviour of non-compliant landlords. This includes:

- Encouraging landlords and property managers to act responsibly through regulatory compliance – or risk being found culpable as facilitators of crime by allowing their properties to be used for illegal purposes (such as cannabis farms, trafficking of people and cuckooing, while benefiting financially)

- Modifying behaviour through interventions that focus on a mix of education, guidance, penalties and rehabilitation, as appropriate
- Providing educational programmes that support and offer advice to landlords on their legal obligations, while also raising their awareness of what red flags to look out for to help them avoid becoming a victim of crime.

Changing attitudes toward offences

The extent to which privately rented housing is used to facilitate criminality is often underestimated – or not even recognised in some areas. Privately rented homes are frequently used to facilitate major crimes such as drug production, fraud, money laundering and human trafficking. Addressing housing-related issues helps to disrupt the day-to-day operation of major criminals and [OCGs](#). Maintaining standards in the PRS and having a robust enforcement strategy towards anyone facilitating criminality in it can play an important role in combating crime in general. Housing must be fully recognised as part of the overall approach to reducing neighbourhood crime. This can be done by:

- Addressing widespread but often minor offences, such as failure to carry out repairs or meet safety standards – thereby raising the importance that the public attaches to these kinds of misdemeanour and non-compliance
- Raising awareness of the broader impact of such offences on tenants and communities
- fostering a culture in which even small violations are taken seriously and viewed as unacceptable.

Conclusion

The objectives of regulation and enforcement in the PRS are diverse, yet interconnected. Each goal contributes to the overall wellbeing of tenants, landlords and communities. It is clear, however, that by addressing housing standards in a targeted way, working with partners and integrating housing within the overall approach, it is possible to disrupt, reduce or eliminate all levels and types of crime and to bring to book the individuals and groups who use the PRS as part of their criminal business model.

A2: Crime types associated with private rented sector properties

Introduction

The [PRS](#) is a vital part of the housing market, offering accommodation to a wide range of tenants. However, like any sector, it is not impervious to criminal activity and in reality plays host to crimes ranging from minor infractions to more serious criminal activities such as drug production (e.g. cannabis farms), human trafficking and sexual exploitation.

The PRS is particularly attractive to criminals and [OCGs](#), because it provides a looser regulatory environment, greater anonymity and more flexibility compared to other types of rental markets. In contrast, council housing and housing associations are far less favoured by criminals because of qualifying criteria (such as not having a criminal record), lengthy application processes, stricter oversight and greater accountability.

Furthermore, compared to the relative stability in other rental markets, the high turnover of tenants in the PRS allows OCGs to exploit short-term leases, quickly set up and abandon criminal operations and use multiple properties without drawing attention to their activities. Subletting scams and ghost tenancies are also common tactics that enable criminals to maintain control of properties, while at the same time shielding themselves from direct responsibility.

Local authorities play a vital role in identifying, preventing and responding to crime that takes place in these properties. This toolkit aims to provide an overview of the types of criminality commonly encountered in the PRS. In addition, further information is included in the toolkit for six crime types identified as the most prevalent within the PRS. For comprehensive guidance and insights on these issues, follow these links:

- [Illegal drugs and the private rented sector](#)
- [Modern slavery and human trafficking](#)
- [Sexual exploitation and brothels](#)
- [Rent-to-rent scams](#)
- [Housing fraud and financial exploitation](#)
- [Cuckooing](#)

Ensuring a clear and accurate understanding

Local authority housing enforcement officers are professionally well practised in identifying housing breaches such as safety hazards, overcrowding and licensing violations, but the increasing misuse of PRS properties for criminal purposes requires a broader investigative approach. Criminal activities such as drug production, human trafficking, sexual exploitation and fraud often take place together or alongside more familiar housing offences. This pattern of wider, interconnected offending makes it essential for officers to recognise the distinct signs of criminality in PRS properties.

This section of the toolkit provides guidance on differentiating between criminal offences and regulatory breaches, so that officers can accurately identify, document and escalate concerns appropriately. Understanding what constitutes a crime, [how to spot potential red flags](#) and when to involve enforcement agencies is key to tackling

serious illegal activity – while maintaining a focus on housing compliance and tenant safety. (For more detail, see [Actions local authorities can take](#).)

Definition of criminal activity

A criminal offence in housing involves a violation of laws that can lead to prosecution, fines or imprisonment. This usually includes intentional or reckless actions such as:

- Serious health and safety breaches – knowingly renting out properties that are unsafe and put tenants at risk
- Modern slavery and exploitation – using properties for human trafficking, forced labour or sexual exploitation
- Drug-related offences – allowing a property to be used for drug production (such as cannabis farms) or dealing
- Fraud – providing false information on tenancy agreements, illegal subletting and benefit fraud
- Illegal eviction – forcing a tenant out without following the correct legal procedures.

Definition of a scam

A scam in housing is a deceptive or fraudulent scheme designed to exploit tenants, landlords or authorities financially. Scams often involve misrepresentation, dishonesty or illegal practices to obtain money or property unfairly. All scams are unethical, but not all are criminal – it depends on whether they involve intentional deception, fraud or illegal activity, rather than just a breach of housing regulations. Some scams may fall under civil law if they involve contractual breaches or regulatory violations, as opposed to outright fraud or deception. Examples include:

- A landlord charging unlawful fees (e.g. administration fees banned under the Tenant Fees Act 2019) – this is a breach but not necessarily criminal
- A managing/letting agent failing to return a deposit on time – this may lead to a financial penalty but not criminal prosecution.

A scam becomes criminal when it involves fraud, deception or deliberate wrongdoing that violates the law. Examples include:

- Fake rental listings – advertising a non-existent property and taking deposits is fraud
- Benefit fraud – providing false information for financial gain is a criminal offence
- Illegal evictions for profit – forcing tenants out unlawfully for financial gain can lead to prosecution
- Rent-to-rent scams – subletting a property without permission and overcrowding it for profit could involve fraud and other criminal offences.

Organised crime in the private rented sector

During visits to PRS properties, officers may encounter criminal activity linked to [OCGs](#) whose operations extend beyond individual properties and often involve exploitation,

fraud and other serious offences. Organised crime refers to serious, coordinated criminal activity carried out by structured groups that operate for financial gain, often spanning multiple locations and even crossing national borders.

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.¹ Section 45 of the Serious Crime Act 2015 reinforces the point that organised crime includes activities involving financial gain through illegal housing practices – which makes landlords, managing/letting agents and networks knowingly engaging in these acts liable for prosecution.²

OCGs engage in a range of illegal enterprises, many of which rely on PRS properties as bases of operation. Unlike isolated criminal acts, organised crime is systematic, well planned and often involves multiple individuals playing different roles, including as recruiters, facilitators, exploiters, enforcers and money launderers.

Importantly, not everyone encountered in these situations will be a perpetrator – many will be victims of exploitation (such as trafficked people forced into labour or sex work) or vulnerable tenants coerced into subletting for criminal purposes or cuckooed in their own home. Where they come across them in PRS properties, officers should carefully assess situations like this to identify any signs of coercion, control and vulnerability, rather than assuming that everyone present is complicit in illegal activity.

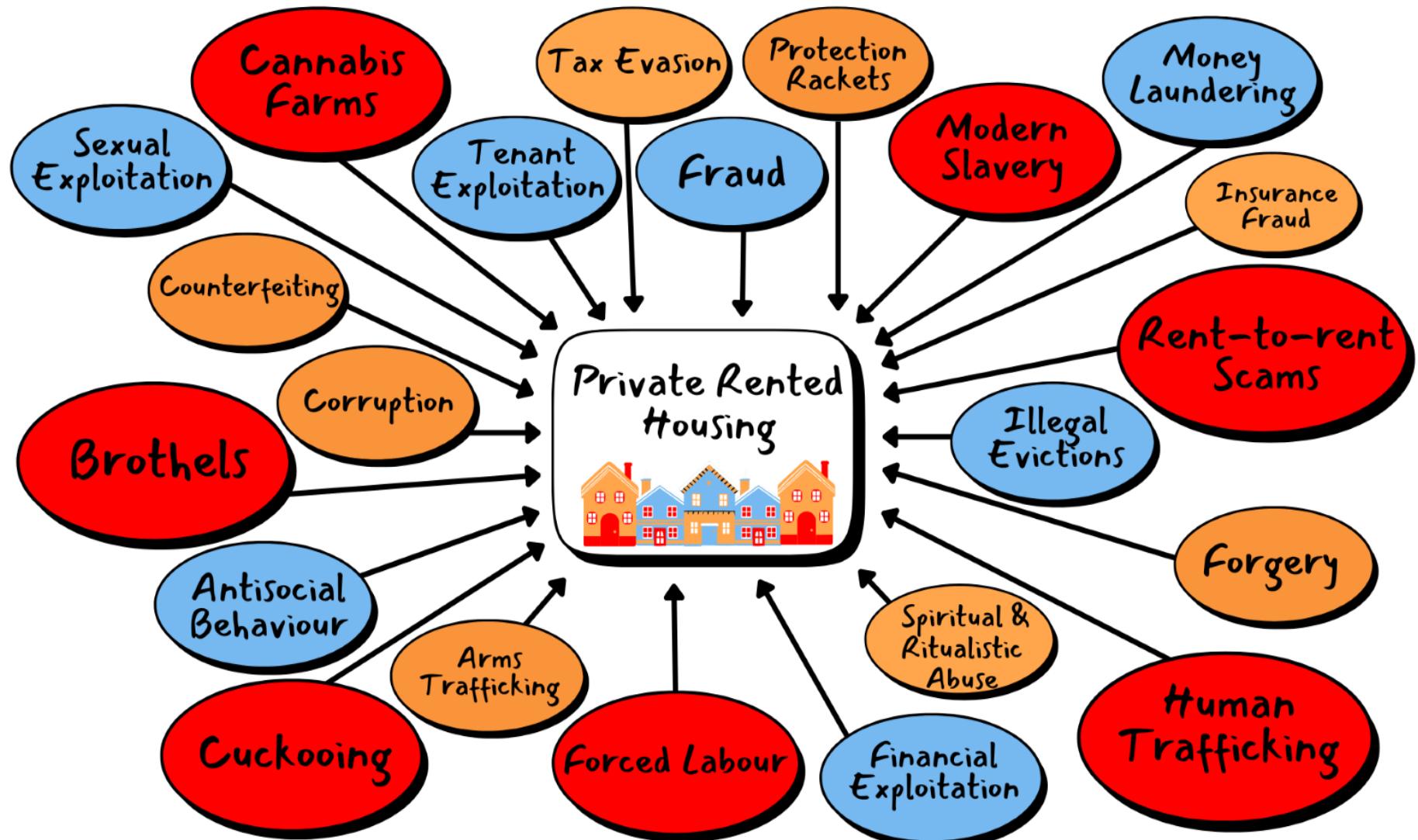
Because OCGs operate across multiple locations, criminal activity in one property is rarely an isolated issue. It may be linked to wider networks, spanning multiple local authorities, national jurisdictions and even international borders. Addressing these threats requires collaboration between housing enforcement teams, police and other government agencies, including Immigration Enforcement (IE), modern slavery units, Trading Standards and financial crime investigators. Recognising the patterns and warning signs of organised crime is crucial for ensuring the correct response, for safeguarding potential victims and for effectively disrupting criminal operations.

Figure 1 sets out the different types of criminality commonly found in, or associated with, PRS properties or their landlords. A glossary appended to the toolkit provides further details and definitions.

¹ This definition comes from the National Crime Agency and the Home Office – [serious and organised crime](#)

² [Section 45, Serious Crime Act 2015](#)

Figure 1 – Crime types associated with PRS properties



- Drug-related activities (growing, storing and distributing)
- Human trafficking
- Modern slavery
- Forced labour
- Operating brothels
- Sexual exploitation
- Anti-social 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 (e.g. fly-tipping)
- 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

B: Awareness-raising and training in criminality

B1: Training for officers to identify criminality during property visits

Beyond the core responsibility of ensuring property safety and compliance with housing standards, PRS housing enforcement teams are increasingly faced with the task of identifying and addressing crime being committed in properties within the sector. This includes activities such as drug cultivation, human trafficking, sexual exploitation, modern slavery, frauds and financial exploitation, and cuckooing. To tackle these complex challenges effectively, comprehensive and specialised training is essential. As well as giving them the knowledge to enforce housing safety regulations effectively, this training equips enforcement officers with the skills to recognise signs of criminal behaviour and to collaborate with other relevant agencies in order to take swift and lawful action to protect tenants and communities.

This toolkit highlights some of the important areas where officers may need training to support these dual responsibilities, ensuring that PRS enforcement teams are properly prepared to combat criminality while still being in a position to continue discharging their core housing enforcement duties.

Legislative and regulatory training

- Establishing the identity of the person in ‘control’ and ‘managing’ the property – in a context where criminals use elaborate means to avoid being connected to properties and crimes associated with them. Such means include complex companies and structures to obscure responsibility and thwart enforcement action. For further detail on this, see: [*Identifying who is liable in cases of criminality in the PRS*](#)
- [The Proceeds of Crime Act 2002](#) (POCA) – a powerful tool to disrupt OCGs and to secure ill-gotten money for local public use
- Police and Criminal Evidence Act 1984 (PACE) – to ensure evidence is gathered and presented in a lawful way
- The role of Companies House.

Operational management

- [Working with partners](#)
- [The work of Trading Standards](#)
- Working with the police and other government agencies
- [Information sharing](#)
- [Data protection and confidentiality](#).

Investigation and enforcement skills

- [Working with utility providers](#)
- Regulation of Investigatory Powers Act 2000 (RIPA)
- Surveillance techniques and covert operations – to ensure that evidence gathered is legal, admissible in court and compliant with RIPA.

Criminality and organised crime in PRS properties

- [Understanding criminal behaviour and organised crime networks](#)
- [Collaborating with the police and others to tackle criminality](#)
- [Recognising signs of criminality relating to PRS properties](#)
- [Sexual exploitation and brothels in PRS properties](#)
- [Modern slavery and human trafficking in PRS properties](#)
- Recognising the [signs of ritualistic and spiritualistic abuse](#) – in some localities this can account for 20% of human trafficking victims; belief systems are used to exploit and control victims
- County lines operations
- Counter-terrorism (including misuse of household chemicals, suspicious items in properties and recognising extremism)
- [Tackling cannabis cultivation and drug distribution](#) in PRS properties
- [Energy supply and theft in residential properties](#)
- [Money laundering and the PRS](#)
- [Illegal money lending and the PRS](#)
- [Rent-to-rent scams and illegal subletting](#)
- Recognising and tackling [cuckooing](#)
- Criminality in empty properties.

B2: Guidance on how to identify the red flags that could indicate criminality

When making visits to [PRS](#) properties, housing enforcement officers and other local authority staff and partners should be vigilant for signs of criminality or exploitation. While a single red flag may not be proof of criminality, it should prompt further investigation. Multiple red flags should prompt urgent investigation.

This guide provides a structured overview of some general key warning signs that officers should look for when they visit PRS properties.

Crime-specific red flags can also be found in:

External property indicators

- **Anti-social behaviour** connected with the property can be an indicator of it being used to facilitate criminality
- **Vehicles frequently arriving and leaving quickly**, particularly at night
- **Strange noises**, such as constant machinery running or humming, or drilling at odd hours
- **Large amounts of packaging materials or postal deliveries**, especially of electronics or chemicals
- **Unusually high levels of rubbish**, particularly food packaging and chemical containers, or black bin bags piling up outside.

Property condition and set-up

- **General disrepair** of the property can be an indication that it is being used to facilitate criminality
- **Excessive security measures** – CCTV inside, reinforced doors or multiple locks on internal rooms
- **Windows covered** with blackout curtains, boards or excessive blinds – potentially hiding illegal activity
- **Strong chemical odours** (e.g. cannabis, solvents and ammonia) indicating drug production or other illicit activities
- **Unusual ventilation systems** – excessive extractor fans or modified ducting, suggesting a cannabis farm or drug laboratory
- **Tampered-with electricity meters**, exposed wiring or signs of illegal bypassing
- **Excessive condensation or mould** – especially on walls and ceilings – could indicate overcrowding or drug cultivation
- **Parts of the property are not accessible** to occupiers, indicating restriction on living conditions
- **Keys kept in their doors** suggesting unusual living arrangements such as changing occupants, constant comings-and-goings and the occupants lacking control over the property.

Occupant behaviour and patterns

- **Reluctance to allow access** – tenants delaying, refusing entry or insisting on specific appointment times, but then failing to attend
- **Frequent comings-and-goings**, especially at odd hours – possible sign of drug dealing or exploitation
- **A lot of people living in cramped conditions**, particularly if mattresses or makeshift beds are found in unexpected places
- **Occupants avoiding interaction** – tenants appear nervous, avoid answering questions or defer to someone else to speak
- **People present who are not on the tenancy agreement** – suggesting subletting, exploitation or human trafficking
- **Very few personal belongings** suggesting temporary occupation, forced labour or people being moved frequently
- **Lack of personal ID documentation** and/or lack of access to money among occupants.

Indicators of exploitation and human trafficking

- **Locks on internal doors**, restricting movement inside the property
- **A lot of people being transported to and from the property**, particularly in groups, especially early in the morning or late at night
- **Rooms set up as workspaces** rather than living spaces – signs of forced labour
- **Occupants unable to communicate properly** – may not speak English or appear confused about their location
- **Signs of ritualistic or spiritual abuse**, such as objects/instruments, bloodstains and unusual markings/clothing
- **Signs of malnutrition or fear among occupants** – indicating coercion
- **Signs of physical abuse/injury** – including ‘branding’, tattoos, bruises and scars
- **Lack of suitable clothing** – dishevelled, ill-fitting or unsuitable for their work.

Financial and rental irregularities

- **Cash-only rent or council tax payments**, especially if in large sums
- **Rent paid by an unknown third party**, rather than by the tenants themselves
- **Tenants reluctant to provide ID or employment details**, possibly using false identities
- **Same person renting multiple properties**, often using different names
- **No official tenancy agreement** – or documentation that seems inconsistent.

C: Crime types prevalent in the private rented sector

C1: Illegal drugs and the private rented sector

In summary

- [PRS](#) properties are frequently used for drug production – in particular for cannabis cultivation, where ‘farms’ are established
- These farms can be set up in a single room, garage or even across the entire property
- Many cannabis farms are controlled by [OCGs](#) which often install ‘farmers’ to tend to the plants – individuals who may themselves be victims of exploitation and human trafficking
- Cannabis farms pose substantial fire risks and cause extensive damage to properties
- Although criminals attempt to conceal their activities, there may be numerous external and internal signs that indicate the presence of cannabis cultivation
- Addressing this type of criminality requires a multi-agency approach (which may extend to utility providers) to detect and mitigate illegal activities.

In detail

The misuse of PRS properties for drug production – particularly cannabis cultivation – poses significant and far-reaching risks. Beyond the immediate consequences of financial and structural damage for landlords, these operations are increasingly linked to OCGs involved in brutal and exploitative criminal activities. (See [Crime types associated with private rented sector properties](#) for further detail.)

While often perceived as a relatively low-level crime, cannabis farming is deeply entwined with larger, more insidious criminal networks. A report by Crimestoppers reveals that 94% of cannabis farms are in domestic homes – an estimated 90% of cannabis consumed in the UK originates from small-scale residential farms.³ These set-ups are favoured by growers because they are low-risk, easy to conceal and scalable. By spreading operations across multiple rented properties, growers – often connected to OCGs – mitigate financial losses if any single site is discovered.

Many cannabis farms are controlled by OCGs that exploit vulnerable individuals to sustain their operations. ‘Farmers’, who tend to the plants, may be coerced or trafficked into the role under threats of violence or financial duress. These victims are often isolated and forced to live in squalid conditions, a practice that is consistent with patterns of modern slavery and human trafficking. Such criminal networks frequently overlap with those involved in other, similarly egregious crimes, including international [people trafficking](#) and [sexual exploitation](#).

In some cases, criminal groups employ a tactic known as [cuckooing](#), where vulnerable tenants – often struggling with addiction or financial difficulties – are coerced into allowing their homes to be used for cultivation. This not only puts these individuals at

³ See Crimestoppers website on [cannabis cultivation](#)

risk but also further entrenches the criminal network's grip on communities. The effects ripple outward, contributing to anti-social behaviour, fly-tipping and environmental damage, all of which degrade neighbourhoods and strain community resources.

Regardless of scale, cannabis farms constitute a significant fire risk. Makeshift electrical set-ups, bypassed meters and structural modifications increase the likelihood of fires, which can devastate the property and endanger neighbouring homes. Older properties without adequate firebreaks – meaning that any fires can easily spread through terraces – are particularly vulnerable. For landlords, the aftermath includes extensive repairs, significant financial costs and delays in restoring the property to rentable condition.

In some instances, OCGs exploit corrupt [managing/letting agents](#) to secure properties for their illegal operations, further complicating detection and enforcement. This layer of complicity is indicative of the sophistication and adaptability that characterises the operations of these networks.

'Cannabis farm' is now a widely recognised term, but the broader societal and criminal implications of these operations are often overlooked. They are far from victimless crimes, enmeshed as they are in networks that perpetuate exploitation, environmental harm and violence. Public awareness, robust landlord vigilance and proactive community engagement are crucial in addressing this pervasive issue.

Once cannabis farming is recognised as a serious gateway to organised crime, it becomes evident that coordinated efforts are needed to combat its prevalence and to mitigate its impact on individuals, properties and communities.

How landlords are involved or can be implicated in the offence

Landlords may be unaware of illegal activities going on in their properties, as tenants and OCGs often go to great lengths to conceal their operations. These tactics may include tenants securing and taking possession of the property under false pretences, falsifying rental applications and avoiding direct contact with landlords. In many cases, OCGs may use 'front' tenants or recruit individuals willingly or unwillingly (often through trafficking) to cultivate cannabis. If trafficked, these farmers may be locked in properties, with food delivered, no means of escape and no paperwork to prove who they are. Some criminal groups even involve managing/letting agents in their schemes. Sometimes agents are aware of their own involvement; sometimes they are not. All this can occur without the knowledge of the property owner.

Figure 2 – Living conditions for cannabis farmers

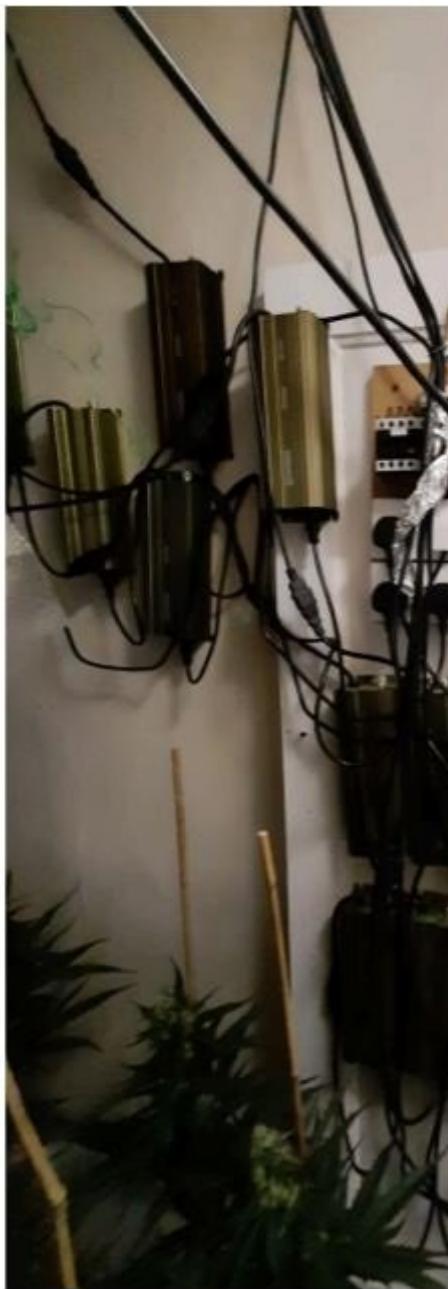


(Photograph by Leeds City Council)

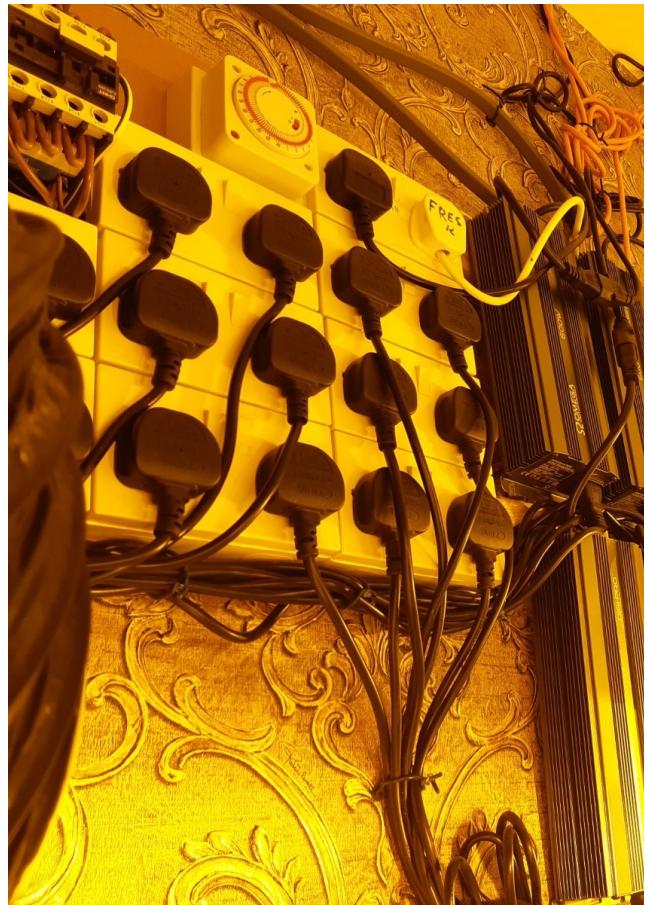
As a result, landlords face significant risks if their property is used for illegal cannabis cultivation. They may encounter legal repercussions, including potential property seizure and implication in criminal activity, depending on their involvement/negligence. Financially, landlords can incur costly property repairs as a result of cultivation operations. They can also be exposed to legal expenses, loss of rental income and harm to their reputation. Furthermore, insurance policies often exclude cover for damage that relates to illegal activities. This leaves landlords to shoulder the full financial burden of repairs and restoration – and explains why insurance fraud committed by landlords has been on the rise.⁴

⁴ See *Insurance Times*, '[Cannabis: a growing insurance problem](#)', 23 January 2023

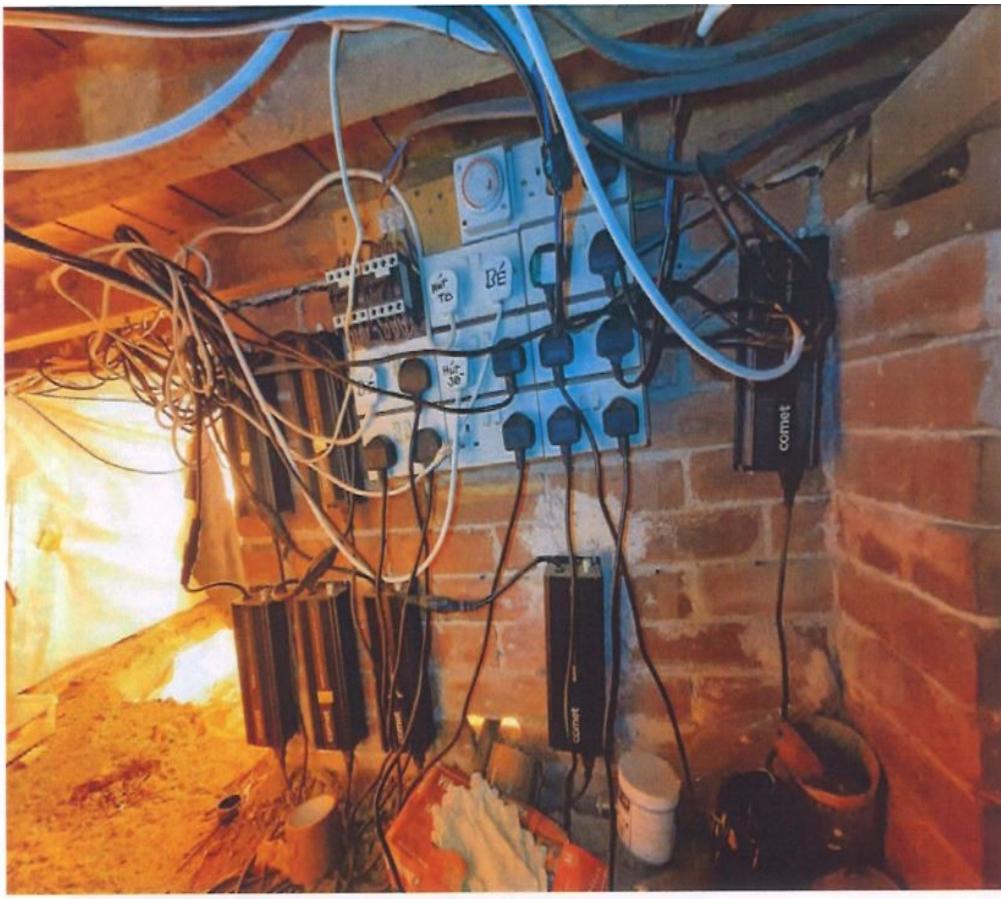
Figure 3 – Altered and unsafe electrics



(Photograph by Leeds City Council)



(Photograph by Leeds City Council)



(Photograph by Leeds City Council)

Landlords may be actively involved or complicit in illegal activities that go on in their properties. This could be:

- Directly by facilitation of the operations, accepting higher rents to ignore illegal activity
- By being involved in the operation and receiving some of the profits or
- By being indirectly complicit through neglect of their landlord responsibilities.

Neglect in this context may include not undertaking the relevant pre-tenancy checks, failing to undertake inspections or ignoring signs of potential illegal activity. This might lead to civil claims, financial penalties or loss of property under certain circumstances.

Impact of illegal drugs in private rented sector properties

The use of drugs like cannabis in PRS properties can have far-reaching effects on landlords, neighbours and the wider community. Cannabis cultivation or use in PRS homes may lead to property damage, mould from high humidity and fire hazards from tampered-with electricity supply – burdening landlords with costly repairs. For neighbours, the associated odours, increased foot traffic and potential anti-social behaviour disrupt local harmony. Communities may experience a decline in safety and property values, while criminal links to large-scale cannabis operations often fund

organised crime, all of which can produce a violent environment and further illegal activity.

Red flags: what to look out for

The incidence of cannabis farms is increasing in residential properties. Generally, criminals favour houses over flats and low-traffic areas such as cul-de-sacs, where there is less chance of detection. The scale of these farms can vary significantly, ranging from small set-ups to large, sophisticated operations. Identifying illegal cannabis cultivation in rental properties can be challenging, because criminals work hard at concealing their activities and at avoiding detection.

External property indicators

Cannabis farms create a lot of heat and moisture – so things to look out for include:

- Condensation on windows or visible mould
- Ventilation ducts that are generally larger than the ones used to vent clothes dryers and can sometimes be seen coming out of windows and roof spaces
- Humming or buzzing sounds which may come from fans or hydroponics systems
- Blocked letterboxes
- Heavy use of anti-odour devices
- Blocked chimneys – as part of ventilation control growers may block chimneys, something that may be visible from outside
- Pungent smells – particularly around vents, windows and chimneys
- Powerful lighting, day and night
- Items left outside, such as bags of soil, packaging from gardening supplies, fertiliser, reflective materials, lights and discarded plant material
- Blacked-out, silver-taped or otherwise occluded windows
- Snow melting unusually quickly on the roof in winter and birds gathering on the roof because the property is warmer than others in the street.

Internal property signs

- Damp, mould and general water damage
- Tampered-with electrical systems – damage near power outlets, changes to wiring, exposed wiring, burn marks and bypassed meters
- Excessive fortification like additional internal locks or blocked doors
- Walls, ceilings or floors removed
- Plastic sheeting or reflective materials used to line walls or ceilings to enhance light distribution.

Tenant behaviour

- Offering to pay rent for months in advance
- Offers to pay above market rates in exchange for privacy
- Preference for cash payments (both rent and council tax)
- An unusual amount of activity when the tenants move in
- A lot of visitors day and night or conversely a lack of regular daily activity

- Anti-social behaviour connected to the property
- Paranoid behaviour
- Prevention of inspection
- Unusually high utility bills (if landlord is responsible for paying).

Response to the issue

Local authority housing enforcement teams have a significant role to play in responding to cannabis farms in the PRS: ensuring properties meet safety standards, safeguarding vulnerable tenants and collaborating with other agencies to disrupt criminal activity. Their response involves a combination of housing regulation enforcement, working with landlords and coordinating with police.

1 Legal enforcement action

- **Local authority housing enforcement powers**
 - If the property is in disrepair or does not meet the required safety standards, the housing enforcement team can issue improvement notices under the Housing Act 2004, requiring the landlord to fix the issues
 - If the property poses an immediate risk, the local authority can take action under the [Housing Health and Safety Rating System](#) (HHSRS) to ensure the property is made safe or closed
 - In severe cases, the local authority may use emergency prohibition orders, preventing the use of the property until the hazards are resolved.
- **Licensing schemes**
 - Local authorities have several licensing options to regulate the PRS and address issues such as poor property conditions, anti-social behaviour and criminal activity, including brothels. [Selective licensing](#) applies to all private rented properties in a designated area where the council identifies significant problems, such as low housing demand or high levels of crime
 - [Additional licensing](#) targets [houses in multiple occupation](#) (HMOs) not covered by mandatory HMO licensing, ensuring better management standards. Discretionary licensing allows councils to introduce tailored schemes to tackle specific local issues, helping improve housing conditions and tenant safety.

2 Engagement with landlords

- **Landlord education and collaboration**
 - The housing enforcement team can work with private landlords and managing/letting agents to help them identify signs of cannabis farming and activities related to drug distribution. This can include information campaigns, using clear and accessible materials (brochures, emails and posters) detailing the risks of cannabis grows and drug-related activity on rental properties
 - Workshops, webinars and training for landlords and managing/letting agents – including case studies and lessons learned – can be useful vehicles for explaining their responsibilities and how they can spot potential red flags of drugs production and distribution.

- **Legal advice to landlords**

- Where criminal activity is confirmed, the team may advise landlords on pursuing legal action to recover possession of the property, such as initiating an eviction process under the Anti-social Behaviour, Crime and Policing Act 2014 (via mandatory ground for possession), if there is evidence of drug-related crime or anti-social behaviour.

Partners to work with

Local authority housing enforcement teams can collaborate with a wide range of organisations and agencies to address drug-related criminal activities in the PRS. Partnering with these stakeholders enhances resource sharing, enforcement effectiveness and community protection. Key organisations and agencies include:

1 Law enforcement

Local authorities can work closely with police forces to detect and disrupt cannabis cultivation and the production and distribution of other drugs, especially where this is linked to county lines operations or wider organised criminal networks. The nature and level of the problem will probably dictate whether to work with the local police force or with any relevant specialist unit – such as drug units (if available in the area), regional organised crime units (ROCUs), county line task forces, the National Crime Agency (NCA) and even Immigration Compliance and Enforcement (ICE).

Collaboration between police and local authorities can be highly effective. Local authorities often have property and tenant data that the police lack. This data frequently fills in intelligence gaps to facilitate targeted interventions. Joint efforts might include local authority staff joining police raids or police accompanying inspections where drug activity is suspected. Additionally, they can partner on initiatives like [Operation Milieu](#), which targeted organised crime by dismantling large-scale cannabis operations.

2 Utility companies

Utility companies play a vital role in detecting cannabis farms, primarily by monitoring abnormal energy and water usage. They regularly identify significant spikes in consumption or tampered-with supplies that signal potential illegal activity, and report these to the authorities. Joint investigations involving housing officers and utility inspectors help uncover meter bypassing, a common practice in cannabis farms that not only facilitates theft but also creates a serious fire risk. In addition, a lack of council tax payments or unoccupied properties with high energy usage can be an indicator of cannabis grows.

3 Fire and rescue services

Cannabis cultivation creates hazardous conditions, including overloaded electrical circuits and water damage, which increase fire risks. To address these dangers, local authorities should collaborate with fire services to conduct risk assessments, where fire officers evaluate properties for hazards linked to cultivation set-ups.

Additionally, housing teams should enforce safety regulations, ensuring landlords resolve issues such as electrical faults and structural damage in compliance with health and safety laws.

4 **Landlords and landlord associations**

Landlords and landlord associations are frontline partners in preventing cannabis farms. Local authorities should educate landlords by training them to spot the signs of cannabis farms and, using the Housing Act 1988, section 8, help landlords evict tenants engaged in illegal activities.

5 **Other agencies** councils can work with include:

- The local authority's environmental health team
- Community safety partnerships (CSPs)
- Neighbourhood Watch schemes
- Local drug and alcohol services
- Immigration Enforcement
- Gang and exploitation support services – such as the Gangmasters & Labour Abuse Authority (GLAA)
- Modern slavery and human trafficking support agencies
- Royal Mail.

By collaborating with these other organisations, local authorities can create a multi-agency approach that strengthens enforcement and reduces the harm caused by drug-related activities in PRS housing.

Prevention

Landlords and managing/letting agents in the PRS should be supported and encouraged to comply with their legal obligations on property management and be engaged to act as the primary defence against the threat of cannabis production in their properties. Local authorities should consider running awareness campaigns to help make sure landlords are equipped with the information they need to spot the signs of illegal drug production and distribution.

Landlords and managing/letting agents should look out for:

- Poor references or a lack of references from prospective tenants
- Offers to pay rent for several months in advance, or large deposits
- Preference to pay rent in cash
- Requests to keep utility bills in the landlord's name
- Requests for total privacy – requesting no periodic inspections or actually preventing inspection.

Landlords should:

- Carry out right-to-rent checks
- Insist on photographic identification

- Ensure references are taken from previous landlords and employers
- Ask for recent payslips or bank statements
- Carry out regular inspections of the property
- Take mobile phone numbers for all tenants
- Communicate with neighbours regularly
- Get paid via bank transfer/[BACS](#)
- Ensure that their landlord insurance policy provides cover for malicious acts.

Landlords should not:

- Accept cash for rent, deposit or administration fees
- Offer short-term lets
- Allow the property to become screened from the street.

Community buy-in

General awareness programmes should target local communities to highlight the risks and harms associated with cannabis grows. Campaigns should highlight how:

- There are often links to gangs and serious [OCGs](#)
- Cannabis farms frequently have links to trafficking and modern slavery
- Cannabis grows can increase the risk of violence and anti-social behaviour in the neighbourhood
- Local children and vulnerable adults may be recruited to commit crimes by people involved in drug production
- Drug-related activity can bring dangerous weapons to neighbourhoods
- Properties (and neighbouring properties) that are involved are at risk of significant damage, including risk of fire because of illegal alterations and damage caused to electrics
- Drug-related activity can increase the insurance premiums neighbours have to pay
- Drug-related activity can reduce local house values.

Sources of information

Stages of a cannabis grow and what to look out for

Cannabis grows can occur relatively quickly. Plants need between 8 – 12 weeks on average to grow to maturity. The growth rate depends on the systems used and the experience of the growers. A single plant can net between £800 – £1,200. Cannabis plants have four main growth stages: germination, seedling, vegetative and flowering. The plants require specific nutrients, environments and growing mediums at the different stages in order to achieve the maximum yield. The following will help in spotting the different stages of growth:

- **Germination:** plants require moisture, warmth and darkness over this period, which lasts from 3 – 8 days. Seeds may be placed between wet paper towels or peat moss. Germinated seeds require a light soil – look out for packaging such as soil with perlite

- **Seedling:** the seedlings need warmth, humidity and light. This period lasts from 4 – 8 weeks. Some growers may test and adjust the pH level of the water they use on seedlings. This may be achieved by letting water stand, so look out for containers used for this purpose. The high humidity required during this stage may be observed in condensation on windows
- **Vegetative state:** lasts 4 – 6 weeks, although growers can inhibit flowering by manipulating light levels, keeping the plants lit for 18 – 20 hours a day. Keeping the plant in the vegetative state for longer can produce larger yields. During this time, fertilisers containing nitrogen, phosphorus and potassium are commonly added, so look out for packaging for these chemicals at the property. Again, continuing high humidity may result in steamy windows
- **Flowering stage:** after 8 – 12 weeks the plants flower. Plants shed unneeded leaves, which may need removing – look out for bin bags or visible plant waste. During flowering, growers keep the humidity low to prevent mould, so air vents may be visible at the property.

Figure 4 – Cannabis grow rooms



(Photographs by Leeds City Council)

Other sources that may be useful:

- Crimestoppers – [cannabis cultivation signs for a general audience and managing/letting agents](#)

- Landlords' portal – [information for landlords about the threat of cannabis farming in rented properties](#)
- National Residential Landlords Association – [advice for landlords about avoiding a cannabis farm in your property](#)
- Insurance advice for landlords from [Direct Line](#) and [Total Landlord Insurance](#)
- West Yorkshire Police – [How to spot a cannabis farm](#)
- Operation Scorpion – [Phase 5](#) – regional initiative across the south-west, including a specific focus on targeting cannabis cultivation and modern slavery run by OCGs
- Home Office guidance: [Drug licensing factsheet: cannabis, CBD and other cannabinoids](#)

Legal framework

UK laws on illegal drug cultivation/production use a combination of drug control, financial crime, property regulation and energy theft to prosecute people running cannabis farms.

1 Misuse of Drugs Act 1971

Depending on the scale, a conviction can result in up to 14 years in prison and unlimited financial penalties – or both.

- **Class B drug:** cannabis is classified as a Class B drug under the Misuse of Drugs Act 1971. Possession, production and supply of Class B drugs are criminal offences in the UK
- **Production and cultivation:** section 4 makes it illegal to produce or cultivate cannabis plants. Cultivation is often penalised with harsh sentences, especially if there is evidence of commercial intent
- **Possession with intent to supply:** section 5 criminalises possession with intent to supply. If a large number of plants or an organised set-up indicates distribution, the offender may face more severe penalties for supply rather than just personal use
- **Section 6:** this specifically makes it illegal to cultivate cannabis plants without a proper licence. Even small-scale cultivation could be prosecuted under this provision.

2 Proceeds of Crime Act 2002 (POCA)

POCA enables authorities to seize assets gained through criminal activities, including cannabis cultivation. Landlords unknowingly harbouring cannabis farms may need to demonstrate that rent payments were not derived from illegal proceeds to avoid confiscation. It covers:

- **Confiscation orders:** POCA allows the courts to confiscate profits or assets gained through illegal activities, including cannabis farming
- **Money laundering (Part 7):** people who invest in cannabis farms or benefit from the proceeds may also face prosecution for money laundering under this legislation.

3 Serious Crime Act 2007

The Serious Crime Act makes provision for targeting people who knowingly help or facilitate others in running or setting up cannabis farms, even if they are not directly involved in the cultivation. For instance, someone renting out a property knowing it will be used for a cannabis farm could be prosecuted. The Act also enables law enforcement to impose harsher sentences if the farm is part of organised criminal activities.

4 The Psychoactive Substances Act 2016

Custodial sentencing can be for up to seven years, particularly if cannabis is sold or distributed under the guise of 'legal highs' or synthetic alternatives. The Psychoactive Substances Act has a primary focus on synthetic drugs, but it complements other drug laws by providing a framework for prosecuting people involved in cultivating, producing or distributing substances that alter mental states.

5 Landlord and Tenant Act 1985

Landlords are responsible for ensuring properties are kept in safe condition. Cannabis farms can create fire hazards as a direct result of tampered-with electrical systems – which makes intervention legally necessary under health and safety standards. Financial penalties or loss of property may be applied to landlords knowingly allowing cannabis cultivation on their premises. If a landlord is aware that their property is being used as a cannabis farm and fails to act, they could be prosecuted or have financial penalties imposed on them for allowing illegal activity on their property.

6 Electricity Act 1989 (section 13)

Cannabis farms often involve electricity theft. Tampering with the electrical supply and bypassing electrical meters are criminal offences under section 13. Energy companies and police can collaborate to address these breaches. Sentencing includes financial penalties, imprisonment (up to five years) or both, in addition to charges under the Misuse of Drugs Act if related to cannabis cultivation.

7 Housing Act 1988

Under section 8, landlords can issue eviction notices for criminal behaviour, including illegal drug production, which breaches tenancy agreements. Courts often grant possession orders in such cases.

8 Health and Safety at Work Act 1974

If cannabis cultivation damages the property's electrical systems or causes fire hazards, landlords and local authorities have duties to mitigate risks to occupants and neighbouring properties under this legislation.

Legal cases

Below are some key English legal cases involving the cultivation or distribution of cannabis from PRS properties.

R v Banks (2023)

Yoko Banks, a landlord from Harrogate, rented three properties to an [OCG](#) that used them as large-scale cannabis farms. Banks was paid £12,000 a month in rent as part of the operation, which generated £345,000 in illicit profits. The court found her guilty of being concerned with the supply of cannabis. She was sentenced to three-and-a-half years in prison and ordered to repay £142,000 under POCA. This case highlights the legal risks landlords face when properties are used for illegal purposes, emphasising the need for thorough tenant screening and regular property inspections.

R v Taylor (2019)

The landlord was prosecuted for allowing their property to be used as a cannabis farm. The tenant, who rented the property, turned it into a large-scale illegal cultivation site. The landlord was charged with facilitating the operation of cannabis farms by renting properties to known criminals and failing to ensure proper checks were undertaken on the tenant. The court found that Taylor had been aware of suspicious activity, including bypassed electricity meters and altered property layouts, yet had failed to report it. The case highlights the growing issue of landlords unknowingly or negligently allowing cannabis farms to be established in their properties. It serves as a reminder of the importance of tenant vetting, regular inspections and monitoring for unusual signs that are a common feature of cannabis cultivation operations.

R v Williams (2023)

The case involved an individual who was implicated in operating a major cannabis cultivation operation across several residential properties in the UK. It highlighted the growing trend of OCGs using private homes for large-scale cannabis production, moving away from commercial spaces to evade detection. As part of a criminal network, Williams was found guilty of participating in the illicit cannabis trade, which posed significant risks to the safety and wellbeing of people in affected communities. The authorities emphasised the increasingly sophisticated methods employed by these organised groups, such as falsifying tenant references and manipulating utility meters to bypass detection.

R v Lazaj and others (2024)

Fjoraldo Lazaj, a 26-year-old, was prosecuted for leading an OCG and conspiring with others to supply cannabis across multiple localities, including Northampton, Milton Keynes and Essex. Lazaj orchestrated shipments of cannabis, often packaged in cardboard boxes and plastic bags, and coordinated handovers and deliveries. His role was uncovered through surveillance. An arrest was made when a vehicle linked to the operation and carrying 10kg of cannabis was intercepted. Mobile devices recovered during the arrest provided evidence of the group's cultivation and sales network. Lazaj

pledged guilty to conspiracy to supply a Class B drug and was sentenced to four years and four months in prison. Other associates, including Denis Mukaj and Aldi Mukaj, received sentences ranging from two to three years. Police called the operation's dismantling a significant blow to organised drug crime in the region.

R v Mahmood and others (2020)

The case involved an OCG running cannabis factories in East Lancashire. The group set up operations in multiple properties, growing thousands of cannabis plants. The investigation led to the arrest and conviction of several individuals, including Waqas Mahmood, who was sentenced to 10 years for conspiracy to produce and supply cannabis. The case highlighted the complexity of OCG operations: members were involved in managing properties, supplying cannabis and exploiting vulnerable individuals.

R v Eke (2024)

Adetunji Eke coordinated the conversion of rental homes into large-scale cannabis farms. He used fraudulent leases to avoid detection and sourced individuals to cultivate cannabis. The farms, located in Birmingham and nearby areas, were raided in late 2023 following tip-offs. The police found over 400 cannabis plants and associated cultivation equipment. Eke was charged with conspiracy to produce cannabis. Evidence presented during the trial linked him to payments for equipment and fraudulent tenancy agreements. He received a five-year prison sentence in 2024 for his role as a facilitator for OCGs involved in the illicit cannabis trade.

Key themes from cases:

- Many cases involve sophisticated, organised networks including OCGs that exploit PRS properties
- Damage to property through alterations and the creation of fire hazards are common, often leaving properties requiring costly repairs
- Trafficking, exploitation and coercion of people are common features of cases
- Landlords can be directly or indirectly involved in operations – including through not reporting suspicious behaviour.

Cannabis farms and the private rented sector in the news

- [Property management company secured homes for cannabis production](#)
- [Landlord working abroad targeted by fake letting agent in London](#)
- [Police warn landlords about the need for regular property checks](#)
- [Crime gangs targeting empty high streets for cannabis production](#)
- [Four arrested in connection to cannabis production across Leeds](#)
- [Fake workmen who dug up roads to power cannabis farms jailed](#)
- [Tenant jailed for cannabis farm in three-bed house in Exeter](#)

Case studies

Case study: Operation Mille

In June 2023, Operation Mille was a landmark initiative against OCGs involved in large-scale cannabis cultivation and associated criminal activities. This was the largest coordinated effort of its kind, involving the mobilisation of all 43 police forces across England and Wales. Its aim was to disrupt the activities of OCGs, while addressing the broader impacts of cannabis cultivation on communities and public safety.

The operation achieved significant results:

- Over 1,000 raids were conducted, leading to numerous arrests and the dismantling of criminal networks
- Nearly 200,000 cannabis plants, valued at £130m, were seized
- Additional confiscations included £636,000 in cash, 26kg of cocaine and 20 firearms, highlighting the multifaceted criminal operations of the targeted OCGs
- Enhanced intelligence was gathered on the connections between cannabis cultivation, violence and human exploitation, providing valuable insights for future law enforcement strategies.

Operation Mille revealed the widespread incidence of large-scale cannabis farms, often situated in residential properties. These illegal operations cause significant issues, including extensive property damage, tampering with utilities such as electricity and water, and heightened risks to community safety. Furthermore, these farms are commonly linked to other crimes, including human trafficking, as vulnerable individuals are exploited to maintain and operate the sites.

Lessons learned

- 1 **Coordinated action heightens impact:** collaboration across all police forces in England and Wales was instrumental in the success of Operation Mille, underlining the importance of unified efforts in combating organised crime
- 2 **Intelligence is crucial:** the operation highlighted the need for ongoing intelligence gathering to understand the links between different criminal activities, such as drug production, violence and human exploitation
- 3 **Preventative measures are necessary:** landlords and property owners must be vigilant about tenant screening and property inspections to prevent illegal activities like cannabis farming in residential properties
- 4 **Community awareness enhances safety:** educating communities about signs of cannabis cultivation – such as covered windows, unusual smells and excessive electricity use – can aid early detection and reporting
- 5 **Comprehensive criminal strategies work:** addressing cannabis cultivation alongside related crimes – such as money laundering and firearms possession – maximises disruption to [OCGs](#).

Case study: Cannabis Grow Aware scheme, Operation Instinct and the Cheshire partnership

The Cannabis Grow Aware (CGA) scheme and associated initiatives like Operation Instinct are programmes designed to combat the misuse of residential properties for illegal cannabis cultivation. These efforts focus on educating landlords and managing/letting agents to identify and address signs of cannabis farms in rental properties.

The key aspects of these initiatives are:

- 1 **Raising awareness:** landlords are trained to recognise the signs of cannabis cultivation, such as strong smells, blacked-out windows, excessive heat, unusual utility usage and suspicious activity like frequent late-night visitors
- 2 **Collaborative efforts:** local councils and police forces, such as those in Halton and Barnsley, have partnered to support these schemes. Police provide guidance on what landlords can do if they suspect illegal activity, including mandatory reporting to authorities
- 3 **Preventative actions:** landlords are encouraged to conduct thorough tenant background checks, make regular property inspections and use visible deterrents like 'cannabis aware' stickers in property windows to signal proactive monitoring
- 4 **Community involvement:** these schemes rely on community vigilance, with police urging residents to report suspected cannabis-related activities. Calls may not result in immediate action due to investigative requirements, but every report will aid intelligence gathering.

Data from the Cheshire constabulary found that most of the cannabis grows in the area were being carried out at private rented properties and that little was being done to prevent and deter criminals.

To target the threat, partnership working was established between:

- Cheshire Constabulary
- Halton Borough Council
- Warrington Borough Council
- The local Chamber of Commerce
- Cheshire Fire and Rescue.

Through data sharing the partners identified:

- Private rental properties being used for cannabis grows
- Criminals taxing cannabis growers (often with force)
- Fires at residential and business properties, attributed to grows
- Environmental issues associated with cannabis waste, including fly-tipping.

To address the threat, a number of strands of work were developed including:

- **Promotion:** the constabulary and local council worked in partnership to promote the scheme, which was also publicised through Crimestoppers

- **Targeted promotion:** housing providers and social landlords were leafleted to promote the [CGA](#) scheme
- **Sign-up scheme:** landlords were encouraged to join the sign-up scheme that promotes the benefits of checks and visits to properties every 8 – 10 weeks from the start of the tenancy (because cannabis requires 12 weeks to grow)
- **‘Op initiators’:** a problem-solving team visited the 10 most at-risk addresses in each area; all of the addresses to be rechecked at a suitable interval and CGA stickers placed in windows
- **Liaison with Royal Mail:** partners liaised with Royal Mail to encourage reporting of potential indicators to Crimestoppers, for example, on noticing suspicious smells and sealed letterboxes
- **Targeting:** where evidence/intelligence suggested cannabis grows at a property and landlords avoided the scheme, the property would be made subject to scrutiny, specifically tenancy and housing checks made by the council plus police system checks.

Case study: Operation Surge – Rotherham partners

In collaboration with Northern Powergrid and Rotherham Council, South Yorkshire Police undertook a series of operations aimed at combating drug-related crime, power theft and anti-social behaviour in the areas of Eastwood, Maltby and Dinnington. The initiative was prompted by power outages in Eastwood, traced to illegal connections to the electricity grid. These connections were being used to power cannabis farms, triggering a multi-agency response that targeted criminal networks and problem landlords.

The operations achieved significant outcomes. Northern Powergrid successfully resolved the power outages by eliminating the illegal connections and restoring reliable electricity to affected communities. South Yorkshire Police executed 122 warrants during the crackdown, resulting in 50 arrests and the recovery of substantial amounts of cannabis. In one notable raid, officers discovered 199 cannabis plants with an estimated value of £200,000. Additionally, under the Housing Act, 120 prohibition notices were issued to landlords whose properties were being misused. The operation’s success led to its expansion beyond Eastwood to include Maltby and Dinnington, with ongoing investigations to explore links between cannabis farming and other criminal activities.

As part of the broader effort, Operation Surge was launched in Rotherham town centre to tackle drug-related crime, retail theft and anti-social behaviour. This initiative incorporated high-visibility patrols, targeted raids and a collaborative approach involving local police teams, the specialised Fortify Tasking Team, dog units and Rotherham Council. Notable successes included the seizure of significant quantities of cannabis and arrests for drug production and possession with intent to supply. Officers also addressed persistent community issues such as street drinking and begging, aiming to enhance public safety and improve the town’s overall environment. The operation’s strategy was developed collaboratively, ensuring a coordinated and effective approach to enforcement.

Lessons learned

- 1 **Multi-agency collaboration is essential:** partnerships between police, councils and utility companies can effectively address interconnected problems such as drug crime, power theft and anti-social behaviour
- 2 **Targeted enforcement yields results:** focused raids and patrols can disrupt criminal activities and improve community safety
- 3 **Comprehensive strategies enhance impact:** combining high-visibility policing with targeted enforcement ensures broader success in tackling both crime and its underlying causes
- 4 **Landlord accountability matters:** serving prohibition notices and holding landlords accountable help mitigate the misuse of residential properties for criminal purposes
- 5 **Community engagement strengthens efforts:** addressing visible issues like street drinking and begging fosters trust in law enforcement and improves the quality of life for local residents.

Operation Baseend – Leeds cannabis farms

Operation Baseend was launched by West Yorkshire Police in September 2022 to dismantle a growing network of industrial-scale cannabis farms across Leeds. Intelligence-led and highly targeted, the operation sought to disrupt OCGs profiting from the cultivation and distribution of cannabis on a massive scale. The operation uncovered not only the breadth of drug production but also the sophisticated methods employed by criminals to secure properties, including the exploitation of legitimate lettings systems.

The investigation revealed clear links between the large-scale cannabis operations and organised crime groups, particularly those of Albanian origin. These groups employed complex methods to conceal their activities, including the fraudulent use of property management companies to gain access to residential properties.

At the centre of this were Mirel Neatu, Marius Nedelcu, and Seyan Debnath. Leeds Crown Court heard that the three men secured homes from legitimate landlords by presenting themselves as property managers. They had no intention of letting the properties to genuine tenants. Instead, once leases were signed, the properties were handed over to OCGs to be converted into cannabis farms.

West Yorkshire Police confirmed that the property management companies involved were linked to a wider investigation into 75 cannabis farms, primarily located in and around the Harehills area of Leeds. It is estimated that the farms connected to these lettings activities produced cannabis with a street value exceeding £4.5m. The farms were typically set up in residential homes, causing severe structural damage and presenting fire and safety hazards to surrounding communities. The exploitation of the property rental market in this way allowed the criminal networks to expand rapidly, using seemingly legitimate businesses as a cover for large-scale illicit operations.

On 28 July 2023, officers from the operation executed a raid at an industrial unit on Armley Road, Leeds. During the search, police discovered 2,342 cannabis plants, confirming suspicions that the premises had been converted into a large-scale

cannabis farm. Five men were arrested at the scene, charged with the production of a Class B drug and later convicted. Those sentenced included: Ervin Mezyri, aged 35 – 56 months' imprisonment; Fejzi Canai, aged 59 – 48 months; Klemend Mezuri, aged 45 – 45 months; Aurel Alimucaj, aged 43 – 40 months; and Emiliano Licaj, aged 26 – 36 months.

The raid at Armley Road represented one of the largest single seizures under the whole operation, but it was only a small part of a much wider initiative. Since its launch, the operation has been responsible for:

- Raiding 77 industrial-scale cannabis farms
- Arresting 97 individuals linked to cultivation and trafficking
- Seizing cannabis with an estimated street value of over £20m
- Securing combined prison sentences totalling more than 92 years.

After the convictions, police spokesperson Simon Green emphasised that these results demonstrated the force's commitment to targeting organised criminals who 'blight the communities of Leeds District through the illegal drugs trade'. He warned that any individuals found engaging in such enterprises could expect severe custodial sentences.

Lessons learned

- 1 **Targeted operations yield significant results:** focused initiatives can effectively dismantle large-scale illegal operations, leading to substantial drug seizures and arrests
- 2 **Inter-agency collaboration is key:** cooperation between police departments and agencies enhances resource allocation and operational success
- 3 **Intelligence gathering is vitally important:** accurate and timely intelligence is crucial in identifying and targeting illicit activities, ensuring successful interventions
- 4 **Community engagement enhances effectiveness:** encouraging community members to report suspicious activities can lead to actionable intelligence, bolstering law enforcement efforts
- 5 **Continuous monitoring prevents re-establishment:** ongoing surveillance and follow-up operations are necessary to prevent the resurgence of dismantled criminal enterprises
- 6 **Regulation of property lettings is essential:** implementing stricter regulations and oversight in the property rental sector can help prevent exploitation by organised crime groups
- 7 **Public awareness campaigns are beneficial:** educating the public about the signs of illicit activities can empower communities to assist in crime prevention efforts.

C2: Modern slavery and human trafficking

In summary

- Modern slavery is a broad term that encompasses the severe exploitation of individuals by others for personal or commercial gain
- It involves situations where individuals are controlled, coerced or deceived into conditions from which they cannot escape, resulting in the loss of their freedom
- Forms of modern slavery include human trafficking, forced labour, sexual exploitation and debt bondage
- Modern slavery is often linked to other forms of organised criminal activity
- Tackling modern slavery requires a multi-agency approach, with key partners including the police, the [GLAA](#) and Immigration Enforcement
- A local authority has a legal duty under section 52 of the Modern Slavery Act 2015 to notify the Home Office if any council employee has encountered anyone they suspect of being a victim of modern slavery.

In detail

The term modern slavery encompasses many forms of exploitation, including human trafficking which specifically refers to the act of recruiting, transporting or harbouring individuals for the purpose of exploitation. Other forms of modern slavery include forced labour, sexual exploitation and debt bondage. Victims may be subject to multiple types. It is a particularly serious crime type which is likely to have long-term psychological, emotional and physical impacts on the victim. Modern slavery affects men, women and children. It affects British citizens as well as individuals from other countries. Currently, as many as 13,000 people are thought to be held in modern slavery in the UK. Much of this is linked to private rented sector (PRS) properties.⁵ Cases are often linked to organised crime groups (OCGs) and networks. Many victims do not realise they are in slavery or being exploited.

Types of modern slavery

Human trafficking

A common type of modern slavery is human trafficking. A trafficker is someone who arranges or facilitates the transport of an individual from one location to another in order to exploit them. This may be international, national, local or even moving someone within the same property from one room to another. Taking individuals away from familiar environments – family, friends or other support networks – enables the exploiter to isolate their victim and create a dependency on them. Traffickers prey on vulnerable people – people facing economic hardship, social isolation or unstable circumstances. Exploiters use promises of work, education or a better future to lure them to a better life. Victims are trapped through force, threats and manipulation. They often have their personal and identification documents confiscated, making escape extremely difficult. Human trafficking affects millions of people worldwide.⁶

⁵ See Office for National Statistics, [Census data – modern slavery in the UK](#)

⁶ See International Labour Organisation, [Global estimates of modern slavery](#)

The following groups and percentages are based on information and estimates from the National Referral Mechanism (NRM), the UK's primary framework for identifying and supporting victims of human trafficking, and on other reports from agencies like the [NCA](#) and the Home Office.⁷ The exact distribution may vary from year to year based on migration trends, trafficking routes and interventions by law enforcement.⁸

- Eastern Europe (Romania, Poland, Albania) is a significant source of labour trafficking, particularly for exploitative work in construction, agriculture and domestic servitude (approximately 50% of trafficking victims to the UK)
- Nigeria and Vietnam are major sources for sexual exploitation and forced labour, often facilitated by OCGs (approximately 25% of trafficking victims to the UK)
- South and South-East Asia (India, Pakistan, Bangladesh and China) contribute a significant share of victims trafficked for both labour exploitation and sexual exploitation (approximately 15% of trafficking victims to the UK)
- Sub-Saharan Africa also represents a considerable share of trafficking victims, many of whom are exploited for forced labour or sexual exploitation (approximately 5% of trafficking victims to the UK)
- Brazil (approximately 3% of trafficking victims to the UK).

Spiritual and ritualistic abuse can also be considered part of modern slavery or human trafficking in certain contexts, depending on the circumstances and intent. These forms of abuse are often used as tools of control, coercion and exploitation, aligning them with the broader patterns seen in trafficking and slavery. Perpetrators may use spiritual or ritualistic practices to exert control over victims, instilling fear of harm or supernatural consequences if they disobey. This can trap victims in exploitative situations. Victims may also be trafficked for rituals or ceremonies, where their bodies, labour or even lives are exploited. For example, in some cases of trafficking, practices such as 'juju' or other rituals are used to bind victims psychologically, particularly in sex trafficking.⁹

Debt bondage

Also known as bonded labour, debt bondage is a common feature of modern slavery, in which people are exploited via the premise of needing to repay a debt or loan. In these situations, the terms of repayment are controlled entirely by the exploiting person or organisation, making it nearly impossible for the individual to repay the debt and regain their freedom. In many cases, the initial debt may be quite small (or even made up by the exploiter to make the person indebted to them), but exploiters charge exorbitant interest, impose additional fees or deduct inflated costs for food, shelter or 'protection'. This traps the individual in a cycle of debt that can last for years or even a lifetime. In some cases, debt bondage may even be passed from one generation to the next, with children born into the same debt their parents incurred. Despite being

⁷ The National Referral Mechanism (NRM) is the UK's official framework for identifying and supporting victims of modern slavery and human trafficking. It is designed to ensure that victims receive appropriate protection and support. First responders can refer individuals to the NRM. These include: police, local authorities, UK Border Force, and [NGOs](#). For further details or to make a report see [the government web pages on modern slavery](#).

⁸ For further information, see [National Crime Agency](#) and the [Anti-slavery website](#)

⁹ Juju is a West African spiritual belief system often used in rituals. It can be exploited in human trafficking to manipulate and control victims through fear and superstition.

illegal in most countries, debt bondage remains widespread due to economic inequality, lack of access to legal support and the hidden nature of many exploitative practices.

Forced labour

Individuals in forced labour conditions are compelled to work against their will through manipulation, coercion or outright force, often in gruelling conditions. Workers may be threatened with harm, homelessness, deportation or financial ruin if they attempt to leave or complain. Exploiters may withhold wages, restrict movement or confiscate personal and identity documents to ensure compliance. This type of exploitation occurs in various industries (legal or illegal) worldwide, including agriculture, construction, manufacturing, hospitality and domestic work, and has even been found in religious settings. Nail bars and car washes are recent examples where the identification of exploitative practices has led to government support for operations to disrupt exploitation.

Forced labour is also frequently linked to vulnerable populations, such as migrant workers or people in extreme poverty, who may be lured by false promises of well-paid jobs or a better life. Factors like weak labour laws, lack of legal protections and limited access to social support networks often allow forced labour to persist even in places where it is illegal.

Sexual exploitation

In the context of modern slavery, [sexual exploitation](#) involves forcing or manipulating individuals into sexual acts they do not wish to perform or consent to. This is often through threats, violence, deception or abuse of power. It can be commercial, where exploiters profit financially or materially – for example, via prostitution or pornography. It may be non-commercial and can also be a feature of other types of exploitation (such as domestic servitude). In some instances, there may be an agreement to participate in sex work, but not for the type or frequency of activity they are subjected to.

Victims of sexual exploitation may be recruited or trafficked under false promises of legitimate work or better opportunities. Once under the control of their exploiters, they are often subjected to isolation, threats, psychological manipulation, physical abuse and restricted freedom. Vulnerable individuals – such as children, women from disadvantaged backgrounds, or people with limited social support – are often targeted. In many cases, traffickers confiscate personal or identification documents, use debts as a form of control or threaten to harm the victim's family members to maintain power over them.

Criminal exploitation

Criminal exploitation is where a person is forced to commit a crime for someone else's gain, often part of more organised criminal activity. For example, victims could be forced into drug cultivation (such as cannabis farming) and dealing, prostitution, shoplifting, pickpocketing or fraud. Again, victims may be threatened, manipulated or tricked into carrying out criminal activities, or it may be part of 'repayment' for 'services'

they have received, or a debt owed (which is controlled or even invented by their exploiter). They may also be cuckooed as part of the criminals' operations.

All these forms of modern slavery are often interconnected, involving layers of abuse and exploitation. Combating them requires coordinated efforts across legal, social and economic systems.

How landlords can be involved/implicated

In the UK, landlords can become involved in modern slavery. Sometimes this is intentional, but is often unintentional – for example, through facilitating or overlooking exploitative practices happening in their properties. Here are some scenarios:

1 Providing housing to exploiters or traffickers

- Some landlords unknowingly rent their properties to people involved in human trafficking, drug cultivation, prostitution or forced labour operations. Criminals may then sublet rooms to vulnerable people, often charging exorbitant rents and forcing them into exploitative work situations. There is also recent evidence suggesting that both criminals and landlords may shift their activities to Airbnb markets when scrutiny of their usual operations or local areas becomes too intense
- Landlords may lease properties to businesses or individuals who house trafficked individuals in poor conditions and force them to work in labour-intensive, low-wage jobs – for example, using the property for sex work or drug cultivation
- Victims of trafficking often live in substandard conditions. Traffickers may seek out landlords who do not ask questions or who maintain minimal oversight of their properties. This is especially common in low-rent or poorly regulated areas.

2 Lack of due diligence and awareness

- Landlords who fail to conduct thorough background checks on prospective tenants or do not monitor property usage may inadvertently enable traffickers to use their properties as hubs for exploitation
- A lack of regular property inspections may allow traffickers to conceal exploitative practices from property owners.

3 Illegal evictions and intimidation

- Some landlords engage in or permit illegal evictions, which may target individuals without legal status or people unable to assert their rights because of language, economic or psychological barriers. These psychological barriers often stem from fear or uncertainty about being in a foreign country and doubts about their legal status to remain. Such people may feel powerless and are often forced into dependence on exploitative employers, especially if they lack the financial means, social connections or confidence to secure alternative housing.

4 Turning a blind eye to suspicious behaviour

- Landlords might overlook signs of modern slavery, such as multiple people coming and going at irregular hours; high turnover of tenants; or tenants showing signs of fear, injury or lack of freedom. Failure to investigate or report such situations can allow exploitation to continue.

5 Exorbitant rent and debt bondage

- Landlords may charge exorbitant rents, forcing tenants into debt. This debt can then be used as leverage to compel them into working for the landlord under exploitative conditions, often in lieu of rent. This resembles debt bondage
- Landlords may exploit vulnerable tenants by offering furniture or fittings as a 'loan', which the tenant might not realise is not part of the tenancy agreement. Later the landlord converts these into hidden debts, creating debt bondage and financial dependency not covered under normal tenancy rules
- In some cases, landlords may confiscate tenants' personal or identification documents (such as passports) to control and exploit them, a tactic also seen in human trafficking.

6 Sexual favours in lieu of rent

- The practice of sex in lieu of rent occurs when landlords exploit tenants by demanding or coercing sexual favours as an alternative to rental payments. This is widely recognised as a form of sexual exploitation and abuse of power. Vulnerable tenants, particularly those in precarious financial situations, may be pressured into such arrangements because they fear eviction and homelessness.¹⁰

Legal responsibilities of landlords

Landlords in the UK can be prosecuted under the Modern Slavery Act 2015, if they knowingly or recklessly allow their properties to be used for exploitative purposes, including forced labour or sexual exploitation. This legislation criminalises activities related to modern slavery, including harbouring victims or benefiting financially or otherwise from such activities.

In practice, prosecutions have occurred in cases where landlords turned a blind eye to illegal activities such as the operation of pop-up brothels in their properties – for example, where organised crime groups have exploited short-term rental agreements to traffic and exploit vulnerable individuals, often women. In these cases, landlords have been implicated when they failed to conduct appropriate due diligence or they knowingly rented properties to individuals engaged in trafficking operations.

While successful prosecutions under the Modern Slavery Act are relatively rare, landlords can also face consequences under related laws, such as legislation

¹⁰ For further information, see National Women's Centre, [Sex for rent, an NWB report on sexual exploitation and sexual harassment in the rental housing market](#)

addressing negligence or permitting the use of premises for illegal activities.¹¹ Prosecution may depend on evidence that the landlord was aware or should reasonably have been aware of the exploitation occurring on their property.

Impact of modern slavery and human trafficking in the private rented sector

Modern slavery – including human trafficking, exploitation and forced labour – has a devastating impact on tenants, landlords and communities in the PRS. Often coerced or trafficked into exploitation, victims endure physical, emotional and psychological abuse. Their freedom is stripped away as they are forced to live and work in subhuman conditions. For landlords, unknowingly renting to people involved in modern slavery can have serious legal consequences, including criminal charges, financial losses and reputational damage. These illegal activities can also lead to property damage and long-term challenges with tenancy management. For the wider community, the presence of modern slavery undermines safety and stability, contributing to a rise in crime and exploitation. The normalisation of such activities can create a culture of fear, lower the quality of life and make neighbourhoods less desirable, ultimately reducing property values and depressing economic growth.

Red flags: what to look out for

There are a number of general [red flags](#) that might indicate modern slavery is operating in PRS properties. Here is what professionals and landlords should look out for.

- 1 Isolation from normal activity/interactions. They:
 - are rarely allowed to travel on their own
 - are under the control of others
 - have a lack of interaction with other people
 - appear unfamiliar with the locality where they live and/or work
 - have atypical relationships – for example, a young teenager being friends with a much older adult.
- 2 Restricted freedom of movement. They:
 - do not have access to key documentation such as passports, ID and their driving licence
 - rarely leave the property – or only go to a very limited number of places (e.g. only go to work and do not go shopping or visit family/friends)
 - have few personal possessions.
- 3 Reluctance to seek help. They:
 - avoid eye contact
 - appear frightened or are hesitant to talk to strangers
 - are afraid of, or are unwilling to engage with, law enforcers/authorities

¹¹ Including Sexual Offences Act 2003; Misuse of Drugs Act 1971; Housing Act 2004; Criminal Law Act 1977; Proceeds of Crime Act 2002 (POCA) and Anti-social Behaviour, Crime and Policing Act 2014.

- fear deportation
 - are unsure who to trust or where to get help
 - fear violence against themselves or against their family.
- 4 Physical appearance. They:
- show signs of abuse – such as untreated injuries, anxiety, agitation or presenting as withdrawn and neglected
 - are unkempt or malnourished
 - wear the same clothes day in, day out
 - wear clothes that are ‘unsuitable’ – for example, for their type of work.
- 5 Poor living conditions. They:
- live in dirty, cramped or overcrowded accommodation, which may have had its electricity supply disabled
 - work and live at the same address
 - may say they want to take a bath or shower, which could indicate they are not allowed to or do not have access to one.
- 6 Unusual living conditions
- If doors are unlocked/open and/or keys are kept in door locks, this may suggest that individuals do not have independent access/autonomy to come and go as they please
 - If living arrangements are unusual, if use of the rooms is out of the ordinary or if some parts of the property have restricted access to some of its occupants – these things may suggest there is control over the environment
 - If there are multiples of the same items (such as bottles of water, bags of pasta), this may suggest individuals are issued with a ‘ration’ rather than having the freedom to select their own items
 - If the volume of clothing does not appear to match the number of people living at the property – for example, if there are excessive or insufficient pairs of shoes in evidence
 - If it is apparent that there is a single/small number of spokesperson(s) for the property’s occupants, while others say little or nothing
 - Signs of witchcraft/voodoo and/or expressions of a fear of such practices may indicate that these are being used to control individuals.
- 7 Unusual travel arrangements
- They are always accompanied – always dropped off at/collected from work and very early in the morning or late at night
 - Children are dropped off/picked up in private cars or taxis at unusual times and in places where it is not clear why they would be there.

Specific signs of spiritual or ritualistic abuse

- Presence of unusual ritual objects such as altars, candles, symbols or items used in rituals that seem out of place or make individuals uncomfortable. Also charms, amulets or other items used for controlling or ‘protecting’ people

- Signs of forced participation in rituals such as bloodstains, unusual markings or clothing or the presence of items like ritualistic robes, instruments or tools that suggest forced involvement in practices
- Victims bearing unusual tattoos, scars or marks on their bodies, which could be related to rituals or spiritual control – for example, symbols, numbers or names tied to occult practices
- Evidence of threats or statements made to individuals about supernatural punishments or curses if they attempt to leave or resist their situation. Victims may express fear of spirits, curses or divine retribution
- Victims being isolated or having restricted outside contact – having been told that the outside world is dangerous or that only the abuser can protect them spiritually
- Evidence of secret spaces or rooms within the property used for conducting rituals or ceremonies – for example, locked or hidden areas, basements or attics with unusual set-ups.

Specific signs of labour exploitation

Affected industry sectors include hospitality and catering, agriculture, horticulture, fishing, construction, car washes, nail bars and retail. Catering, car washes, nail bars and retail can often be linked to PRS properties where shops are situated in the same premises. Victims:

- lack independence/movement and/or are always accompanied
- are transported to and from work, perhaps with a number of people in one vehicle
- lack protective equipment, suitable clothing or training to do their job safely
- work unusually long hours
- do not have a contract, are paid less than the national minimum wage – or are not paid at all
- are forced to stay in accommodation supplied by their employer – which may be overcrowded and providing poor living conditions
- are afraid to accept money or payment
- may have their legitimate wages taken by an exploiter who is outside the business or workplace.

Specific signs of sexual exploitation

Victims:

- appear frightened, withdrawn or confused
- are closely guarded
- are ‘branded’ with a tattoo. Traffickers sometimes brand or mark their victims as a form of control. Tattoos may include the names/initials of the trafficker, barcodes/numeric codes or crown symbols to denote dominance or gang affiliation
- show signs of physical abuse, such as bruising, scarring and/or cigarette burns
- are unable to keep payments and have restricted or no access to their earnings
- have limited English vocabulary, often restricted to sexualised words
- have male visitors calling day and night and staying only for a short time.

Also:

- Signs of sexual activity in the locality, such as cards and advertisements nearby

- A group of female foreign nationals living at the same address (although it should be noted that British nationals are also affected by sexual exploitation)
- People sleeping and working at the same property could indicate a brothel is operating.

Specific signs of criminal exploitation

- A large group of adults or children being moved daily to different locations and being returned to the same place at night could indicate forced criminality such as begging, pickpocketing or shoplifting
- Victims not benefiting from money or items obtained through crimes they have been forced to commit
- Victims having restricted movement
- Victims having no English or a limited vocabulary
- The presence of a known drug dealer at the property (or the regular presence of individuals who are not tenants) may indicate that occupants are being forced or manipulated out of their home, so that it can be used as a base to sell drugs
- Unusual behaviour may indicate a young person is being forced to carry and sell drugs across county borders – behaviour such as frequently travelling alone at unusual times, exhibiting anxiety, having more than one phone, having lots of cash, drug/alcohol use and being accompanied by older individuals.

Response

To tackle modern slavery in PRS properties, local authority housing departments should work closely with other agencies, in particular those appointed as 'first responders'. First responders are organisations and professionals who are designated to identify and refer potential victims of modern slavery to the [NRM](#). They are responsible for submitting the initial referral to the NRM, usually after suspecting that a person may be a victim of trafficking or exploitation. First responders include the police (including the [NCA](#)), local authorities, Home Office staff, border force personnel, healthcare professionals and some non-governmental organisations (NGOs) – such as the Salvation Army, Migrant Help and Unseen.

This multi-agency approach combines the strengths of housing enforcement, criminal investigation, labour regulation and immigration expertise to protect victims, disrupt criminal networks, hold exploiters to account and secure stricter oversight of housing standards. Ultimately, a unified response can more effectively combat exploitation and restore safe and better housing.

1 Engaging the police and other specialist units

Local authority housing enforcement teams typically collaborate with police units experienced in dealing with human trafficking and exploitation, including:

- **The [National Referral Mechanism \(NRM\)](#)**: overseen and operated by the Home Office, this framework is designed to ensure that individuals who may have been exploited are provided with appropriate care, protection and support, while their cases are investigated

- **The National Crime Agency** is the UK's lead law enforcement agency in tackling modern slavery and human trafficking. Working with other agencies, its specific role includes conducting high-level investigations into trafficking networks, using intelligence sharing across national and international borders and coordinating operations to rescue victims and apprehend traffickers
- **Organised crime units (OCUs)**: these units target [OCGs](#) behind trafficking and exploitation, particularly where multiple properties are involved. Tackling Organised Exploitation ([TOEX](#)) teams are embedded within these units
- **Safeguarding units**: these teams protect vulnerable individuals (including trafficking victims) and often coordinate with social services to support victims' welfare
- **Gangmasters & Labour Abuse Authority**: the GLAA investigates labour exploitation, particularly in cases where tenants are exploited for forced labour. They can provide essential expertise in identifying forced labour patterns and can work with authorities to secure safe working and housing conditions for victims
- **Immigration Enforcement**: in cases where victims may be undocumented or have unclear immigration status, Immigration Enforcement officers can help assess each individual's situation. They can distinguish between victims of trafficking and individuals complicit in exploitation, ensuring vulnerable individuals receive appropriate protection rather than punitive measures. As well as collaborating with police forces and the [GLAA](#), they engage with agencies such as [HMRC](#) and [NGOs](#) to identify and tackle cases of modern slavery.

2 Intelligence gathering and multi-agency sharing

Housing enforcement teams often observe signs of exploitation during inspections – such as overcrowding, restricted tenant movement and suspicious rental practices – and can gain intelligence from other agencies when out and about or attending meetings, as well as information received from the public.

Meanwhile, the police, Immigration Enforcement and other agencies gather intelligence (including public tip-offs) on networks involved in human trafficking, smuggling and labour exploitation in order to target and prioritise organised crime that exploits immigrants and traffics individuals into the UK.

High-risk sectors (such as agriculture and hospitality) are monitored to identify exploitative practices and trends in labour abuse in order to increase the chances of uncovering modern slavery. The GLAA's intelligence on labour practices can be crucial in cases where tenants are also victims of labour exploitation. Mapping and monitoring the supply chain (by industry and by country/location) is a key part of the response. Sharing this intelligence through multi-agency meetings allows agencies to build a more detailed picture of patterns and risks and to develop coordinated strategies for intervention.

3 Coordinating joint inspections and operations

When a property is deemed high risk for exploitation, housing enforcement can organise joint inspections with police, immigration and GLAA officers. Police

officers secure the site; immigration officers verify identities and statuses; and GLAA officers assess labour conditions. Housing enforcement checks tenancy and safety conditions, adding strength to the case for enforcement. Together, these agencies can act quickly if exploitation is confirmed, safeguarding victims, documenting evidence and disrupting illegal operations.

4 Safeguarding victims and providing support

Designated organisations (such as Immigration Enforcement, local authorities, the police, the [NCA](#) and the GLAA) can refer potential victims to the [NRM](#) – the UK's framework for identifying and supporting victims of human trafficking and exploitation, overseen and operated by the Home Office. Referral ensures that potential victims receive access to support services, including legal advice, medical assistance, safe accommodation and counselling. The GLAA can ensure victims are removed from abusive labour situations. Comprehensive support is vital, especially for victims without legal status, who may fear deportation without these protections in place.

5 Applying for closure orders and pursuing prosecutions

Where properties are repeatedly used for exploitation, an application for a closure order can be lodged with the magistrates' court under the Anti-social Behaviour, Crime and Policing Act 2014. Once issued, the order prevents people from accessing or using a property for a specific period – usually up to three months but can be extended – preventing further abuse of victims. Evidence from police, housing, immigration and GLAA inspections can support prosecutions against landlords, agents and employers who facilitate exploitation. The GLAA's evidence on forced labour can strengthen criminal cases, while the police concentrate on trafficking charges; immigration handles status and identity matters; and housing provides documented tenancy violations.

6 Community education and encouraging reporting

Community awareness is an important factor in helping prevent situations that may lead to modern slavery and in increasing identification of exploitation where it occurs. Many victims do not know they are in slavery and/or do not know that support is available. Police, local authorities, Immigration Enforcement and the GLAA can raise public awareness of the signs of modern slavery and provide anonymous reporting channels. Immigration Enforcement focuses on outreach with migrant communities. The GLAA applies itself to outreach work in industries where vulnerable workers may be at risk, and informs businesses about their legal obligations. Housing can provide tenants with information on rights and protections, and landlords with information on their responsibilities and signs to look out for. This multi-agency effort empowers communities to report suspicious activity and supports the discovery of new cases.

7 Cross-border collaboration

Given the international nature of modern slavery, collaboration with agencies across Europe and other countries is a key part of the response – particularly by Immigration Enforcement, the GLAA and the police. This helps tackle the movement of trafficked individuals and stops exploitative recruitment practices at source. International agencies such as Europol and Interpol – as well as authorities in source and transit countries – are key collaborators for disrupting trafficking and smuggling routes that contribute to modern slavery.

Additional powers of Immigration Enforcement

On top of the partnership work noted above, Immigration Enforcement has a number of specific powers that can be used to combat modern slavery:

1 Immigration raids and inspections

- Immigration Enforcement has the authority to conduct raids on premises where illegal immigration or labour exploitation is suspected. These inspections often target high-risk industries like agriculture, construction, hospitality and domestic work, where there is higher incidence of labour exploitation and modern slavery
- Raids allow officers to identify undocumented migrants and uncover exploitative practices. During these operations, officers also check for indicators of forced labour and human trafficking, such as restricted movement, withheld wages and poor living conditions.

2 Enforcement powers under the Immigration Act 2016

- The Immigration Act 2016 grants Immigration Enforcement officers specific powers to investigate labour abuses and breaches of immigration law, including powers to arrest, search premises, seize evidence and prosecute offenders
- In cases where employers are found to be knowingly hiring undocumented workers or exploiting vulnerable migrants, Immigration Enforcement can impose civil penalties and criminal sanctions on the employer. Employers found guilty of knowingly hiring workers without legal status can face fines of up to £20,000 per illegal worker plus potential imprisonment
- This system discourages employers from exploiting undocumented migrants and acts as a deterrent against labour exploitation, as businesses face significant financial and legal repercussions for non-compliance.

3 Powers of detention and deportation

- Immigration Enforcement has the power to detain and remove individuals without legal immigration status. While this primarily addresses illegal immigration, officers are also trained to identify possible victims of modern slavery

- In cases where someone is suspected of being trafficked or exploited, Immigration Enforcement may suspend deportation to allow the individual to receive support and undergo formal assessment through the [NRM](#).

Additional powers of the Gangmaster & Labour Abuse Authority

In addition to the partnership work noted above, the [GLAA](#) has a number of specific powers that can be used in response to modern slavery.

1 Licensing and compliance

- The GLAA operates a licensing system for labour providers in certain sectors (like agriculture, food processing, and shellfish gathering). Businesses in these sectors must obtain a GLAA licence to operate legally
- Through this licensing, the GLAA ensures that labour providers adhere to certain minimum standards on worker rights, pay and treatment, reducing the likelihood of labour abuse and exploitation.

2 Enforcement powers under the Modern Slavery Act 2015

- The GLAA can carry out investigations itself and enforce provisions of the Modern Slavery Act, specifically targeting cases of forced labour, human trafficking and other forms of exploitation
- Enforcement includes the power to arrest, search premises, seize evidence and prosecute offenders under relevant laws. This allows the GLAA to investigate and prosecute labour providers, employers and other people exploiting workers.

3 Labour market enforcement undertakings and orders

- Under the Immigration Act 2016, the GLAA can issue labour market enforcement undertakings and labour market enforcement orders to compel businesses to comply with labour laws and prevent abuse
- These measures are similar to injunctions, where businesses or individuals suspected of abusing labour laws must adhere to specific requirements, such as stopping exploitative practices – or face further legal action
- In cases where businesses are found to be in breach of labour laws, the GLAA can impose civil penalties, fines and other sanctions.

Additionally, in response to the rise in forced labour, governments and international organisations have begun promoting fair labour practices, imposing regulations on supply chains and increasing efforts to prosecute offenders. However, challenges in enforcement remain substantial.

Changes have also been made to the visa system for domestic workers, aimed at closing a significant loophole that previously left many foreign domestic workers vulnerable to exploitation. The changes made in 2016 allow domestic workers to change employers within the first six months, offering some scope for escaping abusive situations.

Partners to work with

To tackle modern slavery effectively in PRS properties, local authority enforcement teams should collaborate with a number of organisations and stakeholders. Modern slavery is often complex and requires a coordinated, multi-agency approach to identify, prevent, and prosecute cases. There are a number of key organisations that local authorities can work with.

1 Law enforcement agencies

- **Police (including local police forces and the National Crime Agency):** police can provide intelligence, conduct investigations and support enforcement actions in properties where modern slavery is suspected. A number of forces have specialist units running initiatives to address modern slavery
- **Immigration Enforcement:** in cases involving foreign nationals, collaboration with immigration services helps verify immigration status, identify trafficking victims and prevent re-victimisation
- **Gangmasters & Labour Abuse Authority:** the GLAA focuses on preventing labour exploitation and modern slavery in certain sectors, including agriculture and food processing, where exploited workers may live in rented properties.

2 Other council departments

- **Housing officers** (including environmental housing officers) help identify overcrowding, poor living conditions and other indicators of exploitation, such as inadequate facilities or unlicensed [HMOs](#)
- **Adult and children's social care:** social services work to protect vulnerable adults and children who may be at risk of exploitation. If tenants in a rented property are found to be victims of slavery, these services provide immediate safeguarding and support
- **Multi-agency safeguarding hubs (MASH)** are collaborative centres designed to improve safeguarding and child protection efforts by bringing together multiple agencies to share information and coordinate responses. Agencies may include (but are not limited to) children's social care, police, education services, health services, probation services, housing and domestic violence support.

3 Landlords and landlord associations

- **Landlords** can help detect unusual tenant turnover, overcrowding or other suspicious activities in properties they manage. Raising awareness among landlords of the signs of modern slavery is crucial to tackling modern slavery in the PRS
- **The National Residential Landlords Association (NRLA)** and similar bodies educate landlords in identifying signs of exploitation and reporting suspicions. Working with landlord associations also promotes compliance and awareness among property owners.

4 Charities and non-governmental organisations

- **Anti-slavery organisations:** organisations like the Salvation Army, Unseen UK, Hope for Justice and Migrant Help provide direct support, shelter and assistance for victims. They also train local authority teams to recognise signs of modern slavery
- **Homelessness charities:** groups such as Shelter or Crisis may encounter homeless people or rough sleepers who are vulnerable to exploitation in the [PRS](#). Charities can alert enforcement teams to suspicious situations.

5 Other services

- **NHS and local healthcare providers:** healthcare workers often encounter signs of physical or psychological abuse among potential victims of modern slavery. Sharing information between healthcare providers and local authorities can help identify and support victims
- **Mental health services:** people subjected to modern slavery often suffer severe psychological trauma. Mental health services may identify exploitation through interactions with patients
- **Fire and rescue services** can help identify unsafe and overcrowded properties during inspections, particularly unlicensed [HMOs](#), which are often used by exploitative landlords or traffickers to house multiple victims in cramped conditions
- **Banks and financial institutions** often collaborate with authorities by flagging suspicious transactions that may indicate exploitation, such as unusual cash deposits or evidence of debt bondage, where victims' wages are paid directly to traffickers
- **The general public and local communities** play a crucial role in identifying potential signs of exploitation in rented properties. Educating residents on red flags can encourage more timely reporting to local authorities
- **HMRC** can assist with investigations involving financial exploitation or illegal work practices. They can help detect businesses operating out of PRS properties where exploited individuals are forced to work
- **Modern slavery and human trafficking support agencies** such as Unseen, Hope for Justice, Medaille Trust and Causeway provide a range of support for victims (including aftercare and advocacy) and run preventative initiatives.

Prevention

To prevent modern slavery, local authority housing teams should encourage their PRS landlords to be vigilant and to maintain ethical practices, ensuring they are fully discharging their legal obligations in respect of property management. If they suspect any form of exploitation or illegal activity, they should be encouraged to report it to their local police force and to take appropriate action to address the situation.

Landlords can play a crucial role in preventing properties being used to facilitate modern slavery and in identifying instances when it occurs through:

- 1 **Regular inspections:** by regularly inspecting properties to ensure they are being used as intended and by checking for any signs of illegal activity. Landlords should

- also look for signs of vulnerability and unusual behaviour/living arrangements that may indicate someone is being exploited
- 2 **Tenant vetting:** by conducting thorough background checks on potential tenants to reduce the risk of renting to individuals who may engage in or facilitate criminal behaviour. Landlords should try to secure the names of all occupants (for example, by requiring all residents to be named on the tenancy agreement). This is useful in helping prevent subletting
 - 3 **Communication:** by maintaining open lines of communication with tenants, so that they feel comfortable reporting issues or concerns. Similarly, talking to people in neighbouring properties can help identify concerns/unusual behaviour
 - 4 **Monitoring payment records:** by checking whether rent payments are received from individuals named on the tenancy agreement (or known to be living in the property). Landlords should seek to clarify any discrepancies to understand why someone else is paying
 - 5 **Collaboration with authorities:** by working with local law enforcement and community organisations to stay informed about crime trends and best practices for preventing exploitation. Landlords can arrange to be informed of any complaints about the property, so that they can support the authorities to identify illegal behaviour linked to the property and/or its tenants. Landlords can help by reporting suspicions to authorities for investigation and action.

By staying vigilant and proactive, landlords can help safeguard their properties and contribute to the safety of vulnerable people.

Sources of information

The following are useful sources of information on modern slavery:

- Local Government Association – [*Tackling modern slavery: a guide for landlords*](#)
- [NCA's Modern Slavery and Human Trafficking Unit \(MSHTU\)](#)
- Gangmasters & Labour Abuse Authority – [Modern slavery](#)
- [National Residential Landlords Association](#)
- Right to Equality – [Sexual exploitation for rent is modern slavery](#)
- [Unseen UK](#)
- The Salvation Army – [Anti-trafficking](#)
- [Hope for Justice](#)
- [Medaille Trust](#)
- [Causeway](#)
- [Migrant Help](#)
- [Citizens Advice](#)
- [Anti-Slavery International](#)
- [UK Government's modern slavery resources](#)
- [Crimestoppers](#)
- [Human Trafficking Foundation](#)
- [Bulgarian National Commission for combating traffic in human beings](#)
- [European Commission: Migration and Home Affairs](#)
- [Neighbourhood Watch: modern slavery](#)
- [Shelter: advice and support for victims of trafficking and modern slavery](#)

Legal framework

The UK has made significant strides in addressing modern slavery through several key laws, especially the Modern Slavery Act 2015, which is one of the world's most comprehensive legal frameworks aimed at tackling modern slavery, human trafficking and forced labour.

The Act has, however, faced criticism for certain limitations, including its focus on criminalising modern slavery rather than placing obligations on businesses to prevent exploitation within their supply chains. While the Act does include transparency requirements – such as annual modern slavery statements for large companies – these measures lack strong enforcement mechanisms. Additionally, investigation and prosecution under the Act are inherently challenging because of case complexity. Factors such as victims not self-identifying or fearing retaliation from traffickers hinder the process. The legal definition of trafficking also requires that 'action', 'means' and 'purpose' are formally demonstrated – which can be difficult to establish in practice. These barriers contribute to low prosecution rates, compromising the Act's effectiveness in addressing the issue comprehensively.¹²

Below is an overview of the key laws and measures in England:

Modern Slavery Act 2015

The Act was introduced after the deaths of 23 Chinese workers in Morecambe Bay in 2004. It regulates labour providers and employment agencies in sectors vulnerable to exploitation, like agriculture, horticulture and shellfish gathering. It established the Gangmasters & Labour Abuse Authority (GLAA), which licenses labour providers and has powers to investigate cases of exploitation.

Consolidating and strengthening existing laws, the Modern Slavery Act 2015 is the most significant piece of legislation addressing modern slavery in the UK. It criminalises practices such as slavery, servitude, forced labour and human trafficking, including sexual and criminal exploitation, as well as the removal of organs. Perpetrators found guilty of modern slavery offences can face life imprisonment, reflecting the seriousness the legislation attaches to these crimes. The Act is comprehensive in scope, addressing both individual and systemic aspects of modern slavery.

The legislation also imposes obligations on businesses, requiring companies with an annual turnover above £36m to publish statements on the steps they are taking to eliminate modern slavery from their operations and supply chains. This transparency requirement seeks to encourage corporate responsibility, though enforcement mechanisms for non-compliance have been criticised as insufficient. To support and protect victims, the Act established mechanisms such as access to legal aid and the appointment of child trafficking advocates for young victims. Following the introduction of the legislation, the coverage of the [NRM](#) was extended to include all victims of modern slavery in England and Wales. The NRM provides support for potential victims of trafficking, ensuring they receive necessary care and protection.

¹² University of Hull, [Prosecutions under the Modern Slavery Act](#)

A notable feature of the Act is the creation of the role of the Independent Anti-Slavery Commissioner. This office is tasked with promoting best practices in the prevention, detection and prosecution of modern slavery offences. By enhancing coordination among stakeholders and emphasising victim support, the Act represents a significant step forward in tackling modern slavery, even as challenges in enforcement and implementation remain.

Immigration Act 2016

The Immigration Act 2016 strengthened the UK's ability to fight modern slavery by addressing exploitation in the labour market, creating new roles and penalties, enhancing victim protection and increasing transparency in business supply chains. Together with the Modern Slavery Act 2015, the Immigration Act established a framework for tackling trafficking and labour exploitation comprehensively. Under the Act, landlords renting property to undocumented migrants can also be prosecuted. By making it more difficult for traffickers to find housing for exploited people, this provision reduces opportunities for exploitation in forced labour or domestic servitude.

The Act introduced an offence for illegal working, aimed at tackling exploitation by criminalising employers who hire individuals without the right to work in the UK. It also added powers to the [GLAA](#), giving it increased authority to investigate and enforce compliance in cases of labour exploitation. The Act provides for slavery and trafficking risk orders (STROs) and slavery and trafficking prevention orders (STPOs), which place restrictions on individuals who pose a risk of involvement in modern slavery or human trafficking offences, even if they have not yet been convicted.

The Gangmasters (Licensing) Act 2004

This legislation was designed to protect vulnerable workers from exploitation in sectors where low-paid, temporary and seasonal work is common – such as agriculture, horticulture, shellfish gathering and food processing and packaging. It created the [GLAA](#) to regulate labour providers known as gangmasters, who often operate in these industries. The Immigration Act 2016 expanded the GLAA's powers beyond the specific industries covered in the 2004 Act, enabling it to investigate labour abuses in a broader range of sectors.

Sexual Offences Act 2003

'Sex for rent' could be covered by the Modern Slavery Act, but in some circumstances may be covered by the Sexual Offences Act 2003 (although the legislation was not designed with 'sex for rent' in mind). Section 52 makes it a crime for a person to cause or incite another person into prostitution for the first person's or a third party's gain. The aim is to criminalise people who cause prostitution by fraud or persuasion. Section 53 makes it a crime for one person to control intentionally another person's prostitution for the first person's or a third party's gain in any part of the world. There must be an element of control – based on coercion, force and compulsion (among other factors). Conviction can result in up to seven years in prison.

The Proceeds of Crime Act 2002

While not specific to modern slavery, [**POCA**](#) is often used to target the profits from human trafficking and forced labour. The Act enables the Government to seize assets obtained through criminal activity, including the proceeds of modern slavery. It has been used in several high-profile cases to confiscate assets from traffickers and criminal gangs.

Nationality and Borders Act 2022

This recent Act includes provisions to tackle human trafficking and exploitation. It allows for changes in the treatment of victims of modern slavery in the immigration system, although it has been controversial as it places restrictions on the rights of people who might claim to be victims of trafficking. The Act also includes provisions that may expedite deportation processes in certain cases.

Criminal Finances Act 2017

This Act targets the finances of organised crime groups and allows the authorities to seize and investigate the assets of people involved in human trafficking or modern slavery. It is intended to cut off the profits that incentivise trafficking and forced labour.

Children and Social Work Act 2017

The Act requires local authorities to provide greater support for child victims of trafficking and modern slavery. It also includes guidance for social workers on how to identify and support trafficked children.

The Immigration and Asylum Act 1999

This Act provides immigration and asylum law that intersects with modern slavery issues, particularly concerning the immigration status of victims. The law sets out protections for trafficked victims who may be at risk of deportation and establishes rights for people trafficked into the UK to remain while they cooperate with investigations.

The Children Act 1989 and 2004

While primarily focused on child protection, these Acts include provisions that are relevant to children trafficked for exploitation. The law requires that child victims of trafficking be treated as children first and provided with appropriate care and legal protection.

Together, these laws aim to prevent modern slavery, protect victims and bring perpetrators to justice. They also emphasise the importance of victim support, transparency in business practices and the pursuit of profits derived from exploitation.

Legal cases

Below are summaries of some noteworthy English legal cases involving modern slavery and/or people trafficking:

R v Baba-Tunde and others (2022)

The case involved a trafficking ring that exploited young Nigerian women. Having been transported to the UK for forced prostitution, the victims were subjected to voodoo rituals as a control mechanism, instilling fear that prevented them from escaping or contacting authorities. Baba-Tunde and accomplices were convicted of human trafficking and modern slavery offences, receiving prison sentences between five and 20 years. The case highlighted the brutal manipulation tactics traffickers use and it helped improve victim protection protocols.

R v Khan and Hussain (2023)

Khan and Hussain were found guilty of running a trafficking network that exploited vulnerable men from Eastern Europe, particularly targeting those with limited social support. Victims were lured with promises of legal work but were instead forced into labour without pay. Both men were convicted under the Modern Slavery Act, with sentences of eight and 10 years. The prosecution reinforced the importance of prosecuting individuals who exploit vulnerabilities, even when it involves smaller-scale trafficking operations.

R v Connors and others (2013)

The case involved a family in Leighton Buzzard, Bedfordshire, convicted of keeping vulnerable men in forced labour conditions for years. Members of the Connors family recruited homeless and vulnerable men, promising them food, shelter and work. Once under their control, the victims were forced to live in squalid conditions and work long hours with little or no pay, facing violence if they tried to leave. Several family members received prison sentences of up to six-and-a-half years. This case was one of the first major forced labour prosecutions under the slavery, servitude and forced or compulsory labour offence introduced in the Coroners and Justice Act 2009. It set a precedent for handling similar future cases.

R v Gurmeet Singh, Amarjit Singh, and Davinder Singh (Operation Span, 2012)

The case centred on a human trafficking ring in Rochdale, where girls, some as young as 12, were groomed and sexually exploited. The traffickers targeted vulnerable girls, often providing them with drugs and alcohol before coercing them into sexual acts with multiple men. The abuse went on for several years before law enforcement intervened. Several members of the gang received sentences ranging from four to 19 years for offences related to human trafficking, rape and exploitation. The case exposed major systemic failures in protecting vulnerable young people from exploitation and led to a public inquiry that recommended improvements in the child protection system and police practices.

R v James John Mulvey (Operation Hunter, 2018)

While initially an investigation into a drug trafficking network, this case also exposed significant modern slavery practices within the organised crime group. Mulvey's operations included forced labour, particularly in drug trafficking and logistics, where traffickers controlled couriers and workers through intimidation, debt bondage and threats of violence. Mulvey was convicted and sentenced to 32 years in prison for money laundering and trafficking offences. The case highlighted the overlap between human trafficking, drug trafficking and forced labour and it underscored the value of anti-money laundering laws in tackling modern slavery by targeting the finances of trafficking networks.

R v Khan and others (Operation Sanctuary, 2017)

Operation Sanctuary investigated widespread sexual exploitation and human trafficking in Newcastle. The case involved the abuse of young women and vulnerable adults who were groomed, drugged and sexually exploited by multiple men over several years. The traffickers used coercion and control tactics to isolate the victims and maintain power over them. In total, 18 people were convicted of more than 90 offences. Sentences ranged from several years to life imprisonment. The case was notable for the scale of the exploitation and it led to an in-depth inquiry into how authorities and community services could better protect vulnerable individuals from human trafficking and sexual exploitation.

R v Zakaria and Mohammed (2014)

The case involved the trafficking of a 10-year-old orphan from Nigeria to the UK for domestic servitude. The child was forced to work in the family's household without pay, deprived of education and subjected to physical abuse. After several years, she managed to escape and reported her case to authorities. The traffickers were convicted under the Modern Slavery Act 2015 and received prison sentences. This case was significant because it highlighted the issue of child trafficking and domestic servitude. It underlined the importance of identifying vulnerable children in the UK who may be victims of trafficking and exploitation.

These landmark cases demonstrate the UK's commitment to prosecuting modern slavery and human trafficking offences. They confirm the importance of the role of the Modern Slavery Act 2015 in providing a legal framework to address these crimes. The cases also highlighted systemic issues and prompted reforms in victim identification, child protection, cross-border cooperation and corporate accountability for labour practices. Each case has contributed to increasing awareness, improving victim protections and strengthening enforcement mechanisms to prevent future exploitation.

Modern slavery and people trafficking in the news

- [Dawn raid on slavery HMO](#)
- [Landmark court order against landlord turning a blind eye](#)
- [Landlord admits modern slavery charges](#)
- [Landlady ordered to compensate victim](#)

- [Landlord guilty of modern day slavery offences](#)
- [Trafficking gang jailed for slavery offences](#)
- [Trafficking women for sexual exploitation](#)
- [Landlords urged to be vigilant of criminal gangs renting to house modern slavery](#)

Case studies

Case study: Operation Brewer (2019)

Operation Brewer was a modern slavery investigation conducted in Manchester and spearheaded by the [GLAA](#) in collaboration with Greater Manchester Police (GMP) and the Department for Work and Pensions (DWP). The operation focused on identifying and dismantling labour exploitation networks that targeted vulnerable individuals trafficked for forced work under coercive and abusive conditions.

One significant outcome of the investigation was the prosecution of Nelu Nechita, a Romanian national who exploited a fellow Romanian worker. Nechita orchestrated the victim's journey to the UK by luring him with false promises of legitimate employment. On arrival, the victim was placed in a chicken processing factory in North Wales, where he worked alongside others under similar exploitative conditions.

Nechita maintained control over the victim by taking possession of his bank account, payment card and PIN and withdrawing the wages earned by the victim. For six weeks' work, the victim received just £280, while Nechita pocketed more than £1,800 in wages. Left in a foreign country without his earnings or access to support, the victim became dependent on Nechita, who also controlled the transport of the workers to ensure they remained under his supervision.

In February 2019, Nechita's exploitative practices were uncovered during Operation Brewer, leading to his arrest. Following investigations, he pleaded guilty to charges under the Modern Slavery Act 2015 for facilitating travel for exploitation. In February 2024, he was sentenced to an 18-month suspended prison term, ordered to complete 200 hours of unpaid community service and made subject to a five-year [STPO](#) to restrict his future activities and prevent further exploitation.

Lessons learned

- 1 **Importance of collaborative Investigations:** Operation Brewer highlighted the effectiveness of joint efforts between organisations like the [GLAA](#), Greater Manchester Police and the [DWP](#). Multi-agency collaboration was vital in uncovering exploitation and ensuring accountability
- 2 **Identifying financial exploitation:** the case demonstrated how traffickers exploit financial systems to control victims. Monitoring suspicious financial activity – such as unusual wage withdrawals – can help identify cases of forced labour
- 3 **Enhancing victim support systems:** the victim in this case was left isolated and vulnerable in an unfamiliar country. Providing accessible support systems – such as legal aid, shelters and multilingual services – is essential for enabling victims to seek help
- 4 **Strengthening employer accountability:** the role of employers in industries vulnerable to exploitation, like factory work, must be scrutinised. Regular

- inspections and compliance checks can help ensure workers are treated fairly and paid appropriately
- 5 **Expanding preventative measures:** Nechita's sentencing included an [STPO](#), making use of a valuable legal tool to restrict future exploitation. These kinds of tools should be used proactively to prevent repeat offences and protect vulnerable workers.

Case study: Operation Fort (2021-22)

Operation Fort is recognised as one of the largest modern slavery prosecutions in UK history. The investigation exposed the activities of two Polish trafficking rings responsible for trafficking over 400 people into the UK. Mainly vulnerable people from Poland, the victims were subjected to inhumane and exploitative conditions and forced to work in farms, factories and recycling centres for little or no pay.

Once in the UK, the victims were housed in cramped, substandard accommodation, often with multiple people crammed into single rooms without basic amenities. The traffickers confiscated their earnings and identification documents, ensuring that the victims were unable to leave or seek help. By controlling their movements and cultivating an environment of fear, the traffickers maintained their grip on the victims, who endured degrading labour conditions under constant coercion.

The investigation involved extensive cross-border collaboration between authorities in the UK and Poland, highlighting the international scope of human trafficking networks. The joint efforts led to the arrest and conviction of the gang leaders, who were sentenced to prison terms ranging from three to 11 years. The victims were rescued and provided with support for their recovery and reintegration.

Lessons learned

- 1 **Cross-border collaboration is essential:** the success of Operation Fort demonstrated the importance of cooperation between countries in tackling international trafficking networks. Sharing intelligence and resources across borders was vital in dismantling the rings and rescuing victims
- 2 **Enhancing victim identification:** many victims of Operation Fort were hidden in plain sight, working in visible industries such as recycling and farming. This highlights the need for better training for law enforcement, employers and communities to identify signs of exploitation
- 3 **Strengthening supply chain oversight:** the case illustrated the critical role of the Modern Slavery Act 2015 in requiring businesses to take responsibility for their supply chains. Companies must proactively ensure that their operations and subcontractors are free from exploitative practices
- 4 **Long-term support for survivors:** rescued victims often face significant physical and psychological trauma. Providing long-term support – including safe housing, mental health services and job opportunities – is crucial to their recovery and reintegration.
- 5 **Tackling root causes:** Operation Fort highlighted how economic vulnerability and lack of opportunities in source countries can leave individuals susceptible to trafficking. Addressing these root causes through education and employment programmes and anti-poverty initiatives is key to preventing exploitation.

Case study: Operation Aidant (2023)

Operation Aidant, conducted in 2023, was a UK-wide anti-trafficking initiative aimed at combating modern slavery, particularly forced labour and sexual exploitation. This large-scale operation uncovered extensive trafficking networks that involved both UK nationals and foreign workers, many of whom had been subjected to appalling conditions of exploitation.

Victims of trafficking were found in various industries, including car washes, nail bars and agriculture. They were coerced into gruelling work for little or no pay. Many were lured by false promises of fair employment, only to be controlled through intimidation, isolation and financial exploitation. Living conditions were often dire, with victims housed in overcrowded and unsafe accommodation. The operation revealed the extent to which organised crime had infiltrated local businesses, using them as fronts for these exploitative practices.

The operation culminated in the rescue of numerous victims and the arrest of several individuals. Those arrested faced charges related to modern slavery offences, ranging from human trafficking to forced labour and exploitation. Operation Aidant not only highlighted the scale of hidden exploitative practices within everyday businesses but also illustrated the significant role of organised crime in perpetuating these systems.

Lessons learned

- 1 **Increased public awareness is vital:** Operation Aidant demonstrated the need for greater public awareness of modern slavery. Many exploitative practices occur in plain sight, particularly in businesses such as car washes and nail bars, yet they often go unnoticed. Education campaigns can help communities identify and report suspicious activities
- 2 **Importance of multi-agency collaboration:** the success of Operation Aidant exemplified the effectiveness of coordinated efforts between law enforcement, local authorities and NGOs. Sharing intelligence and resources is crucial for tackling complex trafficking networks
- 3 **Enhanced regulation of vulnerable industries:** industries frequently associated with modern slavery, such as car washes and nail salons, require stricter regulation and oversight. Licensing schemes, regular inspections and employer accountability can help reduce the incidence of exploitation
- 4 **Victim-centred support systems:** rescued victims often suffer trauma and need long-term help, including housing, legal aid and mental health support. Strengthening these support systems is essential to ensuring their recovery and preventing re-exploitation
- 5 **Tackling the roots of exploitation:** the operation highlighted how organised crime exploits socioeconomic vulnerabilities, including poverty and lack of employment opportunities. Addressing these underlying issues is key to reducing the risk of trafficking and forced labour.

Case study: Operation Netwing

Operation Netwing uncovered one of the UK's most significant cases of modern slavery, exposing the exploitation orchestrated by the Connors family. Based in Bedfordshire, the Connors targeted vulnerable individuals, including homeless men and people with addictions. They lured their victims with promises of legitimate work, food and accommodation. However, once under their control, the victims were subjected to forced labour, physical abuse and appalling living conditions.

The investigation began after a charity worker reported suspicions of exploitation. Police were led to the Greenacres Caravan Park in Leighton Buzzard, Bedfordshire. In a raid in September 2011, law enforcement discovered 24 men living in squalid conditions. Many of the victims had been held for years. These individuals lived in dilapidated caravans without access to running water, sanitation or heating. The victims were malnourished, some with visible injuries. They had been coerced into signing over their benefits, ensuring the Connors profited from their labour and welfare entitlements.

Once under the Connors' control, the victims were forced to perform gruelling manual labour, primarily in paving and construction. They worked long hours for little or no pay. Meanwhile, the Connors family lived in relative luxury, financed by their exploitation of these people. The victims were kept in a state of fear and isolation, making escape nearly impossible. Many suffered psychological trauma in addition to the physical abuse.

The police operation led to the arrest and conviction of multiple members of the Connors family. William Connors received a sentence of six-and-a-half years for conspiracy to hold a person in servitude, while John Connors was sentenced to eight years. Other family members received varying prison terms, ranging from two to eight years. The victims were removed from the site and offered support services, including housing, medical care and counselling to help them rebuild their lives.

This case served as a powerful reminder of the importance of vigilance and collaboration in tackling modern slavery. Early intervention by a charity worker was pivotal in sparking the investigation. The efforts of law enforcement, local authorities, and NGOs demonstrated the need for cross-agency cooperation. While the Connors family faced justice, the victims' experiences underscored the lasting impact of exploitation and the need for comprehensive support systems for survivors.

Lessons learned

- 1 **Early intervention can save lives:** this case served to reaffirm the importance of frontline workers – charity workers, social services and law enforcement – recognising signs of modern slavery early. The tip-off was vital in initiating the investigation
- 2 **Cross-agency collaboration:** Operation Netwing highlighted the need for collaboration among various agencies – including law enforcement, local authorities and NGOs – to tackle complex cases of modern slavery effectively

- 3 **Enhanced support for victims:** the case underscored the importance of providing long-term support for survivors of modern slavery, addressing both physical and psychological scars
- 4 **Vigilance among property owners and employers:** landlords, employers and local residents were encouraged to report signs of exploitation, such as overcrowded living conditions and individuals appearing distressed.

Operation Netwing was a landmark case in the UK's fight against modern slavery. It exposed how organised groups exploit society's most vulnerable people and demonstrated the need for continuous vigilance, public awareness and robust support systems to help prevent this kind of exploitation.

C3: Sexual exploitation and brothels

In summary

- Sexual exploitation involves the abuse of an individual through coercion, manipulation or deception to engage in sexual activities for the benefit or gain of others, often exploiting power imbalances or vulnerabilities
- Brothels are frequently found in [PRS](#) properties and are often linked to other forms of criminality or organised crime, such as human trafficking
- Landlords may inadvertently facilitate or, in some cases, be directly involved in the operation of brothels
- Signs indicating the presence of a brothel may include a high frequency of visitors, unusual tenant behaviour and specific physical indicators in or around the property
- Tackling this serious form of anti-social behaviour requires local authorities to collaborate with other agencies effectively
- A local authority has a legal duty under section 52 of the Modern Slavery Act to notify the Home Office if any council employee has encountered anyone who they suspect may be a victim of modern slavery.

In detail

Sexual exploitation is a form of abuse where individuals are forced or coerced into sexual acts through manipulation, threats or abuse of vulnerability. This kind of exploitation is common in PRS properties and may be carried out by landlords, agents or others in positions of control.

In the UK, there is no single statutory definition of a brothel, but its meaning has been established through case law and legal interpretation. According to [section 33A](#) of the Sexual Offences Act 1956, a brothel is generally understood to be a place where two or more people offer sexual services for payment. It is an offence to keep, manage or assist in the management of a brothel. Conviction can result in up to seven years' imprisonment. This interpretation has been refined in legal cases over time. This broad definition extends from properties in which two or more sex workers work (even if they never work at the same time) to a large-scale criminal operation run by [OCGs](#), possibly involving the sexual exploitation of trafficked individuals.

Brothels can operate from rented flats, houses and [HMOs](#), as well as from commercial properties. They are illegal in the UK. Most brothels are in the PRS, which affords extra anonymity to sex workers and visiting clients. PRS properties are a good option for setting up pop-up brothels.¹³ As the name suggests, these brothels are typically short-lived: their operators move frequently to avoid detection by authorities. They are commonly associated with organised crime, including human trafficking and exploitative practices, as traffickers use them to house victims for brief periods to maximise profits and evade law enforcement.

Not all sex workers are victims of exploitation but may be at increased risk. Adult sexual exploitation is a form of sexual abuse that involves someone taking advantage

¹³ Pop-up brothels are temporary, illegal establishments set up in short-term rental properties, hotels, Airbnbs or homes to provide prostitution services.

of an adult sexually for their own benefit. Perpetrators usually hold power over their victims and may use threats, bribes and violence to coerce their victim. Sexual exploitation affects women in the main, but can affect anyone. Its meaning is broad: it can describe an isolated incident between two adults or the sophisticated actions of OCGs, where numerous adults are sexually exploited. Sexual exploitation in the PRS includes sex-for-rent cases where vulnerable individuals are coerced into unwanted sexual activity to secure access to accommodation.

Although there tends to be a controlling aspect to brothels, sex workers may also set them up to allow them to work in a safer way – by not being alone in a property with a client. If rooms or flats in one building are let separately to different individuals who offer sexual services, the premises may still count as a brothel if the individuals are effectively working together. Sex workers working from brothels in PRS properties – particularly if they are being coerced or controlled – often feel less able to report crimes committed against them to police, especially if they are not originally from this country. Brothels are considered a serious form of anti-social behaviour and are associated with many community harms.

OCGs can be involved in the running of brothels and may control many properties for brothel-keeping. Properties controlled by criminal gangs for these purposes are often also connected with drug production and distribution, property damage and other forms of anti-social behaviour. There are links between OCGs running brothels and the crimes of human trafficking and modern slavery.

- **Human trafficking** entails people being moved and forced into exploitation. This movement can be international, within the UK, local – within the same county or town – or even from one room in a property to another. A person is a victim of human trafficking as soon as they are moved for the purpose of exploitation – they do not have to have been exploited yet to be deemed a victim
- **Modern slavery** – where someone is forced to work through mental or physical threat; is owned or controlled by an ‘employer’ through mental or physical abuse or the threat of abuse; dehumanised; treated as a commodity; bought and sold as property; physically constrained; or has restrictions placed on their freedom
- **Sexual exploitation** as part of modern slavery can be ‘commercial’, where exploiters profit financially or materially, for example through prostitution or pornography. It can also be non-commercial and be a feature of other types of exploitation, such as domestic servitude. In some instances, there may be an agreement to participate in sex work but not for the type or frequency of activity they are forced to engage in.

Most foreign women trafficked into brothels in the UK come from countries in Eastern Europe, particularly Romania, as well as Albania and Hungary. Traffickers often target vulnerable individuals, luring them with false promises of legitimate work or better opportunities.¹⁴ Other victims originate from countries in Africa, Asia and Latin America. These women are transported into the UK using various routes, including airports.

¹⁴ For further detail on this, see Milad Shojaei’s blog for Human Rights Pulse, [Taking a closer look into the UK’s human trafficking crisis](#), January 2021

Pop-up brothels

Online platforms have created the opportunity for self-employed sex workers to advertise online (which itself breaks several laws) and to facilitate them moving around and renting properties from which to work.¹⁵ City centre properties may be particularly attractive as bases for pop-up operations. Brothels may be seasonal, following trends in UK holiday travel. For example, it is known that different groups of sex workers will use the same properties repeatedly for short-term lets. Using short-term lets increases the risk to sex workers who may be operating in unfamiliar localities where they do not know who the problematic, rough, abusive or dangerous clients are.

Pop-up brothels are also associated with [OCGs](#). They have been especially linked to the exploitation of vulnerable women trafficked from countries in Eastern Europe. Their characteristically temporary nature is a good operational fit for OCGs and makes it hard for agencies to identify and support potential victims of trafficking – who may also be fearful that they are at risk of deportation and may have been told that they will be viewed as offenders rather than victims.

How landlords can be involved/implicated

Landlords in the [PRS](#) may unknowingly facilitate or be directly involved in the running of brothels, often without fully understanding the legal and ethical implications.

1 Unintentional involvement

- **Lack of due diligence:** some landlords may rent out properties without thoroughly vetting their tenants. If background checks and references are not done properly, landlords might unknowingly rent to individuals or groups who then use the property as a brothel
- **Subletting issues:** in some cases, tenants may sublet a property or a room within a property to others, who then use the space for illegal activities, including operating a brothel. The landlord might not be aware of the subletting.

2 Turning a blind eye to suspicious behaviour

- **Ignoring red flags:** landlords might notice signs or receive complaints or comments from neighbours about anti-social behaviour such as frequent short-term visitors and late-night activity – signs that their property is being used as a brothel. Some may choose to ignore these signs because they do not want the inconvenience or challenge of actually dealing with the situation
- **Financial motivation:** in some cases, landlords might turn a blind eye to the activities if the tenants are paying above-market rates or consistently pay up on time. This financial motivation can lead to a situation where the landlord is complicit in the operation of a brothel.

¹⁵ Including s46 of the Sexual Offences Act 2003; s52 and s53 of the Sexual Offences Act 2003; section 19 of the Policing and Crime Act 2009; and possibly local by-laws.

3 Direct involvement

- **Facilitation or coercion:** sometimes landlords are directly involved in the operation of brothels. This might involve them facilitating the set-up, recruiting tenants or even coercing tenants into prostitution
- **Organised crime links:** some landlords may have connections with criminal organisations that are involved in human trafficking and prostitution. These landlords might rent out properties specifically for the purpose of running a brothel, sometimes under threat or duress from criminal groups. OCGs also buy up properties and launder money through them to use for illegal activities.

Impact of sexual exploitation and brothels in the private rented sector

Sexual exploitation and brothels in PRS properties (including pop-up brothels) have severe and far-reaching consequences for tenants, landlords and communities. For tenants – especially ones who are coerced or trafficked into exploitative situations – the impact is profound, as they often face physical and psychological harm, manipulation and a loss of autonomy. Victims may be trapped in unsafe living conditions and subjected to ongoing abuse. Unknowingly or knowingly complicit, landlords face serious legal repercussions, including criminal charges, property damage and potential loss of income. Additionally, pop-up brothels can lead to a rise in criminal activity (such as drug use and violence) which destabilises neighbourhoods and decreases property values. The broader community is affected too, as these exploitative practices contribute to a sense of insecurity and may harm the overall quality of life for residents in the area.

Red flags: what to look out for

Brothels are often established in PRS properties because they provide relative anonymity. OCGs buy up properties, laundering money in the process. Sometimes they will use the properties, drawing in landlords and managing/letting agents as facilitators of their criminal activities.

The business of the brothel can often go unnoticed in residential neighbourhoods. This low profile can make it difficult for landlords, neighbours and authorities to prevent, detect and address the illegal activities associated with brothels. Here are the signs to look out for:

1 Visitor activity

- Lots of people visiting the property for short periods of time and an influx of cars parked nearby may be signs of a brothel operating in the area
- Visitors may arrive at all hours of day and night, typically less frequently in the mornings
- Visitors staying for brief periods, often just 15–30 minutes
- Frequent use of taxis or ride-sharing services.

2 Visitor behaviour

- Negotiations for sexual services may be conducted in shared space or outside the property before someone is let in
- Visitors may act nervously and avoid interaction
- Visitors may be asked to use side or back entrances to avoid being seen
- Crime associated with money being in the property – criminals may target brothels in the knowledge that sex workers are unlikely to alert the police to incidents of theft, because of negative experiences in the past, lack of trust and possible fear of authorities.

3 Tenant behaviour

- Tenants who want to make rent payments in cash or pay upfront for longer periods
- Tenants rarely seen during the day or appearing to avoid interaction with neighbours
- Different people living in, or frequently coming in and out of, the property – which could indicate workers rotating their use of the property. (See [Modern slavery and human trafficking](#) for more detail.)

4 Physical signs at the property

- Minimal personal belongings and a property that is sparsely furnished with few signs of regular residential living
- Security cameras or doorbells installed in a way that suggests entry and exit are being monitored or controlled
- Unusual waste, such as large quantities of condoms, tissues and wipes
- Curtains mostly drawn or windows always covered
- Handwritten notes for visitors at the entrance
- Communal external doors regularly being left open
- Constant telephone calls or messages
- Lists tallying numbers and costs and a record of customers and earnings.

Spotting sexual exploitation (including modern slavery and human trafficking)

Brothels run by organised crime groups are often associated with human trafficking and modern slavery. This toolkit contains a section dedicated to [modern slavery](#), including a full account of signs to look out for. These include occupants:

- without access to their own passports, identification or travel documents
- who defer to a spokesperson communicating on their behalf
- who appear to be coached in what to say or do
- who do not appear to have freedom of movement or who are restricted to certain parts of the property
- who present as withdrawn or frightened
- enduring poor living conditions, possibly subject to overcrowding and subletting
- who are unaware or unsure of their location
- who are not named on the tenancy agreement
- on whose behalf another person pays the rent.

Response

It is illegal under the Sexual Offences Act 1956 to manage, keep or allow premises to be used as a brothel in the UK. Knowingly ignoring such activities or failing to take reasonable measures to address them could result in landlords being held legally accountable. Brothels are considered a serious form of anti-social behaviour. Their operation in the [PRS](#) has ramifications for communities, including noise disturbance, increased foot traffic at odd hours, anti-social behaviour and links to other criminal activities.

Beyond the legal aspects, landlords are also expected to consider the broader social impact of allowing illegal activities like prostitution – sometimes involving exploitation and human trafficking – to take place in their properties. Authorities take a serious view of landlords who are complicit in such activities, given the severe harm they can cause to both individuals and communities.

Local authority housing departments should work collaboratively with other agencies – in particular the police and victim services – to disrupt crime, hold criminals accountable and protect victims. Housing enforcement may observe indications of brothel operation or sexual exploitation during inspections, while police gather intelligence, some of it provided by local residents. Working within existing legislative arrangements, the police are focused on helping to ensure the safety of sex workers, reducing vulnerability and targeting the people who exploit or cause them harm. Sharing intelligence through multi-agency meetings allows for all organisations to have a more detailed understanding of the situation and develop coordinated strategies for a response, including joint operations.

Where [modern slavery](#) is suspected, partner agencies should work out a comprehensive response. They should recognise that, while not all sex workers are victimised by exploitation, many are vulnerable and at heightened risk of exploitation and should be assessed for safeguarding support accordingly.

Local authority housing departments can play a key role by enforcing housing and licensing regulations and working in partnership with police in the identification of brothels. They have a range of powers available to them to tackle this issue (see below).

Partners to work with

To prevent the operation of brothels and sexual exploitation of people in PRS properties, local authorities should work with a range of organisations, agencies and stakeholders to ensure a coordinated response and adequate oversight. They should consider collaborating with these partners as appropriate:

1 Law enforcement agencies

Police can provide intelligence, conduct investigations and carry out enforcement actions in property where it is suspected a brothel is operating. In cases where foreign nationals are involved, collaboration with Immigration Enforcement can help verify immigration status and identify and protect trafficked victims. The

National Police Chiefs' Council (NPCC) has issued guidance on how the police should approach sex work and prostitution. This prioritises working with partners to tackle issues associated with sex work and sharing information to improve safety.¹⁶

2 Landlord and tenant associations

Organisations such as the [NRLA](#) provide support and education for their members. Working with these groups can help raise awareness about the risk of brothel operation in the PRS and promote responsible practice that minimises their incidence.

3 Residents and management companies

Where the landlord is the owner of a leasehold flat, it is common practice for the lease to include a covenant on the prevention of the property's use for immoral purposes. Breaches of this lease can be punished with forfeiture, which means losing the lease (and therefore value of the property) as it reverts back to the freeholder. Supporting or encouraging residents to take action through management companies may be a useful tool to respond to suspected brothel operation.

4 Support services

With a focus on addressing the root causes of sex work rather than simply displacing it, partners should adopt a problem-oriented approach, centred on the welfare and vulnerability of people being exploited in the brothels business. This includes providing pathways to exit sex work when appropriate, supported by access to housing, employment, education and mental health services. Collaboration with local services such as healthcare providers, social workers and advocacy groups is crucial to creating a comprehensive support network that addresses immediate needs and helps in the development of long-term solutions.

5 Community members

Community members can help tackle brothels operating in their areas by staying vigilant and reporting any suspicious activity to local authorities or support organisations. Taxi drivers, along with delivery personnel, rideshare drivers, hotel staff, property managers and neighbours, can play a vital role in addressing issues where brothel activity is suspected.

Prevention

Preventing the operation of brothels in the PRS requires effort from both landlords and local authorities:

¹⁶ For further detail, see National Police Chiefs' Council, [Sex work: national police guidance](#), February 2024

Landlords

Landlords must be aware of the significant legal, financial and reputational risks associated with allowing a brothel to operate in their property. Beyond the potential criminal liability and harm to the community, landlords risk financial insecurity. A property's association with sex work can severely damage its reputation, reducing its marketability and long-term value, as potential buyers may be concerned about its associations with criminal activity and the stigma that the local community might attach to it. Moreover, if a landlord knowingly rents out a property previously used as a brothel without disclosing this to new tenants, the tenants may challenge the enforceability of the tenancy agreement, particularly if the property is subject to harassment or visits from former clients.

To mitigate these risks, landlords are expected to exercise due diligence, which includes:

- 1 **Conducting background checks:** verifying the identity, immigration status and income sources of prospective tenants, including ones who are self-employed
- 2 **Routine inspections:** scheduling regular property checks to identify signs of illegal activity or property misuse
- 3 **Acting promptly:** responding immediately to suspicions of unlawful activity by reporting it to the authorities and taking steps to regain control of the property.

Tenancy agreements should explicitly prohibit the use of the property for illegal or immoral purposes. Landlords may also consider adding a clause forbidding illegal activity and restricting business activities, though this could be challenging in a post-COVID era where remote working has become more common. Clear communication and careful management of tenancy terms can help landlords protect their property and prevent illegal use.

Landlords should introduce themselves to, and maintain regular communication with, people living in neighbouring properties, because they can provide valuable insights into unusual activity or potential misuse of property. Additionally, landlords should engage with fellow landlords and managing/letting agents in the local area to stay informed about trends and issues, such as properties being used as brothels. Sharing knowledge about local concerns can help landlords address problems proactively.

To further safeguard their property, landlords might consider obtaining a tenant history report. This can provide important information, including property condition during previous tenancies, lease violations, eviction records, neighbour complaints and even positive references. These steps can help landlords ensure responsible tenant behaviour and protect their properties from illegal activities.

Landlords should report any suspicions around brothel operation or sexual exploitation to the police to support intelligence gathering.

For landlords letting out a property on a short-term or holiday rental basis, some actions may deter its use for sex work. These include:

- Having a minimum rental period – for example, not allowing day lets

- Not accepting cash payment
- Only letting to guests with several positive reviews
- Having a face-to-face check-in and checkout process
- Making it clear in adverts that the owner lives close by
- Taking credit card details to secure ID – be aware of people using pre-paid cards
- Having stringent rules and regulations regarding the property
- Being aware of renters who repeatedly rent the same property
- Being aware of renters whose home address is local to the property.

Local authorities

Enforcement: local authorities must ensure landlords adhere to legal requirements, including licensing obligations. This involves monitoring compliance with standards designed to prevent the misuse of properties, such as inspections and penalties for violations. Authorities should also remain vigilant about the shifting nature of criminal activity. For instance, landlords who previously facilitated modern slavery may adapt to licensing restrictions by transitioning to short-term lettings, using their properties as brothels and renting at high profit without vetting tenants. Strengthened enforcement mechanisms and updated policies are essential to closing such loopholes. An example of this would be where a landlord changes the rental property to an Airbnb to avoid licensing or further scrutiny.

Data and intelligence sharing: local authorities have a duty to share intelligence and data when cases of sexual exploitation or brothels are discovered in PRS properties. By collaborating with law enforcement, local councils and other relevant agencies, housing associations can help identify patterns of exploitation, disrupt criminal networks and safeguard vulnerable individuals. Sharing information ensures a coordinated response to protect communities, prevent future misuse of housing stock and hold to account individuals or groups facilitating illegal activities. Proactive data sharing is also an important part of the housing sector's role in upholding public safety and combating exploitation.

Public awareness: in collaboration with the police and community organisations, local authorities should launch initiatives to raise public awareness of the hidden harms of brothel operations and sexual exploitation. These campaigns should highlight the signs of illegal activity, such as frequent short-term visitors, unusual noise patterns and distressed individuals. Empowering the community to recognise and report suspicious behaviour enhances intelligence gathering and helps authorities respond more effectively. Public awareness can also reduce the stigma around reporting and encourage collective responsibility in combating exploitation.

Sources of information

- [National Residential Landlords Association](#) (NRLA) – resources for landlords
- Ministry of Housing, Communities and Local Government – [How to rent guides](#)
- [National Ugly Mugs](#) – can assist in investigations and support victims
- [Redbridge Prostitution Slavery Pledge](#) – for private landlords
- [Release](#) – information about law relating to sex work and sex workers' rights, including those working indoors

- [Open Doors](#) – a free and confidential service in East London for people working in the sex industry
- National Police Chiefs' Council – [Sex work and prostitution guidance](#)
- Torbay and Devon Safeguarding Adults Partnership – [Signs of sexual exploitation](#)
- [The Human Trafficking Foundation](#)

Legal framework

Landlords should be vigilant in ensuring their properties are not used for illegal activities, including brothels or other forms of prostitution. The legal framework is designed to hold landlords accountable if they fail to take appropriate actions to prevent such use. In many cases, a landlord cannot simply claim ignorance of what has been going on in their property. If they should have reasonably known about illegal activities taking place on their premises, they can still be held liable. Courts in the UK have consistently held that landlords have a responsibility to ensure their properties are not used for illegal purposes.

Selling sexual services for money is legal in the UK, as is paying for sexual services, apart from in Northern Ireland. One tenant in a property working as a sex worker is legal. However, there are a number of related activities that are illegal, such as soliciting in a public place, kerb-crawling, pimping and owning or managing a brothel. Enforcement focuses on tackling exploitation, brothel-keeping and the activities of landlords, pimps and managers.

Sometimes, however, situations are not always clear-cut. Often where [OCGs](#) are involved, a number of illegal activities may be evident, some easier to prosecute than others. For example, a vulnerable person may be [cuckooed](#) or forced into sex work or a sex worker cuckooed in their own home. Legal actions for cuckooing are not as well developed as for brothels and it may be harder to spot. There is also growing evidence that some landlords and/or OCGs are moving their illegal activities into Airbnbs, where they are less regulated and observable.

Sexual Offences Act 1956

Landlords or managing/letting agents could be prosecuted if they knowingly permit brothel activity on their premises. The Act seeks to penalise anyone facilitating such activities. Provisions targeting brothel-keeping and related activities, include:

- **Section 33** which makes it an offence to keep, manage, or assist in the management of a brothel
- **Section 33a** (added later) which broadened these provisions to criminalise landlords who knowingly allow their property to be used as a brothel
- **Section 34:** which makes it 'an offence for the lessor or landlord of any premises or his agent to let the whole or part of the premises with the knowledge that it is to be used, in whole or in part, as a brothel, or, where the whole or part of the premises is used as a brothel, to be wilfully a party to that use continuing.'

Sexual Offences Act 2003

The Sexual Offences Act 2003 modernised and expanded sexual offence laws, (including ones concerned with brothel-keeping) – and in doing so provided a focus on exploitation and trafficking. Under these provisions, landlords or property managers who benefit financially from brothel activities can be prosecuted.

Key updates:

- **Sections 52 and 53** target individuals who cause, incite or control prostitution for gain. This could apply to anyone using rental properties to exploit workers in a brothel
- **The definition of exploitation** includes coercion or abuse of power for financial or personal gain.

Further information on laws about prostitution and the exploitation of prostitution can be found on the [Crown Prosecution Service](#) (CPS) website.

Modern Slavery Act 2015

Focused on tackling [modern slavery and human trafficking](#), the Modern Slavery Act 2015 addresses trafficking and exploitation, which is often linked to brothel operations. Landlords could face liability if they fail to report suspicious activities indicative of trafficking or they knowingly rent properties for the sexual exploitation of trafficked people. Key provisions include:

- **Section 1** which criminalises slavery, servitude and forced labour
- **Section 2** which covers human trafficking for purposes like sexual exploitation, a common feature of brothel-keeping
- **Section 45** which provides a defence for victims of trafficking forced to commit crimes under duress.

The Proceeds of Crime Act 2002

[The Proceeds of Crime Act](#) can be used to target profits from brothel-keeping. The Act enables the Government to seize assets obtained through criminal activity. Under POCA, landlords may also face confiscation proceedings, if it is determined that they have profited from the rent of a property used for criminal purposes like operating a brothel.

Civil remedies

Anti-social Behaviour, Crime and Policing Act 2014:

Local authorities can take action against properties which are used for activities that cause a nuisance or which are linked to anti-social behaviour. This includes the use of a property as a brothel. Civil penalties under this legislation can include fines and closure orders that prohibit the use of the premises for a finite period.

Closure orders:

A closure order can be issued by a magistrate's court to close the premises for up to three months if it is being used for activities related to prostitution or if it is a persistent nuisance.

Legal cases

Gateshead Council v Hughes (2017)

Hughes, a landlord, was prosecuted after failing to comply with the conditions of his landlord licence issued under the selective licensing scheme. The brothel operating from one of his properties came to light when a local resident complained to Gateshead Council's private sector housing team. The police were called and subsequently identified that the property was set up for sex work. Officers from the Council attempted to make contact by phone and email, asking Hughes to provide information about who was living at the address, the tenancy agreement and proof that the tenants had been vetted and reference-checked. Additionally, he was asked to provide details on how he intended to deal with the matter. When interviewed by the Council under caution, Hughes said he had been provided with a false reference and duped into offering her the property. However, he admitted that he had not carried out necessary checks, obtained proper references, completed his copy of the tenancy agreement, provided an inventory for the property or checked the smoke alarms. He pleaded guilty to failing to comply with the conditions of his licence and was fined £5,000. The Council also intended to revoke all of Hughes's licences and require that his properties be managed by a reputable local agent. Hughes was found not guilty of knowingly allowing the house to be used as a brothel.

R v Allard (2023)

Frederick Allard, a landlord from Tidworth aged 73, exploited vulnerable women seeking housing between 2019 and 2023. Allard was convicted of sexual assault and causing/inciting prostitution. He reportedly used his position as a landlord to demand sexual favours from women in exchange for reduced rent, a gross abuse of power that caused significant harm to his victims. His actions were investigated by Wiltshire Police after victims came forward. He was found guilty in May 2024 and jailed for 30 months. The case underscores the importance of vigilance and enforcement against exploitation in rented housing, particularly in the [PRS](#).

R v Feng Xu (2019)

Feng Xu, a Chinese national, was involved in a significant network of properties used for organised crime, including brothels and cannabis farms. He used multiple false identities and fraudulent documents to rent out over 446 properties across the UK. These properties were used by various criminal groups for sexual exploitation, cannabis cultivation and other illegal activities. Feng Xu's activities were uncovered through investigations involving multiple police forces and the [NCA](#), which linked his network to significant disruptions in organised crime operations. He was sentenced to seven years and four months in prison in December 2019 after pleading guilty to 22 different offences, including fraud and money laundering.

R v Shuangyan (2019)

Part of a gang that housed sex workers in Kent, Essex and London, Shuangyan was found guilty of helping to run a network of brothels from rental properties and was also convicted of money laundering. The gang used false names and posed as employees of Huawei to trick estate agents into renting flats to them. The gang had 'a number of sex workers at their disposal' who would frequently change location. The sex workers were advertised online and housed in the rented flats.

Brothels and sexual exploitation in the news

- [Man sentenced to jail for running brothel from his home](#)
- [Brothel discovered on quiet suburban street](#)
- [Two convicted for operating sophisticated brothel operation from third-party rented home](#)
- [Gang found guilty of trafficking young women to work in Swindon brothels](#)
- [Pensioner sentenced for allowing home to be used as a brothel](#)
- [Nottingham brothel raided by police as four people arrested over slavery offences](#)
- [Gangsters turn woman's luxury home into a pop-up brothel](#)
- [Pop-up brothels being set up in holiday homes, police warn](#)

Case studies

Case study: three men convicted for large-scale trafficking and sexual exploitation

In January 2025, UK authorities exposed a large-scale human trafficking and prostitution ring that operated 36 brothels across the country, including key locations in Kent, London, Bristol, Bradford, Reading and Worthing. The criminal network was orchestrated by Lina Wang from Cambridge, Chung Fu Wang from Dagenham and Yuan Hang. They were charged with controlling prostitution for gain and acquiring criminal property.

The layering of the organisation was intentionally structured to frustrate law enforcement. Many individuals involved remain unidentified or unprosecuted. The scale of the operation was vast, with multiple moving parts designed to evade detection. Identity within the network was fluid: individuals frequently changed names to confuse and deceive both the authorities and victims.

Lina Wang operated as a central hub – a 'call centre' facilitating bookings for sexual services across the brothels. Police investigations found compelling evidence that many women involved were forced or coerced into the trade. Some were subjected to unsafe sexual practices, such as being compelled to engage in acts without condoms, further highlighting the exploitative nature of the operation.

These activities first came to police attention in August 2020, when reports emerged of women being forced to have sex and being raped for money in a Canterbury property. Victims were allegedly held at gunpoint. Following this, extensive investigations – codenamed Operation Granite and Operation Emerald – uncovered

the network's reach and operational tactics. Granite identified 14 confirmed brothel sites; Emerald revealed 24 more.

Authorities found that Wang was deeply embedded in most, if not all, of these illicit enterprises. His phone data linked him directly to the management and coordination of these brothels. He owned two vehicles registered to addresses being used as brothels. Automatic number plate recognition (ANPR) footage, along with phone data, provided a record of his movements between his call centre and the various brothels under his control.

The case demonstrates how traffickers manipulate the private rented sector to facilitate criminal enterprises, while remaining elusive to law enforcement.

During a trial at Maidstone Crown Court, Judge Gareth Branston described the criminal operation as 'prostitution on a massive commercial scale'. The sophisticated and structured nature of the network highlighted its far-reaching impact on vulnerable individuals trafficked into the UK under false pretences. Conviction of the three primary defendants was based on substantial evidence, including phone records, financial transactions and witness testimonies. However, the full extent of the organisation is still not known. Authorities believe many more perpetrators played a role in running and sustaining the operation. At the time of writing, sentencing was yet to be pronounced.

Lessons learned

- 1 **Human trafficking networks** operate with highly sophisticated structures designed to evade law enforcement
- 2 **Identity manipulation and deception** are common tactics used to frustrate investigations
- 3 **The misuse of the PRS** for criminal activities highlights the need for stricter regulations and monitoring
- 4 **Effective collaboration** between law enforcement, local authorities and social organisations is essential to combat human trafficking
- 5 **Victims are often coerced** into unsafe practices, emphasising the need for stronger victim protection measures
- 6 **Intelligence gathering** through phone records, ANPR data and property monitoring is crucial in dismantling trafficking networks
- 7 **Public awareness** and reporting mechanisms play a vital role in identifying and preventing exploitation.

Case study: landlord involvement with brothels in Swindon

There have been notable cases in Swindon where landlords have been implicated, either directly or indirectly, in the use of their properties as brothels. These instances highlight the legal and social challenges surrounding this issue, particularly in the [PRS](#).

In 2017, Wiltshire Police conducted a series of raids on properties in Swindon as part of a broader effort to combat organised crime, human trafficking and exploitation linked to prostitution. These raids uncovered several properties being used as brothels, often associated with trafficking networks. Some landlords were found to have rented out

properties without adequate tenant checks, making them inadvertently complicit in illegal activities. In other cases, landlords knowingly rented properties for such purposes, incentivised by higher-than-market rental income.

As a result, police actions led to the closure of several brothels and the arrest of individuals involved in trafficking and exploitation. While the specific prosecution of landlords was not heavily publicised, the operation served as a warning to landlords about the importance of due diligence and the risks of ignoring illegal activities on their properties.

In 2019, a Swindon landlord faced legal action after it was discovered that their property was being used as a brothel. The landlord had been informed by neighbours and local authorities about suspicious activities at the property but failed to take any action. Frequent visits by different men at odd hours raised concerns among neighbours, yet the landlord did not evict the tenants or report the activities to authorities. Police eventually raided the property and confirmed its use as a brothel. The landlord faced prosecution under the Sexual Offences Act for permitting their property to be used for prostitution. This case underscores the legal responsibility of landlords to act when they become aware of illegal activities and the consequences of failing to do so.

In 2020, Wiltshire Police intensified efforts to tackle illegal brothels in Swindon, focusing on brothels linked to human trafficking. Authorities collaborated with landlords to educate them on the signs of brothels and the importance of reporting suspicious activities. Despite these efforts, some landlords were found to have rented properties to criminal organisations operating brothels, often without conducting sufficient tenant vetting. The crackdown resulted in some landlords facing investigations and properties being issued closure orders.

These cases illustrate the vital importance of vigilance for landlords in monitoring how their properties are used. The police emphasised the crucial role landlords play in preventing their properties from being used for criminal purposes and the severe consequences of neglecting this responsibility. Landlords who fail to act on knowledge of illegal activities, such as the operation of brothels, risk legal consequences, including prosecution under the Sexual Offences Act. Beyond legal liability, the presence of brothels can harm local communities by increasing crime and social unrest, damaging the reputation of both landlords and the neighbourhood.

To avoid these pitfalls, landlords must collaborate closely with authorities, conduct thorough tenant vetting and perform regular property inspections. Swift action on any reports of suspicious activity is necessary for the proper discharge of their legal and ethical obligations.

Lessons learned

- 1 **Conduct thorough tenant vetting:** landlords must carry out proper background checks on potential tenants to ensure they are legitimate and unlikely to use the property for illegal activities
- 2 **Monitor property usage regularly:** routine inspections and maintaining a visible presence can help landlords detect signs of misuse early

- 3 **Act on suspicious activity:** ignoring complaints or signs of illegal activities – such as frequent late-night visitors or concerns raised by neighbours – can have legal repercussions
- 4 **Collaborate with authorities:** landlords should work closely with local councils and police, report suspicious activities promptly and seek guidance when in doubt
- 5 **Self-educate on legal obligations:** understanding laws like the Sexual Offences Act and how they apply to landlords can help avoid unintentional complicity in illegal activities
- 6 **Include protective clauses in lease agreements:** explicitly prohibiting illegal activities, including the use of the property as a brothel, can provide a strong legal basis for evictions, if needed
- 7 **Respond proactively to community concerns:** taking complaints from neighbours or the community seriously can prevent escalation and protect landlords from reputational damage.

C4: Rent-to-rent scams

In summary

- A rent-to-rent scam occurs when an individual or organisation sublets a property under false pretences
- Managing agents often carry out such scams without the landlord's knowledge
- Rent-to-rent scams succeed by obscuring responsibility
- Tenants may have few legal protections and risk eviction through the scam
- Airbnbs and other short-term rental platforms are increasingly being used by rent-to-rent scammers.

In detail

Genuine rent-to-rent business models have been around for several decades in various forms, often aligning with traditional property management and leasing arrangements, where one party leases a property and then sublets it to others. While they can be legitimate and mutually beneficial, they must be conducted transparently and with the full knowledge and consent of the original property owner.

In contrast, rent-to-rent scams exploit this business model by manipulating legal grey areas and obscuring financial records. A rent-to-rent scam occurs when an individual or organisation rents out a property under false pretences. It may be sublet with or without permission, but the criminality occurs when that agent creates an overcrowded, unlicensed [HMO](#), charging high rents to unsuspecting tenants. These fraudulent practices leave tenants with few legal protections and at risk of sudden eviction, while the scammer exploits the property and misleads both the landlord, tenants and others.

There are three main types of scams in operation:

- 1 Schemes where the owner lets to tenants who then sublet the property without permission, posing as the landlord to unsuspecting subtenants
- 2 Schemes where the owner lets to a property management company that takes over the lease and lets to tenants who then pose as the landlord and sublet the property
- 3 Schemes where owners let to property-to-property management companies in exchange for that company guaranteeing a certain level of rent to the owner and the property management then sublets rooms and makes more money, pocketing the difference for themselves.

The third category is by far the most common type of rent-to-rent scam, accounting for approximately 58% of such schemes in the UK.¹⁷ Property management firms enter into agreements with landlords, promising a guaranteed rental income in exchange for taking over the property. However, these companies often exploit the arrangement to maximise their own profits, leaving landlords and tenants exposed to financial and legal risks.

¹⁷ Based on the intervention witness statement of Ben Reeve-Lewis (Safer Renting) to the Supreme Court in the *Rakusen v Jepson* case in January 2023, specifically paras 5 – 11.

Many of these firms lack the financial stability to honour their commitments to landlords and when they face monetary shortfalls, they resort to exploitative tactics. Commonly, they delay payments to landlords, offering excuses such as late payments from tenants or unexpected maintenance expenses. In more extreme cases, the companies stop paying landlords entirely, even though they continue collecting rent from subtenants. This leaves landlords financially stranded, often with no immediate recourse to recover their losses.

To further increase their profits, these companies frequently operate the property as an illegal HMO, often without the landlord's knowledge or consent. They overcrowd the property by converting common areas, such as living rooms or dining rooms, into additional bedrooms. By renting to multiple tenants from separate households, they can significantly increase the rental income. For example, while the landlord may receive £1,500 per month as agreed, the company collects £3,000 or more from subtenants and pockets the surplus profit. This practice violates housing laws, as these set-ups typically operate without the required HMO licence and do not meet legal safety thresholds, for example in the provision of fire doors and adequate facilities. Where they are not required to have a licence, HMOs are still subject to management regulations and legal standards.

These companies also exploit tenants by prioritising high turnover to generate additional fees. They often target short-term tenants, such as students or temporary workers, levying moving-in and administration fees. This constant turnover accelerates wear and tear on the property and undermines its long-term stability. Tenants, who are often unaware of the scam, may end up living in overcrowded and unsafe conditions, with limited recourse if the property management arrangement collapses.

The consequences of these scams are severe for all parties involved. Landlords face unpaid rent, potential legal penalties for licensing and safety violations and the financial burden of repairing damages caused by overcrowding or mismanagement. Tenants, meanwhile, endure unsafe living conditions and the risk of sudden eviction. By prioritising their own profits over legal and ethical responsibilities, these property management firms exploit both landlords and tenants, making this one of the most harmful forms of rent-to-rent scamming.

Rent-to-rent scams have grown considerably over the last decade,¹⁸ taking advantage of the rising appeal of making money from property without actual ownership.¹⁹ The exponential growth of this model has been fuelled by how-to information made available through manuals, online tutorials and workshops. It has become a complex industry where legitimate and illegitimate practices intertwine, often leaving landlords and tenants uncertain about who is really responsible for their contracts.

Airbnbs and other short-term rental platforms can also be linked to rent-to-rent scams when unscrupulous individuals or companies exploit the system to generate profits at

¹⁸ See for example BBC News, [London renting: 'We lost £13,000 in a fake agent scam'](#), 28 September 2023

¹⁹ See sba Property Management blog, [Price hikes, fake images and virtual viewings: six red flags to help you avoid a rental scam](#)

the expense of landlords, tenants and local communities. These are linked to rent-to-rent scams when individuals or companies rent a property from a landlord under the guise of providing long-term tenants but instead list it on short-term rental platforms like Airbnb without the landlord's knowledge. The fraudster markets the property to tourists, charging higher nightly rates than the landlord's agreed rent, while violating tenancy agreements that prohibit subletting for commercial purposes. This leads to property damage due to high turnover and neglect, and the scammer often ignores local regulations, putting the landlord at risk of fines and legal action. Landlords are left responsible for repairs and legal fallout, while the fraudster profits from the difference.

Rent-to-rent scams thrive on creating confusion and obscuring accountability, making it difficult for landlords, tenants and local authorities to track who is responsible. These operators often avoid formal tenancy agreements, neglect issuing rent receipts and intentionally leave minimal paper trails, complicating enforcement and tax investigations. To pursue action, landlords and local authorities first need to identify the individuals or entities behind the operation, a challenging task in a system designed to be opaque. Landlords may live abroad and tenants may only know them by their first name. As these scams persist, they are likely to contribute to declining housing standards, with tenants left vulnerable to overcrowded, poorly maintained properties and at higher risk of illegal evictions.

How landlords can be involved/implicated

While there are some landlords and managing/letting agents who intentionally set up to undertake rent-to-rent scams, others can fall prey to involvement or implication in such schemes, often through being unaware or poorly informed. They may unintentionally facilitate rent-to-rent scams or fail to prevent them due to lack of oversight, leaving both tenants and the broader rental market vulnerable to exploitation.

Here are some ways landlords or managing/letting agents might knowingly or unknowingly become involved:

1 Unknowingly renting to scammers

- **Lack of vetting:** some scammers provide false documents or credentials to secure a property. Therefore, landlords or agents who do not thoroughly vet the initial renter can unknowingly lease to these fraudsters
- **No regular inspections:** by not conducting routine inspections, landlords may be unaware that their property is being sublet illegally, sometimes to multiple tenants who may be living in poor conditions.

2 Knowingly participating in illegal subletting

- **Willing collusion:** some landlords or agents might be aware of the rent-to-rent scheme and choose to ignore it, particularly if the initial tenant offers to pay an inflated rental rate upfront

- **Abusing loopholes:** unscrupulous landlords may engage with rent-to-rent schemes to bypass local regulations on multi-occupancy housing or licensing requirements.

3 Poor oversight of managing/letting agents

- **Allowing agent too much control:** some landlords allow agents complete control over their properties on the assumption they will carry out their duties and manage tenants legally. However, if the agent is criminal or negligent, they might engage in rent-to-rent schemes to maximise their profits, often subletting the property without the landlord's knowledge or consent
- **Agents who encourage rent-to-rent models:** some managing/letting agents promote rent-to-rent models to landlords under the guise of 'hands-off' management. This approach can be profitable for the agent while allowing exploitative practices.

4 Using unlicensed rent-to-rent operators

- **Lack of licensing checks:** some landlords might partner with unlicensed operators to manage subletting without verifying their legitimacy. Such operators can overcrowd the properties or house tenants in unsafe conditions, leading to legal liability for the landlord if discovered.

5 Neglecting clear agreements and due diligence

- **Unclear lease agreements:** landlords who fail to include no-subletting clauses in lease agreements may unknowingly give rent-to-rent scammers an opening
- **Few or no background checks:** renting to individuals or organisations without verifying references, financial status or operational legitimacy can facilitate scams. For example, scammers might pose as 'property managers' and exploit the lack of due diligence.

6 Allowing 'rent guarantees' as a selling point

- **Rent guarantees:** some agents or rent-to-rent companies attract landlords by promising a 'guaranteed rent' level at above-market rates. This tactic can be enticing for landlord investors, but can lead to subletting at unsustainable rates, overcrowding and other forms of misuse in order to maintain profitability.

Impact of rent-to-rent scams

Rent-to-rent scams have a serious impact on tenants, landlords and the wider rental market. For tenants, the consequences can be devastating, as they may pay rent to scammers who have no legal right to sublet the property, only to find themselves facing eviction or being stranded without a home. They often lose their deposits and financial investments, while also having to deal with the emotional distress of being deceived and homeless. For landlords, these scams can lead to significant financial and legal problems, as they may be unaware their property is being sublet, resulting in breach

of contract, damage to the property and potential loss of control over tenants. The wider rental market is also affected, as such scams undermine trust and make it harder for legitimate landlords and tenants to navigate the sector, potentially driving up costs and decreasing the availability of safe and secure rental properties.

Red flags: what to look out for

In the rent-to-rent market, identifying [red flags](#) early can make the difference between a successful investment and costly mistakes. The key indicators to look out for include:

- **Unusually low rent:** if the rent is significantly lower than similar properties in the area, it could be a scam
- **Pressure tactics:** scammers may employ high-pressure sales tactics, often creating a sense of urgency to persuade people into making quick decisions or paying deposits or rent quickly before they have time to verify the legitimacy of the rental
- **No viewings allowed:** if the 'landlord' refuses to let anyone view the property before paying, this is a major red flag
- **Untraceable payments:** be wary of anyone asking for payment in cash, wire transfers, cryptocurrency or untraceable payment methods like gift cards. Receipts may also not be provided
- **Lack of proper documentation:** scammers may provide inadequate, fake or no lease agreements or they might avoid signing any formal documents. Getting receipts for payments might also prove difficult
- **Unclear ownership:** the person or company offering the property might be unable to provide proof of ownership or authorisation from the property owner to sublet
- **No clear contact information:** difficulty in contacting the person or organisation responsible for the property or lack of a professional website or contact details can be a sign of a scam
- **Conflicting information:** if there are discrepancies or confusion about who owns or manages the property, this could be a sign of a scam
- **Unusual arrangements:** if the arrangement seems informal or unprofessional, or if the property management practices are not in line with standard procedures, it indicates a scam
- **Access issues:** difficulty accessing the property or irregularities with property viewings may indicate that the person offering the property does not have legitimate control over it
- **Lack of online presence:** a legitimate property management company or landlord typically has a professional online presence. A lack of online information or social media presence can be a red flag.

Response

When a local authority becomes aware of a rent-to-rent scheme operating illegally in the PRS area, they have several tools to address the issues and protect tenants and landlords. Some common actions they can take are:

- 1 **Property inspection and HMO enforcement:** if the property is overcrowded or operating as an unlicensed [HMO](#), the local authority can inspect it to assess compliance with health, safety and HMO management regulations and occupancy conditions. If it meets the criteria for a licensed HMO, the team can insist that the operator applies for an HMO licence or face penalties.
- 2 **Improvement notices:** if the property fails to meet health and safety standards, enforcement officers can issue improvement notices to the rent-to-rent operator or landlord. This legally obliges them to make repairs or improvements within a specified timeframe, addressing issues like fire hazards, sanitation and structural concerns.
- 3 **Civil penalties and prosecution:** for serious breaches – such as failing to obtain an HMO licence or violating housing standards – the PRS team can impose substantial civil penalties or even pursue prosecution, which could lead to further fines or legal repercussions.
- 4 **Rent repayment orders (RROs):** if the rent-to-rent operator has illegally profited by operating an unlicensed HMO, the local authority can support tenants or landlords in applying for an RRO, which allows them to reclaim up to 12 months' rent.
- 5 **Banning orders:** although a difficult option in reality, in cases of persistent or severe non-compliance, the PRS enforcement team can apply for a banning order to prevent the offending rent-to-rent operator from managing or letting properties in the future.

The local authority can also collaborate with Trading Standards to tackle illegal rent-to-rent schemes more effectively using a combination of their expertise and enforcement powers. Trading Standards teams are experienced in dealing with deceptive business practices and can support local authority enforcement by:

- 1 **Investigating fraudulent business practices:** Trading Standards can investigate rent-to-rent operators who use misleading advertising, such as falsely presenting themselves as landlords, guaranteeing rent without the means to pay or promising services they do not deliver. They can scrutinise companies for fraudulent practices under consumer protection laws, adding a layer of enforcement.
- 2 **Enforcing consumer protection and fair-trading laws:** many rent-to-rent scams involve violations of Consumer Protection regulations, such as providing inaccurate information about the property, misrepresenting tenancy agreements or unfairly withholding deposits. Trading Standards can act against these violations, issuing fines or pursuing legal action to protect tenant and landlord rights.
- 3 **Conducting joint inspections and sharing intelligence:** joint property inspections allow Trading Standards and PRS teams to gather comprehensive evidence on illegal activities like overcrowding, health and safety violations and fraudulent documentation. Intelligence sharing between departments helps

identify operators who repeatedly breach housing and consumer laws, enabling more coordinated action – especially when the Trading Standards intelligence database (IDB) system is used by both agencies.

- 4 **Applying for banning orders and prosecutions:** when a rent-to-rent scheme involves serious or repeated violations, Trading Standards and PRS teams can work together to apply for banning orders that prohibit criminal operators from managing or letting properties. Jointly building a case strengthens the evidence for prosecution, making it more likely that courts will impose penalties or even issue custodial sentences.
- 5 **Educating tenants and landlords:** Trading Standards and PRS teams can collaborate on public awareness campaigns to educate tenants and landlords about their rights and the risks of rent-to-rent schemes. This proactive approach can reduce demand for unlicensed or unregulated rent-to-rent set-ups and empower individuals to report suspicious practices.

However, enforcing actions against illegal or exploitative rent-to-rent schemes can face several challenges:

- **Difficulty identifying responsible parties:** rent-to-rent operators often use complex and opaque business structures, making it difficult for enforcement teams to identify who is responsible. Operators might use shell companies, false identities or intermediaries to obscure ownership and management, which delays or even halts enforcement efforts
- **Lack of documentation:** to evade detection, many rent-to-rent schemes avoid formal tenancy agreements, rental receipts and clear paperwork. This lack of a paper trail complicates gathering evidence for violations, making it harder for authorities to prove illegal occupancy
- **Tenant reluctance to cooperate:** tenants in illegal or overcrowded rent-to-rent set-ups may fear eviction, lose their security deposits or even face deportation if they are undocumented. As a result, they may be unwilling to cooperate with authorities, limiting the evidence and witness statements needed to build a strong case
- **Resource constraints:** enforcement teams often have limited resources and must prioritise their actions. Complex rent-to-rent schemes may require significant time and staff resources, which may not always be available
- **Legal loopholes and appeal processes:** some operators exploit legal grey areas and loopholes in housing law, making it difficult for authorities to act swiftly. Even when action is taken, operators can often appeal fines or penalties, prolonging the process and creating further delays in enforcement.

Although enforcement actions aim to protect tenants' rights, uphold housing standards and deter future illegal or exploitative activity, these challenges collectively may make it difficult sometimes for local authorities to shut down illegal rent-to-rent schemes effectively.

Partners to work with

To prevent and manage rent-to-rent scams effectively, local authorities should work with [a range of organisations and stakeholders](#) to ensure a coordinated response and adequate oversight. Consider collaborating with:

1 Law enforcement agencies

- **Police and fraud investigation units** can help in investigating and prosecuting fraudulent activities associated with rent-to-rent schemes
- **Action Fraud** is the UK's national reporting centre for fraud and cybercrime and provides a streamlined way for landlords and tenants to report scams.

2 Trading Standards

- **Local Trading Standards officers** investigate cases where landlords, managing/letting agents or tenants are misled, ensuring compliance with fair-trading laws and identifying fraudulent behaviour.

3 Managing/letting agents and industry bodies

- **Local authorities** should engage with reputable managing/letting agents who can alert them to suspicious activities about rent-to-rent scams which might be operating in their area
- **Industry bodies** like Safeagent run an accreditation scheme for lettings and management agents operating in the PRS, so they meet strict compliance criteria to provide reassurance to landlords and tenants. They set standards and codes of conduct for managing/letting agents, encouraging vigilance and best practice.

4 Landlord and tenant associations

- Organisations such as the **National Residential Landlords Association** (NRLA) and **Generation Rent** (a tenant advocacy group) provide support and education for their members. Working with these groups can help raise awareness about rent-to-rent scams and promote responsible renting practices.

5 Citizens Advice and Housing Charities

- Groups like **Citizens Advice**, **Shelter** and **Crisis** provide support to tenants and landlords affected by scams. Local authorities can work with these organisations to guide individuals on legal rights and recourse in cases of fraud.

6 The Property Ombudsman (TPO)

- The TPO offers a free, independent complaints process for tenants and landlords dealing with managing/letting agents. Local authorities can refer complaints to the TPO and work with them to monitor and address systemic issues.

7 HM Revenue and Customs (HMRC)

- By coordinating with HMRC, local authorities can address cases where rent-to-rent operators avoid tax obligations, a common feature of fraudulent operations.

By partnering with these organisations, local authorities can create a strong network of support, enabling them to prevent rent-to-rent scams more effectively and protect both landlords and tenants from exploitation.

Prevention

Preventing rent-to-rent scams requires a collective effort from landlords, tenants and local authorities. Below is a checklist of how each group can contribute.

1 Landlords:

- **Vetting tenants and agents:** landlords should thoroughly vet tenants and any third-party agents who may sublet properties. This includes verifying references and the financial stability and business legitimacy of anyone leasing for rent-to-rent purposes
- **Clear contracts:** landlords should ensure tenancy agreements clearly state subletting policies and rental terms and detail penalties for unauthorised subletting in lease agreements
- **Regular property Inspections:** landlords should conduct regular checks on properties to identify any unauthorised sublets or overcrowding, potentially stopping scams before they escalate
- **Work with reputable agents:** landlords should only work with licensed and reputable managing/letting agents and regularly review their management practices.

2 Tenants:

- **Due diligence:** tenants should verify the legitimacy of their landlord or agent by checking their details on government portals or official property websites. They should also ask for proof that the landlord is the legitimate owner or has permission to sublet
- **Awareness of warning signs:** tenants should be aware of red flags, such as unusually high rent, requests for large upfront payments, pressure to move quickly, a landlord's reluctance to provide proper documentation and unverifiable contract details.

3 Local authorities:

- **Enforcement of laws:** local authorities need to ensure that landlords comply with legal requirements such as licensing and that tenancy laws are followed to prevent unauthorised subletting
- **Public awareness campaigns:** local authorities can partner with other organisations – such as consumer protection groups and the police – to run awareness campaigns about rent-to-rent scams, helping tenants and landlords recognise and report fraudulent practices
- **Stronger penalties:** authorities can increase penalties for illegal subletting and fraudulent practices to deter scammers from operating in their rental market.

Together, these measures can help minimise the risks of rent-to-rent scams, ensuring a safer rental environment for everyone involved.

Sources of information

- Ministry of Housing, Communities and Local Government – [How to rent guides](#)
- [Action Fraud](#) – report a rental fraud
- [Safer Renting](#) – safer renting guides
- [Citizens Advice](#) – offers advice on tenancy agreements
- [Shelter](#) – provides guidance on tenants' rights
- [Crisis](#) – provides support and guidance to tenants
- [National Residential Landlords Association](#) – resources for landlords
- [Which? Consumer Rights](#) – consumer advice on renters' rights and [spotting rental scams](#)

Legal framework

There are several laws and regulations that address issues found in rent-to-rent scams in the [PRS](#). While not always specifically targeting rent-to-rent arrangements, these laws aim to protect tenants and landlords from fraudulent practices and misuse of rental properties. Key legal protections include:

Landlord and Tenant Act 1985

This Act requires landlords to provide and maintain rental properties in good repair and ensure they meet basic safety and habitability standards. It also prohibits unauthorised subletting. In rent-to-rent scenarios, subletters (who may not be aware of their responsibilities) sometimes neglect these obligations, leading to unsafe or overcrowded living conditions.

Housing Act 2004 (HMO Regulations)

This legislation established the regulation of [HMOs](#), requiring properties with multiple, unrelated tenants to meet specific safety and occupancy standards. Many rent-to-rent properties qualify as HMOs but can be rented without obtaining the required licences. HMO licensing requires compliance with safety standards (such as fire safety measures and proper sanitation). Compliance failure can lead to fines and legal consequences for the landlord. Where landlords of HMOs are not required to obtain a licence, they are still subject to management regulations and legal standards to ensure tenant safety and property maintenance and any breaches should be acted on straightaway.

Consumer Rights Act 2015

The Consumer Rights Act establishes fair, transparent terms in rental agreements, how to seek redress and consumer protection against misrepresentation. In rent-to-rent arrangements, tenants are not always aware that they are not directly renting from the legal property owner, which can lead to confusion about their rights. Misleading or hidden information, such as the nature of the rental arrangement or unfair fees, can violate this legislation.

Protection from Eviction Act 1977

The Protection from Eviction Act protects tenants from illegal eviction and harassment, including those subletting without direct knowledge of the property's status. If a rent-to-rent scam results in the sudden eviction of subtenants, this law provides them with some legal recourse. These include: filing a claim against the landlord for illegal eviction and harassment; obtaining an injunction to regain access to the property; and seeking compensation for damages, including the value of any lost belongings and the cost of alternative accommodation.

Fraud Act 2006

The Fraud Act 2006 helps protect against rent-to-rent scams by making it illegal to deceive others for financial gain. In these scams, fraudsters may lie about their right to rent a property or hide important details, most notably that they do not have permission to sublet. The Act covers false representation (claiming authority to sublet), failing to disclose important information and abusing a position of trust (e.g. agents secretly subletting). Violators can face serious penalties, including imprisonment, fines or both, helping protect both landlords and unsuspecting tenants from financial loss and legal issues.

Tenant Fees Act 2019

The Tenant Fees Act protects tenants from rent-to-rent scams by banning excessive or hidden fees that scammers often charge. These fraudulent schemes might involve unauthorised agents or landlords demanding high upfront payments for things like 'service fees' or deposits, which the Act now limits. It only allows specific fees to be charged. These must be clearly stated in the rental agreement. This transparency helps prevent scams and gives tenants the right to challenge any unlawful charges. If tenants are tricked into paying illegal fees, the Act provides grounds for seeking refunds or redress.

These laws create a framework that protects tenants and ensures rent-to-rent schemes are legally compliant. While they offer recourse for landlords and tenants, proving fraud or unauthorised subletting can be complex. In Appendix A, [Subletting in rent-to-rent scenarios](#), Ben Reeve-Lewis exposes the extent to which scammers can weave complex subletting arrangements to obfuscate their standing in relation to the law. Local authorities are increasing efforts to tackle rent-to-rent scams by improving enforcement and raising awareness through education and campaigns.

The Renters' Rights Bill, currently under review, is expected to have a significant impact on tackling rent-to-rent scams. One of its key proposals is the creation of a digital property portal that will make it easier for tenants and landlords to access information on properties and landlords' obligations. This could help reduce fraudulent schemes by increasing transparency. Additionally, the Bill strengthens tenants' rights by abolishing no-fault evictions, making it harder for unscrupulous landlords or operators to evict tenants at will, which could be crucial in cases where rent-to-rent scammers are involved. Moreover, the introduction of a new ombudsman for the

private rented sector will offer tenants a clear route for dispute resolution, potentially addressing issues stemming from rent-to-rent fraud more efficiently.²⁰

Legal cases

Below are some key English legal cases involving rent-to-rent scams, highlighting issues around unauthorised subletting, tenant rights, landlord protections and enforcement of housing standards.

Rakusen v Jepson (2021)

Tenants sought an [RRO](#) against Rakusen, the property owner, after discovering their home was an unlicensed HMO. Rakusen had leased the property to a rent-to-rent company, which sublet it to the tenants without obtaining the required licence. The Upper Tribunal ruled that RROs could only be made against the 'landlord' who directly received rent from the tenants. Since Rakusen received rent from the rent-to-rent company, not the tenants, he could not be held liable. This decision clarified that property owners are not responsible for RROs in such cases, focusing liability on intermediary rent-to-rent operators. However, this decision and its consequences did not go unnoticed by the drafters of the Renters (Reform) Bill (as named at the time). The Bill's proposed provisions include an increase in possible RROs to two years and the ability to pursue an RRO directly against a director of a rent-to-rent management company – also, reversing the Rakusen decision, the ability to pursue an RRO directly against the property owner, which should be persuasive in encouraging due diligence before handing over management responsibility.²¹

Kassam v Gill (2021)

This case involved a tenant who signed a lease with the intent of subletting the property to others without the landlord's knowledge. The tenant misrepresented their intentions to the landlord and then set up a subletting business. When the landlord discovered this, they pursued legal action to regain control of the property. The court ruled in favour of the landlord, having determined that the tenant had breached the terms of the tenancy agreement by subletting without permission. This case reinforced the legitimacy of landlords terminating leases where tenants engage in unauthorised rent-to-rent schemes.

Marrable v Frogmore Property Investments Ltd (2022)

In this case, it was discovered that a rent-to-rent operator had misrepresented their intentions and failed to disclose their plans to sublet. They also failed to meet financial obligations to the landlord. The court invalidated the operator's lease, highlighting that operators must be transparent and upfront about their business plans. The landlord was able to terminate the agreement due to misrepresentation.

²⁰ See [Renters' Reform Bill](#)

²¹ Renters' Rights Bill comments added by Ben Reeve-Lewis, Safer Renting

Birmingham City Council v Padda (2011)

This case centred around an unlicensed [HMO](#) managed under a rent-to-rent arrangement. Acting as a rent-to-rent operator, the tenant leased a property and then sublet it as an HMO without obtaining the necessary licence. This led to overcrowding and poor living conditions. Birmingham City Council took enforcement action. The court fined the tenant under the Housing Act 2004 for operating an unlicensed HMO.

Rogerson v Bolsover District Council (2019)

In this case, the landlord leased a property to a tenant who then used it as a rent-to-rent HMO without proper fire safety measures or an HMO licence. A fire broke out, leading to dangerous conditions for subtenants. The local council took legal action against both the landlord and tenant for violating housing safety standards. The court imposed penalties on both the landlord and the rent-to-rent operator. This case clarified that landlords might share liability for housing violations even if they are not directly managing the property – highlighting the need for landlords to ensure that any subletting is properly regulated and licensed.

Sheffield City Council v Rehman (2018)

In Sheffield, a rent-to-rent operator sublet properties without the landlord's consent, often overcrowding them and neglecting property maintenance. Complaints from subtenants about poor living conditions prompted an investigation by Sheffield City Council. The court ordered substantial fines under the Housing Act 2004, reinforcing the authority of councils to take action against rent-to-rent operators who fail to maintain safe and habitable housing standards.

City of Westminster v Hussein and others (2011)

This case involved multiple rent-to-rent properties in London where subletting arrangements led to severe overcrowding and poor conditions, including fire hazards. The rent-to-rent operators rented properties from landlords, then sublet them without consent. The court imposed penalties under HMO and housing regulations.

Waltham Forest LBC v Khan (2017)

Khan, a rent-to-rent operator, leased properties and then sublet them without meeting HMO licensing requirements. The properties were found to be overcrowded and in disrepair. Waltham Forest Council took legal action to enforce HMO and safety standards. The court fined Khan and ruled that the rent-to-rent operator was liable for the property's condition under HMO regulations.

R v Adams (2021)

The defendant, Adams, posed as a legitimate tenant and rented a property. Without the owner's knowledge, he then sublet the property to multiple tenants, collecting substantial deposits and upfront rent payments. When the subtenants arrived to move in, they found the property already occupied or discovered that the original landlord had no idea of their tenancy agreements. The court found Adams guilty of fraud under

the Fraud Act 2006, as he intentionally misrepresented his authority to sublet the property.

Smith v Green & LettingCo (2019)

Green posed as the landlord of a property which was listed on Rightmove and marketed by LettingCo. Green offered an attractive rental rate, demanding large upfront payments from Smith and other prospective tenants. The court found Green liable for fraud, while LettingCo was scrutinised for failing to verify Green's ownership.

Key themes from the cases

- Rent-to-rent operators often breach tenancy agreements by subletting without landlord consent
- Many rent-to-rent operators misrepresent their intentions, leading to unauthorised subletting and overcrowding
- Rent-to-rent schemes frequently neglect HMO licensing and safety standards, risking tenant safety
- Both landlords and rent-to-rent operators can be held liable for inadequate housing conditions and legal non-compliance
- Subtenants in rent-to-rent arrangements are entitled to protection from unsafe conditions and illegal evictions.

These cases demonstrate the legal responsibilities of rent-to-rent operators and highlight the importance of landlord vigilance, tenant protections and local council enforcement in preventing illegal subletting and maintaining housing standards.

Rent-to-rent scams in the news

- [The dark world of rent-to-rent scams](#)
- [Evicted and lost £20,000 in a rental scam](#)
- [Trio of landlord scam victims come forward](#)
- [Landlord catches Influencer tenant renting out her rental home](#)
- [Rent-to-rent, the latest property get-rich-quick scheme](#)

Case studies²²

Case study: unlicensed HMO and landlord exploitation

A four-bedroom family house was occupied by 10 people, creating a mandatory [HMO](#) that was unlicensed. On discovering the situation, the local council contacted the property owners, who denied any knowledge or responsibility. They claimed the property was under the control of an agent and provided the names of two company officers.

The agents, however, attempted to evade accountability. They dishonestly informed all the residents that the council planned to close the property, instructing them to vacate within a week and claiming the locks would be changed. This would have

²² Kindly provided by Ben Reeve-Lewis, Safer Renting

constituted illegal eviction. However, on the day of the supposed eviction, all the residents sought assistance, confirming that the two individuals named by the owners were, in fact, their landlords. They revealed that they paid rent directly to these men. When the residents presented their tenancy agreements, it became evident that each had been issued contracts by the same two men. However, the agreements listed different non-existent companies as landlords. This deceitful tactic was used to obscure the true management and ownership of the property.

Further investigations revealed that the property owners operated a builders' merchant shop directly across the street from the house. Despite their denials, they would have had a clear view of the property and the numerous people entering and leaving over the two years the house had been operating as an HMO.

Lessons learned

- 1 **Accountability in property management:** this case highlights the need for stringent checks and clear accountability when property owners claim to delegate management
- 2 **Preventing illegal evictions:** the dishonest attempt to force residents out underscores the importance of protecting tenants from unlawful eviction practices
- 3 **Tenancy agreements as evidence:** the fraudulent use of fake companies as landlords illustrates the need for careful scrutiny of tenancy agreements and reinforces the importance of educating tenants about their rights and providing access to legal support
- 4 **HMO licensing enforcement:** unlicensed HMOs pose significant risks to tenant safety and wellbeing. Robust systems are required to identify and regulate HMOs, ensuring compliance with licensing laws
- 5 **Collaboration between agencies:** effective communication and coordination between councils, legal services and housing enforcement teams are essential to help uncover and address illegal practices
- 6 **Role of neighbours and community awareness:** observant neighbours or local businesses can play a role in identifying overcrowded or unlicensed properties. Awareness campaigns could encourage community reporting.

Case study: unlicensed HMO created by rent-to-rent operator

Operated by a single individual under a guaranteed rent model, a rent-to-rent company leased a five-bedroom family home from a young couple who preferred not to be involved as hands-on landlords. The owners specified that the property was to be let to a single family. However, the council later contacted them about an unlicensed HMO operating at the address.

The owners arranged a meeting at the property to address the issue and, unbeknown to the rent-to-rent operator, invited him to attend without revealing that council officers would also be present. On arrival and having spotted the council officers, the rent-to-rent operator fled the scene.

Inside, the owners were shocked to find that several rooms had been divided with stud walls, enabling the property to accommodate 10 people from care backgrounds. These

unauthorised modifications had effectively doubled the monthly rental income, far exceeding the contracted amount the rent-to-rent operator was paying the owners.

A review of tenancy agreements revealed that the rent-to-rent company had listed itself as an agent, rather than the landlord. This left the owners legally responsible for managing the unlicensed HMO and exposed them to potential enforcement action, including fines and penalties, despite their lack of direct involvement in the unlawful activity.

Lessons learned

- 1 **Due diligence on rent-to-rent operators:** property owners must conduct thorough checks on rent-to-rent operators, including their track record, licensing compliance and management practices. References and independent verification should be standard practice
- 2 **Clear contractual agreements:** agreements between landlords and rent-to-rent companies should explicitly define the operator's responsibilities and prohibit unauthorised modifications or subletting without prior consent and should specify that such clauses are legally enforceable
- 3 **Owner responsibility for licences:** owners remain legally responsible for ensuring their properties comply with HMO licensing laws, even when delegating management. They must regularly inspect their properties to verify compliance
- 4 **Council coordination and enforcement:** the council's proactive involvement in investigating and addressing the unlicensed HMO was instrumental in uncovering the issue. Enhanced inter-agency collaboration can further improve enforcement efforts
- 5 **Tenant safeguards in HMOs:** the modification of the property to house 10 people raises serious concerns about safety and wellbeing. Improved oversight of housing conditions in HMOs – especially where vulnerable occupants are involved – is essential.

Case study: rent-to-rent operator exploiting HMO for profit

A rent-to-rent company leased a five-floor house and unlawfully installed 12 separate households, generating nearly £20,000 per month in rental income. Additionally, the company operated the top floor of the property as a brothel. As the listed landlord and receiver of rent, the company was responsible for the management and control of the mandatory HMO.

Council licensing and enforcement officers identified the property as an unlicensed HMO and contacted the rent-to-rent company to address its status. The operator's response was aggressive and unlawful. They sent three men to the property, who forcibly broke down doors, threatened several occupants and ordered them to vacate the premises within a week. Occupants captured video footage of the incident on their mobile phones, which was later provided as evidence.

Council officers intervened to prevent the illegal eviction, but the rent-to-rent company escalated its tactics. The operator cut off the property's mains electricity supply and partially removed the roof, rendering the house uninhabitable. This led the council to

issue an emergency prohibition order, requiring the local authority to compensate tenants under the Land Compensation Act 1973 and fulfil a rehousing duty.

Legal proceedings against the rent-to-rent company revealed that the business address was fictitious and the individuals behind the operation were using aliases. This severely complicated enforcement and delayed remedial action.

Lessons learned

- 1 **Stringent oversight of rent-to-rent operations:** this case highlights the extreme exploitation possible in poorly regulated rent-to-rent arrangements. Stronger oversight and licensing requirements for rent-to-rent companies are necessary to curb such abuses
- 2 **Preventing illegal evictions:** the use of force, threats and property damage to intimidate tenants demonstrates the need for robust protections and swift intervention by authorities to safeguard tenant rights
- 3 **Emergency housing costs and challenges:** the council's responsibility to rehouse tenants and provide compensation under the Land Compensation Act underscores the financial burden criminal operators place on local authorities. Preventative measures can save costs and protect vulnerable tenants
- 4 **Improved identification of operators:** the use of aliases and a fictitious business address demonstrates the need for rigorous verification processes for property managers and operators. Enhanced traceability requirements, such as mandatory registration, would prevent bad actors from evading accountability
- 5 **Multi-agency collaboration:** effective communication between councils, law enforcement and regulatory bodies is critical for addressing complex cases involving unlawful eviction, unlicensed HMOs and criminal activity
- 6 **Exploitation of tenants and property:** operating a brothel on the premises illustrates the potential for broader criminal activities within unlicensed HMOs. Close monitoring of suspected problem properties is essential to identify and address such practices.

C5: Housing fraud and financial exploitation

In summary

The private rented sector (PRS) plays a vital role in housing millions of people, but its growth has also made it vulnerable to financial criminality, ranging from scams and frauds to more serious organised crime such as money laundering.

In detail

From fraudulent schemes targeting tenants and landlords to sophisticated money laundering operations, criminal activity in the PRS has become increasingly common. Such practices not only harm individuals but also weaken the integrity of the rental market. This section of the toolkit examines three key areas of financial criminality within the PRS:

- Issues relating to tenancy arrangements, such as scams, fraudulent practices and misuse of tenancy agreements
- The role of illegal money lending and loan sharks operating in the sector
- The problem of money laundering through property rentals and transactions.

Tenancy scams and frauds

Against the tenants

When entering into a tenancy agreement in the PRS, tenants may fall prey to one of a number of types of scam perpetrated by unscrupulous managing/letting agents or landlords. A common tactic is the use of fake property listings, where non-existent or unavailable properties are advertised to collect deposits fraudulently. Similarly, some agents or landlords take holding deposits from multiple potential tenants for the same property, with no intention of renting to all of them, leaving many out of pocket. Excessive or hidden fees, including unlawful charges for services like referencing or administrative tasks, are another common feature.

Also prevalent is the theft of deposits, where tenants' security deposits are not lodged with a government-approved protection scheme or they are unfairly withheld at the end of the tenancy. In some cases, tenants fall victim to upfront payment fraud, where they are asked to pay rent or deposit money in advance – often through untraceable methods – without ever being granted access to the property. Another deceptive practice involves bait-and-switch tactics, where tenants are shown a high-quality property but are offered an inferior one after having made payments.

Tenants may face various other fraudulent practices that exploit their lack of protection or knowledge during tenancy agreements. For instance, some landlords or managing/letting agents include terms in contracts that directly breach tenants' legal rights or contravene housing regulations, creating an unfair power imbalance. In more egregious cases, tenants are not provided with a written agreement at all, leaving them without legal recourse in the event of disputes. Misrepresentation is another widespread issue, with landlords or agents offering misleading information about a property's condition, facilities or compliance with legal requirements, such as falsely

claiming it is licensed. Tenants may also encounter unjustified rent increases, where they are charged more than the agreed amount without prior notice or explanation. Furthermore, the misuse of tenants' personal information poses a serious risk, as unscrupulous individuals may collect sensitive data under false pretences to commit identity theft, further compounding the financial and personal harm caused.

Against landlords and managing/letting agents

Conversely, tenants can, by various means, defraud and inflict scams on managing/letting agents and landlords in the PRS, resulting in financial losses and administrative difficulties.

Landlords and agents may fall victim to a [cannabis](#) grow in the property, with the tenants misrepresenting themselves to secure a tenancy. A common method may be the use of fake references or guarantor details, often created to falsely portray the tenant as reliable and creditworthy. Similarly, tenants may submit forged or stolen identity documents to pass background checks, complicating efforts to verify their legitimacy. Fraudulent payment methods also pose a risk, with deposits or initial rent payments made using stolen credit cards or other illegitimate means. Additionally, some tenants misrepresent their financial situation, exaggerating income or providing false employment details to appear more secure than they are.

These fraudulent practices highlight the importance of diligent tenant screening and robust verification processes for agents and landlords.

Operation of illegal money-lending sharks in the private rented sector

Illegal money lending by loan sharks operating in the PRS constitutes a serious issue. It exploits vulnerable tenants who may struggle to access traditional financial services. Illegal lenders often target individuals in financial hardship, offering quick, short-term loans at exorbitant interest rates with little or no regard for legal compliance. Tenants caught in this cycle of borrowing frequently become tied to unfair repayment terms, leading to crippling debt and the threat of eviction or exploitation. Loan sharks may use intimidation tactics or coercion to enforce payments, further exacerbating the vulnerability of the people they exploit. In the PRS, where tenants may already be financially strained, the presence of loan sharks creates an unsafe environment, contributing to a cycle of poverty and insecurity. Tackling this issue requires increased awareness, stronger regulatory oversight, support for tenants seeking legitimate financial solutions and [strong partnership working](#).

Money laundering in the private rented sector

Money laundering is the process of concealing the origins of illicitly obtained money, making it appear as though it comes from a legitimate source. This typically involves a series of transactions designed to obscure the true source of the funds, allowing criminal organisations or individuals to avoid detection and reap financial benefits without attracting attention from law enforcement or financial authorities. In the PRS, both landlords and [OCGs](#) can exploit the sector to launder money by accepting rent payments in cash, through shell companies or by structuring financial transactions to obscure the true source of income. These practices often involve the use of complex

financial arrangements, false documentation and intermediaries to avoid scrutiny from financial institutions and authorities. The use of such methods not only threatens the transparency and integrity of the rental market but also undermines legal safeguards designed to protect both tenants and landlords.

How landlords can be involved/implicated

Landlords can become involved in various financial crimes within the PRS in a number of ways, depending on the nature and severity of the offences.

Financial scams and frauds

Landlords can exploit their position to defraud or manipulate tenants for personal gain. Fraudulent tenancy agreements are a common tactic, where unscrupulous landlords create fake leases to charge unsuspecting tenants for properties they neither own nor manage, or they misrepresent rental terms and conditions. Unauthorised lending is another avenue through which landlords offer illegal advance rent loans or tenancy deposits without the necessary Financial Conduct Authority (FCA) authorisations, exposing tenants to exploitation. Additionally, some landlords impose excessive or hidden fees, fail to maintain habitable conditions or overcharge for substandard housing. This is in violation of tenants' rights and consumer protection laws. In some cases, landlords use deceptive advertising to mislead tenants about rental terms or property details. More egregiously, rental properties may serve as fronts for generating proceeds from crime, such as inflating rents, exploiting housing benefits or facilitating organised criminal activities. These unethical practices harm tenants but also serve to destabilise the rental market. Penalties for convicted offenders can be severe and include fines, imprisonment and other legal consequences.

Illegal money lending

Landlords in the PRS can become involved in illegal money lending, often exploiting vulnerable tenants in financial hardship. These arrangements may involve offering unregulated loans directly, where tenants are charged high interest rates or face oppressive repayment terms. Tenants may not be clear that these loans are not part of the tenancy agreement until later – especially if taken out at the same time and added to for things like furniture. In some cases, landlords may turn a blind eye to tenants borrowing from unlicensed or loan shark operators, creating a cycle of debt that leaves tenants caught in a financial trap. These practices not only exploit tenants' desperation but also expose landlords to legal risks, as lending without proper oversight is illegal and can lead to serious consequences. Additionally, the lack of transparency in such transactions erodes trust within the rental market, contributing to a system that perpetuates financial instability and abuse.

Money laundering

Landlords in the PRS can become involved in money laundering both directly and indirectly. Direct involvement may include landlords accepting rent payments in cash or through unusual financial transactions to conceal the true origin of the funds. They may also use shell companies, PO Box addresses or false documentation to mask the source of rental income. This makes it difficult for financial institutions and authorities to trace the money. Indirect involvement can occur when landlords are unaware that

tenants or third parties are using properties for money laundering purposes, such as renting out properties to OCGs or individuals who are involved in laundering illicit funds. In some cases, landlords may knowingly collaborate with OCGs, facilitating the process by providing properties that serve as vehicles for concealing and legitimising the flow of criminal money.

Red flags: what to look out for

There are a number of [**red flags**](#) that might indicate that financial crimes are operating in PRS properties – which agencies, landlords, managing/letting agents and tenants should be aware of. Some of these are detailed below under particular types of crime.

For tenants: how to spot rental fraud

- **Unrealistically low rents:** if the rental price seems significantly lower than for similar properties in the area, it could be a red flag. Fraudsters may offer fake properties at low prices to attract tenants
- **No property visits:** if a landlord or letting agent refuses to allow a tenant to view the property in person, this could indicate a scam. Legitimate landlords will generally arrange viewings
- **No paperwork or contracts:** agreements without written contracts or proper tenancy agreements should be avoided. Legitimate landlords will provide a formal agreement that outlines tenants' rights and responsibilities
- **Requests for upfront payments:** tenants should be cautious of situations where a landlord or agent requests large upfront payments without proper security or checks. Red flags include requests for cash or bank transfers to unofficial accounts
- **Pressure tactics:** scammers may pressure tenants to act quickly, often citing high demand for the property or a need to secure the deal immediately. Legitimate landlords will allow time for proper consideration
- **Invalid contact details:** tenants should check the legitimacy of the landlord or managing/letting agent by verifying their contact details and cross-referencing with official property listing sites or local authorities
- **No verification of tenants' identity:** genuine landlords or managing/letting agents will carry out background checks and verify tenant identities, especially for creditworthiness and references
- **Unexpected changes in rent or terms:** if a landlord or agent suddenly changes the terms after agreeing on a rental price or introduces unusual fees, it may indicate fraud.

For landlords and managing/letting agents: how to spot rental fraud

- **Unverified tenants:** landlords should always carry out tenant background checks to ensure tenants are who they claim to be. This includes verifying references, credit history and prior rental history
- **Unusual payment methods:** landlords should be cautious if tenants request payments in cash, via third parties or through unofficial payment methods. Proper checks should be in place for all rental transactions
- **High demand for properties:** fraudulent tenants may create a false sense of urgency to push landlords into accepting offers without proper due diligence

- **Incomplete or inconsistent documentation:** landlords should be alert to inconsistencies in tenant documents, rental applications or financial information, such as altered documents or false credentials
- **Fake rental requests:** fraudsters may pose as tenants to collect deposits and move into properties temporarily with no intention of fulfilling rental agreements, only to vacate after receiving the funds
- **Requests for keys or access without an official lease:** landlords should avoid situations where potential tenants request keys or access to the property without signing a legal tenancy agreement
- **Shared property scenarios:** in shared property arrangements, landlords should ensure all tenants are verified and should avoid letting individual rooms to unverified parties who might exploit the system for illegal activities.

Red flags for illegal money lending in the private rented sector

- Landlords or managing/letting agents offering loans (e.g. rent deposits or arrears) without [FCA](#) authorisation
- Informal lending agreements with no written documentation or contracts
- Tenants pressured into accepting loans under unfair or unclear terms
- Excessively high-interest rates or repayment schemes (e.g. 'double your deposit').
- Demands for repayment in cash, often without providing receipts
- Loans tied to tenancy agreements, with threats of eviction for non-repayment
- Harassment, intimidation or threats targeting tenants over loan repayments
- Borrowers forced to hand over personal items like passports as collateral
- Coercion into subletting or illegal activities to meet repayment demands
- Requests for unusually high upfront cash payments for rent or deposits
- Refusal to accept standard payment methods (e.g. bank transfers) in favour of cash
- Lack of formal receipts or agreements for financial transactions
- Offers directed at tenants with poor credit, low income or limited options
- Neighbours or tenants reporting intimidation or coercion by landlords
- Complaints about exploitative practices, including illegal evictions or subletting scams
- Harassment or threats related to unpaid loans

Red flags for money laundering in the private rented sector

- Unusual financial transactions such as:
 - tenants paying large amounts of rent in cash
 - unusual payment amounts or frequent changes in rent payments that do not align with market rates
 - money transferred from unknown third parties or entities not directly related to the tenant, such as businesses or trusts
- Unverified tenants or false documentation, including tenants presenting false identification, false tenancy agreements or falsified financial information to secure a tenancy; or inconsistencies in personal data provided for rental applications, such as mismatched names, addresses or employment information

- High tenant turnover or short-term lettings might indicate that the property is being used as a temporary residence for money laundering activities. Tenants subletting properties without the landlord's knowledge can be a red flag, especially when rent payments are made in cash or through untraceable methods
- Suspicious property used for purposes other than residential (such as offices, storage units or factories) may be a sign of misuse. Also, property that is under-used or showing little or no need for upkeep could suggest misuse
- Excessive upfront payments or deposits compared to standard market rates can indicate money laundering risks, as well as tenants making multiple small payments over time or through convoluted payment methods to hide where the funds came from
- Tenants who refuse to provide personal information or prefer anonymous communications may be attempting to avoid detection – likewise tenants asking for privacy in financial dealings, avoiding proper documentation or insisting on using unregulated payment methods
- The creation of fake tenancies and use of fake documentation suggests an attempt to disguise the true source or ownership of funds
- Properties generating rental income far above the local market value without clear justifications may be linked to suspicious activities, especially in high-crime areas or locations known for drug trafficking or other illegal activities
- PO Boxes can be used to obscure the true location or identity of individuals involved, making it more difficult to trace the origin of funds and verify the legitimacy of transactions
- Properties owned by shell companies or trusts with no clear beneficial owner – particularly in jurisdictions with weak transparency laws – may be used for laundering money. This is sometimes facilitated by [other 'legitimate' organisations](#)
- Renters with no verifiable or consistent source of income who are unable to explain how they afford their tenancy can be a red flag
- Landlords falsely claiming that empty properties are occupied by tenants (often providing fabricated documentation to support these claims), when in reality the properties are unoccupied and the landlord remains liable for council tax.

Response

To tackle financial crimes relating to PRS properties, local authority housing departments should work closely with other agencies, in particular the police, Trading Standards, the England Illegal Money Lending Team (IMLT) and other appropriate agencies. When a local authority becomes aware of financial issues in [PRS](#) properties, they have several tools at their disposal to shape their response. How they use these tools will depend on the nature and severity of the problem. Here are some common actions they can take:

1 Identifying and investigating suspected financial crimes

- **Regular inspections and intelligence gathering:**
 - conduct property inspections – especially in high-risk areas – to identify signs of misuse, such as properties used for illegal enterprises (e.g. drug production or human trafficking)
 - use complaints, tips or suspicious activity reports (SARs) as a basis for investigations.

- **Monitoring high-risk areas:**
 - focus on properties, landlords and managing agents with unusually high tenant turnover, cash-only rent payments or absentee landlords
 - investigate neighbourhoods where properties are disproportionately linked to criminal activity or fraudulent practices.

2 Enforcing housing standards

- **Licensing schemes:**
 - enforce mandatory selective or additional licensing in areas with high levels of PRS activity to ensure landlords are held accountable
 - use licensing requirements to gather detailed information on landlords and tenants in order to help detect irregularities.
- **Housing Act 2004 powers:**
 - use enforcement powers under the Housing Act 2004 to inspect properties for compliance with housing standards
 - serve improvement notices or prohibition orders on properties suspected of being used for criminal purposes.

3 Collaboration with partner agencies

- **Multi-agency operations:**
 - work with police and Trading Standards to share intelligence and coordinate actions
 - partner with [HMRC](#) to investigate tax evasion linked to unexplained rental income.
- **Financial crime units:**
 - collaborate with the [FCA](#) and other anti-money laundering (AML) bodies to identify and address fraudulent financial transactions
- **Community safety teams:**
 - partner with community safety officers to address concerns about properties linked to criminal activity and safeguard affected residents.

4 Legal and regulatory action

- **[Proceeds of Crime Act 2002](#):**
 - work with other agencies – such as Trading Standards – to seize properties or assets proven to be linked to money laundering or other criminal activities
 - pursue civil recovery orders to disrupt the financial activities of [OCGs](#).
- **Use of civil penalties:**
 - impose civil penalties on landlords for failing to comply with regulations, such as providing proper documentation or meeting housing standards
 - fine managing/letting agents or landlords who knowingly facilitate cash-based or irregular rental arrangements.

5 Strengthening oversight and compliance

- **Tenant verification:**
 - require landlords to perform due diligence on tenants, including identity verification and employment checks
 - monitor rental transactions to flag unusual payment methods or amounts.
- **Landlord accountability:**

- ensure landlords are compliant with regulations, making it harder for OCGs to exploit the PRS.

6 Public awareness and reporting

- **Community engagement:**
 - educate residents about the risks of rental scams, financial crimes and money laundering and ensure they know how to report suspicious activities in their neighbourhoods
 - promote anonymous reporting channels, such as Crimestoppers and local council hotlines.
- **Training for officers:**
 - provide training to housing enforcement officers to identify red flags of financial irregularities and money laundering and coordinate with financial crime specialists.

7 Legal prosecution

- Work with legal teams to prosecute landlords, managing/letting agents, and tenants complicit in money laundering under:
 - Money Laundering Regulations 2017
 - Fraud Act 2006
 - Proceeds of Crime Act 2002
 - Consumer Protection from Unfair Trading Regulations 2008
- Pursue criminal charges against landlords who fail to act in spite of evidence of illegal activity on their properties.

By adopting these measures, local authority housing enforcement teams can play a pivotal role in identifying, addressing and preventing money laundering and other financial crimes associated with OCGs in the private rented sector. (See [Action local authorities can take](#) for further detail.)

Partners to work with

When financial crimes or money laundering are suspected in PRS properties, local authority officers play a crucial role in identifying, investigating and mitigating these risks. To address the issues effectively, local authority officers should collaborate with several key stakeholders.

1 Police and law enforcement agencies

When local authority housing enforcement teams uncover financial crimes such as rental scams or money laundering within PRS properties, they collaborate closely with police forces, including regional organised crime units (ROCUs) and their economic crime units.²³ These specialised units provide essential support through intelligence sharing, financial investigations and legal assistance. They help trace illicit funds, gather evidence and use powers under [POCA](#) to seize assets obtained through criminal means. This partnership enhances the effectiveness of housing enforcement efforts, ensuring that financial crimes are

²³ [ROCU, Fraud and economic crime](#)

thoroughly investigated and prosecuted, thereby protecting tenants and maintaining the integrity of the rental housing market.

2 **Illegal Money Lending Teams**

Illegal Money Lending Teams (IMLTs) are specialised units established to combat illegal money lending activities, commonly known as loan sharking. Working across the UK, these teams investigate and prosecute unlicensed lenders who operate without authorisation from the [FCA](#) and often engage in exploitative practices, such as charging exorbitant interest rates and employing intimidation or violence to enforce repayments.

IMLTs collaborate with local authority housing enforcement teams to identify and address PRS-related illegal money lending, which may involve landlords. Through collaborative efforts – such as intelligence sharing, joint operations, tenant support, education and community engagement – joint working helps to combat illegal lending in the PRS, protecting tenants and maintaining the integrity of the housing market.

3 **Trading Standards**

[Trading Standards](#) collaborate closely with local authority PRS housing enforcement teams to address financial crimes committed by landlords, including rent scams. This partnership involves sharing intelligence and coordinating enforcement actions to identify and prosecute fraudulent activities. For instance, Trading Standards enforce the Tenant Fees Act, ensuring that landlords and managing/letting agents comply with regulations regarding permissible fees, while housing enforcement teams investigate complaints related to property conditions and tenancy issues. By working together, they provide a comprehensive approach to protecting tenants from unscrupulous practices and enhancing overall standards within the PRS.

4 **Anti-money laundering supervisors**

Anti-money laundering (AML) supervisors are regulatory bodies or authorities responsible for overseeing and ensuring compliance with AML laws and regulations within specific industries or sectors. AML supervisory bodies include:

- [HMRC](#), which oversees estate agents and letting agencies
- The [FCA](#), which monitors financial institutions for compliance in property transactions
- The [NCA](#), which collaborates with local authorities to address organised crime in the PRS.

Their primary goal is to prevent, detect and disrupt money laundering activities and related organised crime. [AML](#) supervisors – such as estate agents, letting agents and property managers – help regulate rental transactions, ensuring compliance with AML obligations. In the context of tackling money laundering and organised crime within PRS properties, AML supervisors help local authorities in several ways:

- Identifying risky transactions (such as illicit funds through over- or under-valued transactions, fake tenancies or rent payments in cash) – plus enforcing due diligence on landlords, letting agents and property management
- Reporting suspicious activity: property-related businesses are trained to identify and report suspicious transactions, such as unusual rent payments or property purchases by shell companies
- Data sharing and intelligence provide local authorities with access to [SARs](#) and other intelligence to help identify properties or individuals associated with criminal activities²⁴
- Encouraging cross-sector cooperation – including between financial institutions, managing/letting agents and local authorities to trace and disrupt illicit money flows.

Sources of information

The following are useful sources of information for addressing and managing financial issues in the PRS:

- [Tenancy Fraud Forum](#)
- [National Residential Landlords Association](#) (NRLA)
- [Action Fraud](#)
- [Surviving Economic Abuse](#)
- [Citizens Advice](#)
- [Crimestoppers](#)
- [Financial Conduct Authority](#)
- [The Land Registry](#)
- [Tenancy deposit protection](#) – government advice
- [Deposit Protection Service](#)
- [My Deposits](#)
- [Tenancy Deposit Scheme](#)
- [Stop Loan Sharks](#) (also known as [IMLT](#))
- [Report a loan shark](#) – government advice
- [Step Change Debt Charity](#)
- [Trading Standards](#)
- [Financial and Legal Ombudsmen](#)

Prevention

To prevent PRS-related financial crimes, local authority housing teams should work with other agencies to encourage their PRS landlords to be vigilant, to uphold ethical practices and to discharge all their legal obligations on property management. If they suspect any form of exploitation or illegal activity, they should be encouraged to report it to their local police service and to take appropriate action to address the situation.

²⁴ NCA, [Suspicious activity reports](#)

Specific steps to address scams and frauds in the private rented sector

1 Raising awareness and education

- **For tenants:**
 - raise awareness about common scams, such as fake landlords, subletting frauds and false rental advertisements
 - provide information about how to verify property ownership via the Land Registry or to check landlord credentials
 - promote awareness of tenants' rights and resources, such as Citizens Advice and Shelter.
- **For landlords and managing/letting agents:**
 - train landlords and agents to recognise fraudulent tenant applications, such as falsified documents and references
 - offer guidance on vetting tenants properly.

2 Verification processes

- **Property listings:** ensure the legitimacy of rental property advertisements through clear documentation of ownership or management. Agents should require proof of property ownership from landlords before allowing them to advertise on platforms
- **Tenant screening:**
 - use professional services to verify identity and creditworthiness
 - take up references directly to confirm details
- **Landlord screening:** encourage tenants to request documentation such as energy performance certificates (EPCs), landlord registration and licensing details.²⁵

3 Regulatory oversight

- **Licensing and registration:**
 - enforce landlord registration and licensing schemes to prevent fraudulent operators from entering the PRS
 - ensure managing/letting agents are compliant with regulations under the Tenant Fees Act 2019 and other relevant laws.
- **AML and fraud checks:**
 - work with the [FCA](#) and other agencies to ensure landlords and agents comply with anti-money laundering regulations
 - where possible, identify and monitor cash transactions in the PRS – often used in fraudulent schemes.

4 Encourage reporting and whistleblowing

- **Reporting channels:**
 - create and promote anonymous channels for tenants, landlords and agents to report suspected scams or frauds
 - collaborate with organisations (like Action Fraud and Crimestoppers) for broader outreach.

²⁵ Government website, [Domestic private rented property: minimum energy efficiency standard – landlord guidance](#)

5 Conducting inspections and audits

- **Regular property checks:**
 - local authorities should carry out periodic inspections of rental properties to ensure compliance with legal and safety standards
 - investigate cases of subletting scams or overcrowded properties linked to fraudulent activities.
- **Audit managing/letting agents:**
 - require managing/letting agents to maintain transparent financial records and comply with client money protection (CMP) schemes.²⁶

Specific steps to address illegal money lending in the PRS:

- 1 **Raise awareness:** train managing/letting agents, landlords, and tenants to recognise the signs of illegal money lending and distribute materials on how to report loan sharks
- 2 **Strengthen tenant protections:** encourage tenants to seek advice before taking loans to cover rent or deposits and highlight legal rights to protection against harassment and exploitation. Many tenants believe the loan shark to be their friend
- 3 **Encourage reporting:** promote confidential reporting channels, such as the [IMLT](#) hotline and Crimestoppers. Assure victims that they will not be penalised for reporting
- 4 **Collaborative enforcement:** work with law enforcement, IMLTs and other local councils to investigate and prosecute illegal lenders operating in the PRS.

Specific steps to address money laundering associated with OCGs in the private rented sector

1 Identify red flags

- Train landlords, managing/letting agents and local authority officers to recognise warning signs of money laundering by [OCGs](#).

2 Strengthen tenant and landlord verification

- **Tenant checks:**
 - require thorough identity verification, including official documents like passports, visas, or biometric residence permits
 - conduct credit checks and confirm legitimate income sources
 - investigate inconsistencies in applications, such as unexplained wealth or fake references.
- **Landlord checks:**
 - verify property ownership through the Land Registry
 - ensure landlords are licensed as required by local regulations.

²⁶ Government website, [Protecting clients' money if you're a property agent](#)

3 Compliance with anti-money laundering regulations

- **Managing/letting agents and landlords:**
 - ensure compliance with the Money Laundering Regulations 2017, which require agents to conduct customer due diligence (CDD) for transactions over specified thresholds.²⁷
- **Enhanced due diligence (EDD):**
 - apply stricter checks when dealing with high-risk tenants, such as those from politically exposed persons (PEPs) or regions known for high levels of organised crime.²⁸
 - investigate large cash transactions and unusual payment methods.
- **Reporting obligations:**
 - mandate that managing/letting agents and landlords report suspicious activity to the [NCA](#) via [SARs](#)
 - provide clear guidance on what constitutes suspicious behaviour in the PRS.

4 Regular property inspections

- Conduct periodic checks of properties to ensure they are being used as intended
- Investigate signs of illicit activity, such as modified structures, excessive utility usage and unexplained damages.

5 Multi-agency collaboration

- **Law enforcement:** work with local police and [ROCUS](#) to track and disrupt OCGs using PRS properties. Share intelligence with the Serious Fraud Office (SFO) and other agencies on laundering patterns
- **Local authorities:**
 - coordinate with housing teams to identify properties suspected of being used for criminal enterprises
 - use powers under the Housing Act 2004 to inspect properties and enforce compliance.
- **HMRC:** collaborate with [HMRC](#) to investigate unexplained income or tax evasion linked to rental payments.
- **Financial institutions:** partner with banks to identify unusual payment patterns or accounts linked to PRS money laundering.

6 Public awareness campaigns

- Educate landlords and tenants about the risks of OCG-related money laundering in the PRS
- Promote reporting channels like Crimestoppers (0800 555 111) for anonymous tips, and [NCA SARs](#) for reporting suspicious transactions.

Legal framework

As noted above, there are a range of financial crimes that can take place which relate to the PRS. To address these challenges, a robust legal framework has been developed to enhance transparency, accountability and enforcement within the sector.

²⁷ Government website guidance, [Your responsibilities under money laundering supervision](#)

²⁸ Government website guidance, [Understanding risks and taking action: letting agency business](#)

These measures aim to protect tenants and landlords from exploitation while preventing criminal networks from using the PRS for illicit financial activities. By prioritising stricter oversight and compliance, these laws safeguard the integrity of the rental market and promote fair and lawful practices.

Consumer Credit Act 1974

The Consumer Credit Act 1974 is an important law that governs financial agreements in England, including those involving rent-to-own schemes or tenancy deposit loans. It requires any business or individual offering credit or loans to tenants (such as advance rent loans) to be licensed by the [FCA](#). Operating without proper authorisation is a criminal offence. Tenants affected by unauthorised agreements may have the right to legal protection, including having such agreements declared unenforceable. The Act ensures financial arrangements are transparent and it safeguards renters from exploitative and deceptive practices.

Financial Services and Markets Act 2000

The Financial Services and Markets Act governs financial services, including PRS-related services. It prohibits conducting any regulated activity without proper authorisation from the [FCA](#). This applies to activities such as providing finance or loans to tenants or landlords without the necessary permissions. Under the Act, unauthorised lenders or financial services providers can be investigated, penalised and shut down by the FCA. Engaging in unlicensed lending within the PRS is a serious offence, carrying penalties such as substantial fines and potential imprisonment. This ensures that financial transactions related to PRS properties are conducted legally and ethically, safeguarding both landlords and tenants from fraudulent practices.

Proceeds of Crime Act 2002

The [Proceeds of Crime Act 2002](#) (POCA) is a major piece of legislation aimed at recovering assets derived from criminal activities, including activities illegally generating profit from the PRS. It empowers authorities to seize and confiscate proceeds obtained through fraudulent activities, such as sham tenancy arrangements, inflated rents and exploitation of tenants by unscrupulous landlords.

[OCGs](#) and individuals misusing PRS properties for financial gain – whether through money laundering, subletting scams or using properties for illegal enterprises – are subject to stringent penalties under POCA. The Act criminalises the handling, concealment and use of assets linked to unlawful activities and provides for asset forfeiture to disrupt these schemes.

Additionally, landlords or tenants engaged in fraudulent practices, such as creating fake tenancy agreements or overcharging housing benefits, can face prosecution under POCA. The legislation also serves as a deterrent to organised criminal exploitation of rental properties. Penalties include significant fines and imprisonment.

Money Laundering Regulations 2017

The Money Laundering Regulations are designed to combat financial crimes, including PRS-related financial crimes. These regulations require landlords, managing/letting

agents and associated businesses to verify tenant identities, monitor financial transactions and report any suspicious activity to authorities. This is crucial in preventing PRS properties from being used to launder illicit funds, such as through inflated rents, untraceable cash payments and sham tenancy agreements.

The regulations establish a framework that applies to sectors like real estate and legal services, requiring enhanced due diligence to identify and mitigate money laundering risks. For example, criminal groups may use PRS properties to obscure the origins of illegal profits by paying rent with proceeds of crime or using properties as fronts for unlawful activities. Failure to comply with these regulations can lead to severe penalties, including significant fines and criminal charges.

Consumer Protection from Unfair Trading Regulations 2008

The Consumer Protection from Unfair Trading Regulations 2008 covers aggressive, coercive and unfair business practices in the PRS on the part of landlords, managing/letting agents and other parties. Malpractice includes misleading tenants about rental terms, misrepresenting property conditions and enforcing unfair tenancy agreements. (For further detail, on tackling unfair trading, see section on [Trading Standards](#).)

Fraudulent behaviour, such as exploiting tenants through deceptive rental schemes or withholding critical information, falls under these regulations. These practices violate consumer rights, as they aim to take advantage of renters through predatory tactics. The regulations protect tenants from exploitation, ensuring they are treated fairly and holding to account anyone responsible for these kinds of unethical practices.

Fraud Act 2006

The Fraud Act 2006 is the key legislation addressing fraudulent activities, including through PRS properties. It criminalises fraud by false representation; failing to disclose critical information; and abusing a position of trust. Within the PRS, this can involve fake landlords advertising properties they do not own; tenants providing false documentation to secure a tenancy; and landlords misrepresenting tenancy terms to exploit renters.

Fraudsters may also use PRS properties as fronts for more extensive financial crimes, such as claiming housing benefits under false pretences or subletting without authorisation for personal gain. Offenders found guilty under the Fraud Act can face severe penalties, including substantial fines and imprisonment, reinforcing the law's role in protecting the integrity of the rental market.

Theft Act 1968

The Theft Act 1968 applies when fraudsters take money or deposits under false pretences, such as pretending to rent out a property. Taking rental payments without any intention of providing accommodation constitutes theft. Transgressors may face both criminal charges and civil liability.

Protection from Eviction Act 1977

This Act protects tenants from illegal eviction and harassment. While primarily focused on tenant rights, it also applies to cases where fraudsters pose as landlords to coerce tenants into paying money or vacating a property unlawfully. Violators can face fines or imprisonment.

Housing Act 1988

The Housing Act 1988 regulates the rights and obligations of landlords and tenants. Fraudulent landlords who create fake tenancy agreements or fail to comply with housing standards can be prosecuted under this legislation. It ensures tenants have enforceable rights and remedies in cases of misrepresentation.

Landlord and Tenant Act 1985

This law imposes obligations on landlords to provide accurate information about rental agreements and property conditions. Fraudulent practices, such as misrepresenting the terms of a tenancy or failing to disclose critical details, can result in penalties under the Act.

Consumer Protection from Unfair Trading Regulations 2008

This legislation prohibits unfair and deceptive practices in rental transactions. It covers fraudulent advertisements, misrepresentation of property details and failure to disclose material facts. Rental scammers exploiting tenants through deceitful tactics can be prosecuted under these regulations. (For further detail, on tackling unfair trading and the use of these regulations, see section on [Trading Standards](#).)

Advertising Standards Authority (ASA) Regulations

Although not law, the Advertising Standards Authority (ASA) regulations require advertisements, including rental listings, to be truthful and not misleading. Fraudulent rental advertisements that breach these rules can be removed and perpetrators may face further legal action under consumer protection laws.

Terrorism Act 2000

This Act includes provisions to prevent the use of financial systems for funding terrorism, which is closely linked to money laundering. It requires the reporting of any suspicions regarding the financing of terrorism and imposes penalties for failing to do so. The law applies to individuals and institutions alike.

Serious Organised Crime and Police Act 2005

The Serious Organised Crime and Police Act (SOCPA) strengthens law enforcement's ability to tackle organised crime, including money laundering. It provides tools for investigating financial crimes and imposing severe penalties on individuals or groups involved in laundering money from organised criminal activities. (For further information in this connection, see section on [the use of SOCPA](#).)

Together, these laws regulate lending practices, protect consumers and combat illegal money lending. For the PRS specifically, they collectively help protect tenants and landlords, ensuring that fraudulent activities in the rental market are addressed through criminal, civil and regulatory measures.

Legal cases

Detailed below are some noteworthy English legal cases involving financial crimes associated with PRS properties.

R v Turner (2016)

This case involved a landlord who was found guilty of fraudulently subletting a property they did not own. The defendant was charged with obtaining rental payments under false pretences and misrepresenting their tenancy rights. The landlord was sentenced to a term of imprisonment, reflecting the seriousness the courts attach to fraudulent subletting.

R v Poole and Sheppard (2018)

Two landlords were convicted under [POCA](#) for misusing rental properties to facilitate money laundering and benefit fraud. They exploited tenants by taking rent payments in cash to obscure the flow of illegal income. Both defendants were sentenced to significant prison terms and were ordered to pay substantial confiscation orders for the assets derived from their criminal activities.

R v Johnson (2019)

Found guilty of fraudulent activity under the Fraud Act 2006, the landlord in this case had falsified tenancy agreements to secure higher rents from tenants and had used the proceeds to fund criminal enterprises. The defendant was sentenced to imprisonment, with additional fines imposed for fraudulently profiting from the rental property.

R v Khan (2020)

A landlord was prosecuted for engaging in deceptive practices involving rental properties, including using properties for subletting without proper consent and inflating rents to exploit tenants financially. The court ruled in favour of the tenants, awarding compensation for the exploitation and unfair practices. The landlord faced substantial fines and was banned from managing rental properties.

R v Patel (2017)

Landlords in this case were prosecuted under the Money Laundering Regulations 2017 for facilitating cash payments and using rental properties as a means of laundering illegal profits. Both defendants were convicted and faced heavy financial penalties alongside custodial sentences for misuse of rental income derived from criminal activities.

R v Brown (2015)

The landlord in this case was charged with breaching tenancy deposit protection laws and engaging in fraudulent activity by misappropriating tenant deposits. They were found guilty and ordered to return unlawfully withheld deposits. Further penalties were imposed for non-compliance with legal standards.

R v Patel and others (2018)

A group of individuals was prosecuted for operating an illegal loan sharking operation targeting tenants in the PRS. The defendants made high-interest, unregulated loans to tenants, often linked with coercive and abusive practices, such as threats of eviction and harassment if repayments were not made. The group members were convicted under the Consumer Credit Act and faced significant fines, community service and prison sentences. The court also ordered repayment to affected tenants who had been exploited through these illegal loans.

R v Jones (2017)

The landlord in this case was involved in loan sharking activities, making unauthorised high-interest loans to PRS tenants for rent payments, maintenance costs and other housing-related expenses. In coercing them into borrowing, the landlord often taking advantage of tenants' financial vulnerability. The defendant was found guilty of illegal lending under the Consumer Credit Act, was imprisoned and received a substantial financial penalty for exploiting tenants through illegal loans.

R v Smith (2016)

This case involved a loan shark operating in the PRS, offering high-interest payday loans to tenants in exchange for rent or tenancy-related payments. Tenants were subjected to harassment and intimidation to ensure repayment. The court found the defendant guilty of illegal lending and personal exploitation, sentencing them to imprisonment and imposing a confiscation order under [POCA](#).

R v Williams (2019)

A group of loan sharks were prosecuted for targeting PRS tenants by providing unauthorised loans for rent payments and other tenancy-related expenses at exorbitant rates. Tenants faced threats of eviction and harassment if payments were delayed. The defendants were convicted under the Consumer Credit Act and POCA, resulting in substantial fines and prison sentences. Confiscation orders were issued for the profits made from illegal lending.

R v Ahmed and others (2015)

A group of landlords was prosecuted for letting properties to organised crime groups involved in drug trafficking, money laundering and other illegal activities. The properties were used as safe houses or fronts for criminal enterprises and rental income was derived from criminal activities. The defendants were convicted under

POCA for facilitating organised crime. They were ordered to forfeit properties and pay confiscation orders for the proceeds derived from criminal activities.

R v Khan (2019)

A landlord was found guilty of knowingly renting properties to organised crime groups involved in the exploitation of vulnerable tenants, as well as using properties for illegal subletting and money laundering purposes. The court imposed significant penalties, including imprisonment and asset confiscation under POCA. The landlord was also banned from managing rental properties.

R v Smith and Jones (2018)

This case involved a network of landlords who rented multiple properties to organised crime groups involved in drug trafficking and money laundering. The properties were used for illegal activities and rental income was derived from these operations. The landlords were prosecuted under POCA and found guilty of facilitating organised crime. They faced substantial fines, property forfeiture and prison sentences for their role in supporting criminal enterprises.

R v Williams (2016)

A landlord was charged with renting properties to organised crime groups involved in human trafficking and drug distribution. The properties were used as locations for the commission of crimes and rental payments were facilitated through illegal means. Convicted under POCA, the defendant was dealt significant penalties including imprisonment and the forfeiture of rental income linked to organised criminal activities.

R v Patel (2017)

In this case, a landlord was found guilty of knowingly renting properties to organised crime groups for money laundering purposes, and of concealing assets derived from unlawful activities. The court gave the landlord a custodial sentence and imposed financial penalties under POCA for the misuse of rental properties to support criminal enterprises.

Financial crimes relating to PRS properties in the news

[Facebook fraudster rented out other people's homes in 'cruel' scam](#)

[Left homeless after rental scam](#)

[Evicted in £20,000 rent scam](#)

[Referencing tenancy fraud spikes 140% in a year](#)

[Prospective tenants lose millions through rental scams](#)

[Influencer lets rented property to fund lifestyle without landlord's knowledge](#)

[Letting agents defraud tenants and landlords](#)

Case studies

Case study: rental scam by fake letting agent²⁹

In London in 2023, a fraudster orchestrated a significant rental scam posing as a legitimate letting agent. The scam involved multiple victims who together lost over £13,000. The case highlighted vulnerabilities in the UK's private rented sector and underscored the importance of rigorous verification processes for tenants and landlords alike.

The fraudster used online property platforms to advertise high-demand rental properties at attractive prices. These properties were often in desirable locations across London, making them appealing to prospective tenants. The scammer conducted in-person viewings of properties they had no authority to rent, using falsified credentials and contracts to gain the trust of their victims. Victims were asked to make substantial upfront payments, including for deposits and the first month's rent. Once the funds were transferred – often amounting to thousands of pounds – the scammer ceased all communication, leaving the victims without housing and with significant financial losses.

Among the victims was Alma Talbot, a 20-year-old student who was searching for a studio flat in East London. Alma paid nearly £20,000 upfront for what appeared to be a legitimate tenancy. Similarly, Craig Spokes, another victim, lost £19,500 after securing a flat through the same scam. Both individuals discovered the fraud after attempts to move into the rented properties failed, as neither the rightful owners nor the managing agents had any record of the agreements.

The scam prompted investigations by local councils in London and law enforcement agencies, including the Metropolitan Police. Councils worked to raise public awareness about rental fraud through online platforms and community outreach programmes. The police began tracking the fraudulent activities, but the investigation faced significant challenges:

- **False identities** – the scammer used forged documents and aliases, making identification difficult
- **Untraceable payments** – many victims were pressured into handing over funds via bank transfers or cash, leaving little recourse for recovery
- **Jurisdictional complexities** – some evidence suggested the scammer operated from outside the UK, complicating enforcement efforts.

The victims were left not only financially distressed but also without housing, as the scam often targeted individuals in urgent need of accommodation. This case illustrated the heightened risks in a competitive rental market, where demand outstrips supply.

In response to this case and similar incidents, housing authorities and consumer protection agencies highlighted a number of important counter-measures:

²⁹ BBC News item, London renting: '[We lost £13,000 in a fake agent scam](#)', 28 September 2023

1 Verification of managing/letting agents:

- Ensuring agents are registered with recognised industry bodies such as ARLA Propertymark and the [NRLA](#).
- Cross-checking property ownership with Land Registry records

2 Public awareness campaigns:

- Councils across London launched initiatives to educate renters about common red flags, such as overly attractive deals, high-pressure tactics and requests for large upfront payments

3 Improved legal protections:

- Advocacy groups called for stronger regulations around rental advertisements and identity verification for landlords and agents.

The London rental scam of 2023 serves as a cautionary tale about the risks of rental fraud. By leveraging competitive market conditions and advanced deception tactics, the scammer exploited tenants' trust and urgency. While law enforcement and local councils have taken steps to mitigate such risks, this case underscores the need for continued vigilance and tighter regulations in the PRS.

Case study: illegal money lending – Operation Shaddock³⁰

Richard Dawson, a 35-year-old Barnsley resident, was sentenced to seven years in prison in May 2024 for operating as an illegal loan shark and committing violent crimes against his borrowers. Dawson's illegal activities included lending money without the necessary authorisation from the [FCA](#), charging exorbitant interest rates and employing intimidation and violence to enforce repayments. His victims, notably a mother and her son, were subjected to severe abuse. The mother initially borrowed £5 in 2022, with Dawson demanding double repayment the following week and triple if delayed further, trapping her in a cycle of debt. The son also borrowed from Dawson, often surrendering his entire benefit payments. At times, he was forced to travel in the boot of Dawson's car to withdraw money from cashpoint machines.

CCTV footage revealed Dawson's coercion, showing him releasing the victim from his car boot at cashpoints. In one instance, the victim withdrew his entire benefit payment of £364.90 under duress. Dawson's violent enforcement methods included breaking the male victim's jaw during an assault and physically attacking the mother.

Known as Operation Shaddock, the investigation was conducted by the England Illegal Money Lending Team in collaboration with Barnsley Council's Safer Neighbourhoods Service and South Yorkshire Police. A warrant executed at Dawson's residence in February 2024 led to the seizure of incriminating items, including a bank card belonging to one of the victims. Financial analysis indicated that between 2020 and 2024 Dawson made 292 payments to 29 individuals, with many transactions labelled as 'loan' or 'lending'. These totalled over £52,000, excluding unbanked cash repayments.

At Sheffield Crown Court, Judge Recorder Adrian Langdale KC condemned Dawson's actions as an 'organised crime extortion racket', highlighting the 'cycle of debt and despair' he imposed on his victims. Dawson pleaded guilty to charges including illegal

³⁰ BBC News, ['Loan shark car boot kidnap like "Sopranos" – court'](#), 2 May 2024

money lending, money laundering, kidnap and multiple counts of assault causing grievous and actual bodily harm. His seven-year prison sentence reflected the severity of his crimes and the exploitation of vulnerable individuals in the community.

Case study: criminals sentenced for money laundering via fraudulent rental payments

In 2019, three London-based criminals were sentenced for their involvement in money laundering through fraudulent rental payments. The case highlighted how rental properties in the [PRS](#) were used as vehicles for laundering money obtained from various criminal activities. The investigation began after local councils and law enforcement agencies flagged suspicious activity in connection with rental properties linked to the offenders. The individuals involved had rented out several properties across London, using them to launder money through fake rental agreements. These agreements allowed them to move illicit funds into the legitimate financial system, making it difficult to trace the original source of the money.

The offenders included John Harris, a 45-year-old landlord, alongside his associates Mark Reed and Sarah Patel. Harris was identified as the key figure behind the operations, managing the fraudulent rental schemes. Reed and Patel acted as intermediaries, helping to create and manage fake rental contracts and bank transactions to conceal the source of funds. The case was investigated by the Metropolitan Police's Economic Crime Unit, with support from the [NCA](#). These agencies worked collaboratively to gather evidence linking the properties to money laundering activities. Investigators uncovered a complex web of financial transactions that appeared to target high-demand areas in London, making it difficult to identify the criminal operations without thorough analysis.

In March 2019, John Harris, Mark Reed, and Sarah Patel were brought to court following a detailed investigation. After the defendants had admitted their involvement in the scheme, the court sentenced Harris to eight years in prison for fraud and money laundering offences, while Reed and Patel received shorter sentences of six and four years respectively for their roles in facilitating the fraudulent operations. The court proceedings revealed that over £1.2m was laundered through the fraudulent rental payments. The illicit money was moved into bank accounts, used to purchase assets and reinvested in further fraudulent property ventures.

This case underscored the ease with which criminals have been able to use PRS properties as vehicles to support money laundering operations. The use of legitimate property transactions to conceal criminal funds is a growing concern, particularly as property prices rise and markets become more competitive for renters. Following this case, local councils and law enforcement agencies intensified efforts to monitor suspicious activity in the rental sector by:

- Introducing more stringent regulations to prevent the misuse of properties for illicit purposes
- Increasing collaboration with financial institutions to trace and freeze assets involved in suspected money laundering
- Promoting public awareness about identifying and reporting fraudulent property transactions.

C6: Cuckooing

In summary

- Cuckooing is a form of exploitation in which criminals take over someone's home to use it for illegal activities
- Vulnerable individuals, particularly people living alone, are often targeted
- Landlords may be directly or indirectly involved and must maintain proper oversight of their properties and tenants
- Local authorities should encourage landlords to remain vigilant and proactive in identifying potential signs of cuckooing
- Inter-agency collaboration is essential to tackle cuckooing, as there are often few visible exterior indicators
- While there is currently no specific legislation addressing cuckooing, there is a proposal to make cuckooing an offence under the new Crime and Policing Bill.

In detail

'Cuckooing' refers to a form of exploitation where criminals take over a vulnerable person's home – often without their consent – to use it for illegal activities like drug dealing or other criminal enterprises. The term is inspired by cuckoo birds, which lay their eggs in other birds' nests to be raised. Vulnerable individuals may include people who:

- are older
- have physical or mental health conditions
- live alone or are isolated
- are experiencing poverty
- have a drug and/or alcohol addiction.

There is currently no legal or single generally-agreed definition of cuckooing. It can manifest in several different ways, reflecting varying levels of control, manipulation and cooperation. It may be orchestrated by someone outside the property or within the household. In **quasi-cuckooing**, the victim retains some access to their home, but is manipulated into allowing criminals to use their property, often under false pretences or duress. Though less overt than traditional cuckooing, the victim is still very much a victim, because they are the object of coercion into facilitating illegal activities. For example, a person might be persuaded to let 'friends' use their home for short periods, not fully understanding or consenting to the illegal activities going on there.

Coupling-cuckooing takes on a more reciprocal or transactional form, where the victim receives something in return, fostering a sense of dependency and complicity. This dynamic can blur the lines between victim and participant, as individuals may not fully recognise the extent of their exploitation because of their reliance on these benefits. For instance, a drug user might allow their home to be used for drug dealing in exchange for a supply of drugs, thereby becoming both a victim and an active participant in the arrangement.

Other forms of cuckooing demonstrate even more complex dynamics between victim and perpetrator. **Hybrid cuckooing** involves multiple forms of criminal activity

occurring in the same residence. For example, the victim's home may be turned into a hub for diverse illegal enterprises such as drugs or firearms; a brothel; or even housing as part of human trafficking operations. In **reverse cuckooing**, the exploitation shifts to the person rather than the property. A vulnerable person might be lured into living with someone who then forces them into illegal activities, effectively 'cuckooing' the person rather than the property. Such activities may include forced labour or sex work.

Finally, in **proxy cuckooing** criminals use an intermediary to access the vulnerable person's home, rather than approaching the victim directly. This might involve using a third party to make introductions or to facilitate the takeover of the property. For example, a supposed 'friend' or 'carer' gains the trust of a vulnerable person and then introduces criminals who go on to exploit the individual and the property.

How landlords can be involved/implicated

Landlord involvement in cuckooing can be direct or indirect. Landlords can engage directly by knowingly renting out their property to individuals involved in illegal activities – such as drug dealers – for financial gain or out of indifference. Direct involvement makes landlords complicit in the exploitation, as they provide a safe space for criminals to operate, while turning a blind eye to the harm caused to vulnerable tenants and the wider community. Even when not directly involved, landlords can still be implicated through negligence or failure to maintain proper oversight. A landlord might be aware of suspicious activities but choose to ignore them, effectively enabling cuckooing through inaction. In other cases, inadequate property management – such as failing to conduct regular inspections – allows illegal activities to go unnoticed. In the most unethical cases, landlord involvement may take the form of *complicity*, where landlords receive bribes or other benefits in exchange for allowing their property to be used for illegal purposes. This unethical behaviour not only fuels criminal exploitation but also leaves landlords legally liable for any crimes being committed on their property.

Impact of cuckooing

Cuckooing in PRS properties has a significant impact on landlords, tenants and communities, as it often leads to property damage, legal issues and a rise in local crime. Exploiting vulnerable tenants not only harms the immediate residents but also creates an environment of fear and instability in the surrounding area. Victims of cuckooing experience psychological trauma and a loss of control over their living situation. For landlords, it can result in financial losses, reputational damage and legal consequences, if the issue is not addressed promptly. Additionally, the increase in crime associated with cuckooing can drive down property values and make it more difficult for responsible tenants to find safe housing.

Red flags: what to look out for

Spotting cuckooing in a property is often not that different from recognising other signs that a property is possibly being used for illegal activities or exploitation, including organised crime.

The key indicators to look out for include:

- **Sudden changes in tenant behaviour:** the person may appear more withdrawn, anxious or secretive. They may not be willing to engage or they seem scared or they may not even allow access to the property
- **Signs of physical deterioration or neglect in the tenant:** the victim may appear less cared for, exhibiting signs of neglect such as poor hygiene or deterioration in their living conditions
- **New faces:** a new 'friend' or 'carer' at the property – or frequent unfamiliar visitors – might be a sign of cuckooing, especially if other concerning behaviour is in evidence
- **Signs of drug activity:** a smell of strong chemicals or drug odours; drug paraphernalia such as needles, pipes or packaging material; open drug-dealing near the property
- **Physical changes to the property:** new locks on internal doors indicating that residents may not have access to all parts of their residence; increased security (including cameras); items that seem out of place; and general physical deterioration or damage that is out of the ordinary
- **An increase in anti-social behaviour:** noise disturbance and suspicious activity, especially as reported by neighbours and the community.

Response

Local authority housing enforcement teams play a vital role in responding to cuckooing in the private rented sector by ensuring properties meet safety standards; safeguarding vulnerable tenants; and collaborating with other agencies to disrupt criminal activity. Their response involves a combination of housing regulation enforcement, safeguarding vulnerable people, working with landlords and coordinating with police and social services to tackle the exploitation associated with cuckooing.

Details of how a housing enforcement team might respond are listed here:

1 Legal enforcement action

- **Using housing enforcement powers:**
 - If the property is in disrepair or does not meet the required safety standards, the housing enforcement team can issue improvement notices under the Housing Act 2004, requiring the landlord to fix the issues
 - If the property poses a risk, the local authority can take action under [HHSRS](#) to ensure the property is made safe or closed
 - In severe cases, the local authority may use emergency prohibition orders, preventing the use of the property until the hazards are resolved.
- **Licensing schemes:**
 - Local authorities have several licensing options to regulate the PRS and address issues such as poor property conditions, anti-social behaviour and criminal activity. Selective licensing applies to all private rented properties in a designated area where the council identifies significant problems, such as low housing demand or high levels of crime
 - Additional licensing targets [HMOs](#) not covered by mandatory HMO licensing, ensuring better management standards. Discretionary licensing allows councils to introduce tailored schemes to tackle specific local issues, helping improve housing conditions and tenant safety. These

licensing schemes enable local authorities to hold landlords accountable and drive up standards in the [PRS](#).

2 Engage with landlords

- **Landlord education and collaboration:**
 - The housing enforcement team can work with private landlords to help them identify signs of cuckooing and understand their legal responsibilities
 - Training and awareness campaigns provided to landlords can outline how to spot signs of criminal exploitation and how to report concerns.
- **Legal advice to landlords:**
 - If criminal activity is confirmed, the team may advise landlords on pursuing legal action to recover possession of the property, such as initiating an eviction process under the Anti-social Behaviour, Crime and Policing Act 2014 (via mandatory ground for possession), where there is evidence of drug-related crime or anti-social behaviour.

3 Safeguarding the tenant

- **Immediate safeguarding measures:**
 - If a tenant is found to be at risk, the housing enforcement team can coordinate with social services, the police and adult safeguarding boards to ensure that the tenant is moved to a place of safety
 - This may involve temporary accommodation or support through the local authority's housing team, particularly if the tenant needs to be rehoused quickly.
- **Multi-agency intervention:**
 - The housing enforcement team will likely work with community safety teams, drug and alcohol support services and mental health services to provide the necessary care and support for a vulnerable tenant
 - The team may also pay joint visits with the police and social services to offer support to the tenant, while addressing criminal exploitation.
- **Property inspection:**
 - The team may conduct a housing inspection to assess the living conditions of the property. This could include assessing for:
 - poor living conditions: health and safety risks such as damp, disrepair, fire hazards, overcrowding and inadequate facilities
 - signs of criminal activity: evidence of drug paraphernalia, structural modifications (e.g. reinforced doors) and unusual traffic in and out of the property.
- **Tenant welfare assessment:**
 - Housing officers will liaise with the tenant to understand their situation. However, victims of cuckooing may be too fearful to report exploitation, so officers may need to work with police or social services to determine if safeguarding measures are needed
 - If exploitation is suspected, a referral to the [NRM](#) for victims of modern slavery or trafficking may be considered.

4 Joint working with police and community safety partnerships

- **Information sharing:**
 - Housing enforcement teams need to work closely with the police (especially when criminal activity like drug dealing is involved) and share relevant information and intelligence
- **Criminal action:**
 - In confirmed cases of criminal activity, the housing enforcement team may support the police in preparing evidence for criminal prosecution, particularly if drug trafficking or gang-related exploitation is involved
 - The local authority or the police may apply for closure orders under the Anti-social Behaviour, Crime and Policing Act 2014 to temporarily close down properties being used for illegal activities.

5 Ongoing monitoring and support

- **Post-intervention monitoring:**
 - After interventions, the housing enforcement team may continue to monitor the property, working with landlords, the police and community safety teams to ensure that the property is no longer being exploited for criminal purposes.
- **Rehousing vulnerable tenants:**
 - If a tenant is unable to return to their property safely, the local authority may provide assistance in rehousing them, either through council housing or by helping them find another private rented property.
- **Prevention and education:**
 - The housing enforcement team may also be involved in preventative work, including educational campaigns for landlords, tenants and the wider community about the risks of cuckooing and how to seek help.

Partners to work with

Local authority housing enforcement teams can collaborate with a wide range of organisations and agencies to tackle cuckooing in the private rented sector. Because cuckooing is often linked to drug-related criminal activity and the exploitation of vulnerable individuals, it requires a multi-agency approach to address the problem effectively. A holistic approach will embrace both enforcement against criminal activity and safeguarding for vulnerable individuals. Key organisations local authorities can work with include:

- 1 **Police forces** – the police are at the forefront of tackling cuckooing, especially as it is often linked to criminal activities, such as drug trafficking and county lines operations. Cooperation might be facilitated and organised through general response or intelligence teams or through county lines task forces, neighbourhood policing teams and specialised units like organised crime units or anti-exploitation units.
- 2 **Social services** – a local authority's own social services department is essential in supporting vulnerable individuals who are being exploited by criminal gangs or individuals. They can provide safeguarding and support for people identified as at risk and develop intervention plans to ensure victims are rehoused or supported

in a safer environment. Such action may involve adult safeguarding boards, child protection services and mental health or addiction support programmes.

3 **Charities and voluntary sector organisations** – many of these focus on supporting vulnerable people and are essential partners in addressing cuckooing. They include:

- [Citizens Advice](#)
- [Shelter](#)
- [Mind](#)
- [Crisis](#)
- [The Big Issue Foundation](#)
- [St Mungo's](#)
- [The Salvation Army](#)
- [Centrepoint](#)
- [Depaul UK](#)

These organisations can help identify individuals at risk of exploitation, provide support services and act as intermediaries between vulnerable tenants and authorities.

4 **Landlords and other housing providers** – private landlords and other housing providers can play a key role in monitoring suspicious activity within their properties and reporting concerns to the authorities. Local authorities should work closely with them to educate them about cuckooing, to encourage reporting of unusual behaviour and to take forward eviction processes for tenants involved in criminal activities.

5 **Fire and rescue services** – vulnerable tenants living in properties that are taken over by criminals often face poor living conditions, which can pose fire hazards and other risks. The fire service can help assess the safety of properties being cuckooed. Local authorities can collaborate with them to ensure that homes meet safety standards or are closed if necessary.

6 Other agencies to work with include:

- Health and mental health services ([NHS](#) and local health providers)
- Community safety partnerships (CSPs)
- Local drug and alcohol services
- Gang and exploitation support services
- Modern slavery and human trafficking support agencies
- Neighbourhood Watch schemes.

Prevention

To prevent instances of cuckooing, local authority housing teams should encourage PRS landlords to be vigilant, to maintain ethical practices and to discharge all legal obligations on property management. If landlords suspect any form of exploitation or illegal activity, they should be encouraged to report it to their local authority or local police service and to take appropriate action to address the situation.

Landlords can play a crucial role in identifying and preventing cuckooing and in protecting their properties and tenants through:

- **Regular inspections:** regularly check properties to ensure they are being used as intended and to identify any signs of illegal activity
- **Tenant vetting:** conduct thorough background checks on potential tenants to reduce the risk of renting to individuals who may engage in or facilitate criminal behaviour
- **Education and awareness:** educate tenants about the signs of cuckooing and encourage them to report any suspicious activity
- **Communication:** maintain open lines of communication with tenants so they feel comfortable reporting issues or concerns
- **Collaboration with authorities:** work with local law enforcement and community organisations to stay informed about crime trends and best practices for preventing exploitation.

By staying vigilant and proactive, landlords can help safeguard their properties and contribute to community safety.

Sources of information

- University of Leeds – [Preventing and disrupting cuckooing victimisation: professional toolkit](#)
- West Yorkshire Police – [cuckooing advice video](#)
- [NCA – information on county lines drug trafficking and cuckooing.](#)
- [NRLA – guidance for landlords on cuckooing](#)
- University of Huddersfield – [An examination of the insights and experiences of cuckooing experts](#)
- University of Manchester – [Cuckooing: beyond the line](#)
- Newcastle Safeguarding Adults Board – video [Home takeover – targeted and trapped](#)
- [Victim Support](#) – provides specialist help for victims of cuckooing, focusing on safeguarding, legal support and emergency housing for people whose homes are being exploited by criminals.
- Shelter – offers [specific resources and training to professionals dealing with cuckooing cases](#), including legal guidance, signs to watch for and how to support vulnerable people whose homes are being exploited.
- The Centre for Social Justice (CSJ) – [Cuckooing: the case for strengthening the law against slavery in the home](#)

Legal framework

Although there are currently no specific laws directly targeting cuckooing, the Crime and Policing Bill contains draft provision to make cuckooing an offence. In the meantime, there are some key associated legal mechanisms and frameworks relevant to addressing illegal activities related to cuckooing:

Anti-social Behaviour, Crime and Policing Act 2014

Closure orders: under this Act, local authorities and the police can obtain closure orders for properties used in connection with serious criminal activity, including cuckooing. A closure order prevents the premises from being used for illegal purposes for a specified period.

Misuse of Drugs Act 1971

Drug trafficking offences: this legislation controls the production, distribution and possession of drugs. Individuals involved in drug dealing or using properties for drug-related activities can be prosecuted under the Act.

Proceeds of Crime Act 2002

Asset forfeiture: POCA allows for the seizure and forfeiture of assets obtained through criminal activity. It can be used against individuals and criminal enterprises involved in cuckooing.

Modern Slavery Act 2015

Exploitation: this Act addresses human trafficking and exploitation. If cuckooing involves the exploitation of vulnerable individuals, this law can be relevant, particularly in cases where individuals are coerced or trafficked into criminal activities.

Housing Act 1988 and Housing Act 1996

Tenant rights: these pieces of legislation govern rental agreements and tenant protections. While not directly addressing cuckooing, they provide a framework for tenant rights and landlord responsibilities, which can indirectly help in managing and preventing such issues.

Crime and Disorder Act 1998

Community safety: this Act provides measures for dealing with crime and anti-social behaviour. Local authorities can use the framework it establishes to address community safety issues related to cuckooing.

Local authority regulations

Housing and property management: local councils often have specific regulations and guidelines for property management. These may include requirements for regular inspections and enforcement actions against landlords who fail to manage their properties properly.

Regulatory and licensing requirements

Landlord licensing: in some areas, landlords must be licensed and comply with specific regulations to ensure proper management of rental properties. This helps in preventing properties from being misused for illegal activities.

Legal cases

Since there are currently no laws that specifically address cuckooing, legal cases involving this type of exploitation are typically prosecuted under related legislation, such as:

- Drug trafficking: the Misuse of Drugs Act 1971
- Modern slavery and human trafficking: the Modern Slavery Act 2015
- Criminal exploitation: through general criminal law, or sometimes with specific mentions in sentencing.

Included below are some relevant English legal cases where cuckooing was central to the prosecution.

R v Griffiths (2018)

This case produced a significant legal decision on cuckooing in the UK. In South Wales, the defendants targeted vulnerable individuals, in particular people dealing with addiction and mental health issues. They were manipulated into allowing their homes to be used for illegal drug activities, including the distribution of Class A drugs like heroin and crack cocaine. This exploitation involved threats and intimidation, creating a climate of fear that deterred victims from seeking assistance or escaping their predicament. The court upheld the convictions, emphasising the urgent need for laws specifically addressing cuckooing and highlighting the damaging effects on its victims.

R v Allen (2019)

In this case, the court addressed the serious issue of cuckooing within drug trafficking networks in the West Midlands. Allen and his co-defendants exploited the homes of individuals who were vulnerable on account of various factors, including addiction and social isolation. Coercive tactics and threats of violence were used as means to compel the victims to allow their properties to be used for drug distribution, trapping them in a cycle of fear and dependency. The court confirmed the original convictions, reinforcing the importance of protecting vulnerable individuals and recognising the increasing incidence of cuckooing in drug-related crimes.

R v Abdalla and others (2021)

The appeal case of *R v Abdalla and others (2021)* is significant for highlighting the exploitation inherent in cuckooing and county lines drug trafficking in Northampton. Abdalla and his co-defendants coerced vulnerable individuals into allowing their homes to be used as bases for distributing Class A drugs, such as heroin and crack cocaine. The use of intimidation and threats created a culture of fear that prevented victims from reporting their exploitation and from seeking help. The court upheld the original convictions, emphasising the seriousness of exploiting individuals in vulnerable positions and acknowledging the growing issue of cuckooing in drug trafficking.

R v Bell (2022)

R v Bell (2022) concerned cuckooing within drug trafficking schemes, primarily in London. The defendants manipulated and coerced vulnerable residents into allowing their homes to be used for the storage and sale of Class A drugs. Victims faced threats and intimidation, creating an environment of fear and dependency that hampered their ability to escape exploitation. The court affirmed the convictions of Bell and his associates, underscoring the need for targeted legal protections against cuckooing and acknowledging its increasing use in drug-related offences.

Key themes from cases:

- Exploitation of vulnerable people: cuckooing is usually targeted at individuals who are isolated or suffering from addiction or who have mental health issues – their vulnerabilities make it easier for criminals to control them and their properties
- County lines drug operations: many cuckooing cases are linked to county lines operations, where gangs from urban areas exploit properties in more rural or smaller communities
- Aggravating factor: in cases of drug trafficking or criminal exploitation, the courts often view the act of cuckooing as an aggravating factor, leading to harsher penalties for the offenders.

Cuckooing in the news

- [Cuckooing to be established as an offence in the new Crime and Policing Bill](#)
- [Crackdown on cuckooing in Bath](#)
- [Criminals took woman's house and turned it into drug den in Dundee](#)
- [New operation launched in Swindon to protect people against cuckooing](#)
- [Three arrested and drugs seized amid cuckooing concerns in Bishop's Stortford](#)
- [Newcastle programme tackling cuckooing, 'home takeover' and 'home invasion'](#)
- [Partial closure order for property to help victim of cuckooing](#)
- [Surrey-based charity says cuckooing is on the rise throughout the county](#)
- [Closure order placed on Rhyl property suspected of cuckooing](#)
- [Drug dealers jailed after cuckooing vulnerable man's home](#)
- [Drug dealer jailed after cuckooing vulnerable woman's home in Tamworth](#)
- [Police raid homes over cuckooing fears in Sheffield](#)

Case studies

Case study: sex worker cuckooed in her city centre flat

A female street sex worker in her forties lived in a privately rented one-bedroom flat under a secure tenancy. She had lived there for over 10 years and maintained a settled home life. Despite a history of Class A drug use, mental health issues and chronic health complications from a road traffic incident, she engaged with mental health services, received a monthly depo injection and was supported by drug and alcohol services and specialist street sex worker teams.

Concerns arose when outreach workers noticed she had stopped accessing their evening van for food and drinks. Other women visiting the outreach service mentioned staying at her property, which was unusual given her previously private disposition and domestic set-up with a long-term partner.

The private sector housing duty officer received a call from a neighbour reporting frequent visitors at all hours, including unfamiliar men in the building's communal areas. Some visitors were recognised as rough sleepers and individuals known for begging. Things escalated when police were called to an incident at the flat, where a known female street sex worker had been assaulted and where a window was broken during an altercation involving two men. Reports suggested weapons were involved and the men fled in a vehicle. Following these events, a PRS housing case officer was assigned to investigate and notified the landlord of the incidents.

Agencies supporting the victim noted her withdrawal from services, missed prescriptions and significant changes in her appearance and home environment. A visit to her flat revealed visible damage, including a hole in the door and a metal bar beside it. During a private conversation with her mental health worker, she insisted she only had friends visiting.

Residents reported noise, fighting, suspected drug activity at the flat and a rotation of unfamiliar men and other women engaging in sex work within the building. Given the escalating concerns, the PRS housing case officer convened a multi-agency meeting, where professionals agreed that the victim's home had been taken over. Her absence from support services and increased visible drug use further heightened concerns.

During a scheduled depo injection appointment, the PRS housing case officer and a mental health worker visited the victim. She disclosed that her home had been taken over and that she was being paid £60 a day and given access to Class A drugs. She admitted feeling unsafe and unable to control who entered her flat, and acknowledged the distress caused to her neighbours. She also revealed the presence of weapons, including machetes.

The PRS housing case officer arranged a private meeting away from her flat to discuss options. The victim was informed that the people exploiting her were criminals and that authorities recognised her vulnerability. She was made aware of potential consequences, including eviction and loss of benefits, but was assured that the PRS housing team and other agencies would work together to support her.

The case officer proposed a premises closure order to help her regain control of her home. The victim agreed and provided a statement. The PRS housing case officer referred the case to the anti-social behaviour team and they collaborated with law enforcement to gather intelligence, leading to a joint application for a closure order and a drugs warrant.

Police executed the warrant, made several arrests relating to drug supply and seized Class A and B drugs, imitation firearms, machetes and other weapons. The PRS housing case officer attended court and magistrates granted a three-month closure order, prohibiting unauthorised individuals from entering the flat. The case officer and

police attended the property to enforce the order, removing all individuals except the victim and her partner.

During the three-month closure order, the victim re-engaged with support services and took steps toward stabilising her life. The PRS housing case officer continued working with her to explore long-term housing options and ensure she remained supported in the PRS.

Lessons learned

- 1 **Early detection of exploitation:** outreach workers and neighbours played a crucial role in identifying signs of exploitation. Awareness and reporting mechanisms are essential for early intervention
- 2 **Value of multi-agency collaboration:** coordinated efforts between housing, police and support agencies were vital to addressing the victim's situation
- 3 **Support for vulnerable individuals:** the victim's circumstances highlight the importance of tailored support for individuals with intersecting vulnerabilities, such as mental health issues, substance use and housing insecurity
- 4 **Effective use of closure orders:** premises closure orders can be an effective tool for helping vulnerable tenants regain control of their homes, while addressing wider issues such as drug activity and anti-social behaviour
- 5 **Community awareness and reporting:** neighbours and local residents were instrumental in raising concerns. Community awareness initiatives could further enhance vigilance and reporting
- 6 **Safeguarding in complex cases:** this case underscores the importance of safeguarding thresholds that consider exploitation in non-traditional forms, such as cuckooing. Training and policy consistency across regions are essential for ensuring timely and appropriate interventions.

Case study: exploitation of a vulnerable man with brain injury

A man with a brain injury was placed in rented accommodation, where he became the target of exploitation. Recognised locally as vulnerable, he was initially befriended by two women who offered to help him with daily tasks such as shopping. Over time, the women gained his trust and then introduced him to a man they claimed would look after him while they were away. The victim, having no reason to suspect their intentions, trusted the man and allowed him into his life.

The man immediately began exploiting the victim. He stole the backdoor key and began letting himself and others into the property without permission. Gradually, the perpetrators took over the house. The victim was subjected to physical abuse. They tied him to a radiator, beat him and forced him to hand over money in stages from his bank account. The perpetrators used threats and coercion to isolate him, preventing visitors from entering the house. They escorted him to the door when visitors arrived and made him act aggressively to drive them away.

The victim's family observed changes in his behaviour but believed these were due to his brain injury. For their safety, the victim avoided disclosing the abuse to his family, further delaying any intervention. Over the course of two months, the house became a base for criminal activity, including drug use. The perpetrators armed themselves

with knives taken from the property and told him that any violence involving the knives would implicate him, ensuring his compliance and silence.

The situation remained undiscovered until an unexpected visit from a Red Cross worker, who was conducting a routine check related to the victim's brain injury. The worker noticed signs of distress and asked the victim to sign a form about his care. The victim wrote 'help' on the form, prompting her to act. She alerted the police, who intervened. The perpetrators were removed from the property, arrested and later prosecuted. The victim was rescued and provided with support.

Lessons learned

- 1 **Role of female offenders in grooming:** the women involved played a significant role in befriending and grooming the victim, creating a pathway for others to exploit him
- 2 **Preventing future cuckooing:** the property had a history of being involved in cuckooing incidents. No measures were in place to identify vulnerable tenants or prevent future occurrences
- 3 **Missed opportunities for intervention:** the victim had limited contact with services that might have identified the abuse. Health and social care services – particularly services working with individuals with brain injuries or other health conditions that make them more vulnerable – could enhance training to recognise signs of exploitation and better engage with families
- 4 **Lack of community awareness:** neighbours did not register what was going on, likely because they knew nothing about cuckooing. Raising community awareness about the signs of exploitation could help prevent similar cases.

Case study: cuckooing and exploitation of a vulnerable drug user

Cuckooing is often associated with individuals who use drugs and possess a home, two factors which make them vulnerable to exploitation. In one case, a male drug user – either a current or former user – was befriended by individuals involved in criminal activities. These individuals coerced him into allowing them to use his property, telling him that children working for their county lines drug operation would be staying with him. He was given no choice in the matter.

The perpetrators stored drugs in his living room and used his property as a base for their operations. Despite feeling intimidated and powerless, the man contacted his support worker and reported the situation, saying he wanted the people out of his home. The support worker alerted the police, who acted on the information.

Initially, the tenant and some of the children involved in the operation were arrested. However, further investigation allowed the police to identify the organised crime group responsible for running the county lines operation. These individuals were subsequently arrested and charged with offences related to drug trafficking and modern slavery.

Lessons learned

- 1 **Cuckooing tactics in county lines:** criminal groups often target vulnerable individuals with a home to use as a base for their operations and perpetrators groom and intimidate drug users into facilitating their activities
- 2 **Collaboration between support services and law enforcement:** the tenant's decision to contact his support worker was critical in bringing the situation to light, underscoring the importance of maintaining strong links between support services and law enforcement
- 3 **Modern slavery and youth exploitation:** teenagers forced to stay in the property were victims of modern slavery, demonstrating the intersection between cuckooing and the exploitation of young people. Identifying and supporting these victims is essential to breaking the cycle of exploitation
- 4 **Preventative measures for vulnerable tenants:** drug users and other vulnerable individuals require targeted support to prevent them from becoming victims of cuckooing.

Case study: exploitation of an elderly ex-minister in private rented housing

An elderly man in his eighties, a former church minister who had spent much of his life outside the UK, returned and rented a flat in the PRS. While out shopping one day, he encountered a female drug user who was begging for help. Compassionate and eager to assist, he invited her back to his flat to shower and clean herself up.

Believing he was doing her a favour, he began helping her regularly. Over time, her boyfriend also moved into his flat. They contributed minimally to the household, instead relying on the elderly man's resources to sustain themselves. He began buying things for them and giving financial assistance, which included gifting them substantial sums of money. The woman's pregnancy further motivated him to help, as he sought to support them in securing a new home. In total, he gave them over £11,000 – an amount he could not afford, leading him to use his credit card and incur debt.

Despite their own vulnerabilities, the couple exploited his good nature. The case highlights the challenges of addressing exploitation in instances where the victim is deemed to have capacity. It underscores significant challenges in safeguarding adults under the Care Act 2014.

A multi-agency meeting involving the local authority, police and social care concluded that no immediate intervention could be made, largely because of a lack of anti-social behaviour. The local adult social care department determined that the situation did not meet their safeguarding threshold, reflecting how different areas apply the Care Act differently. Some regions might treat a case like this with a measure of urgency; others might fail to act decisively, as in this instance.

The case was referred to a police officer from the economic crime unit for advice on the financial exploitation dimension. Since the victim was deemed to have capacity and had consented to the gifting of money, no offences could be identified. Adding to the challenges, the man's estranged daughter attempted to intervene by leveraging a power of attorney to prevent further financial harm. However, the man's resistance to being told he was in the wrong complicated efforts to protect him.

Lessons learned

- 1 **Disparities in adult social care responses:** the varying application of safeguarding thresholds across local authorities highlights the need for clearer national standards and more uniform training under the Care Act
- 2 **Inappropriate allocation of resources:** referring the case to an economic crime officer rather than a specialised adult safeguarding professional points up a lack of suitable response mechanisms
- 3 **Housing vulnerable people:** the couple involved were themselves victims of circumstance, highlighting the importance of providing housing and support services to vulnerable drug users. Greater effort could have been made to rehouse them or impose injunctions to limit their access to the elderly man's property
- 4 **Supporting the victim and family:** the man's estrangement from his daughter further complicated the situation. Building trust and improving communication between families and support services are critical in safeguarding adults who may be resistant to intervention
- 5 **Debt prevention and capacity considerations:** more proactive measures – such as financial management support and monitoring of credit use – might have prevented the elderly man from accruing significant debt.

D: Taking action

D1: Action local authorities can take

Introduction

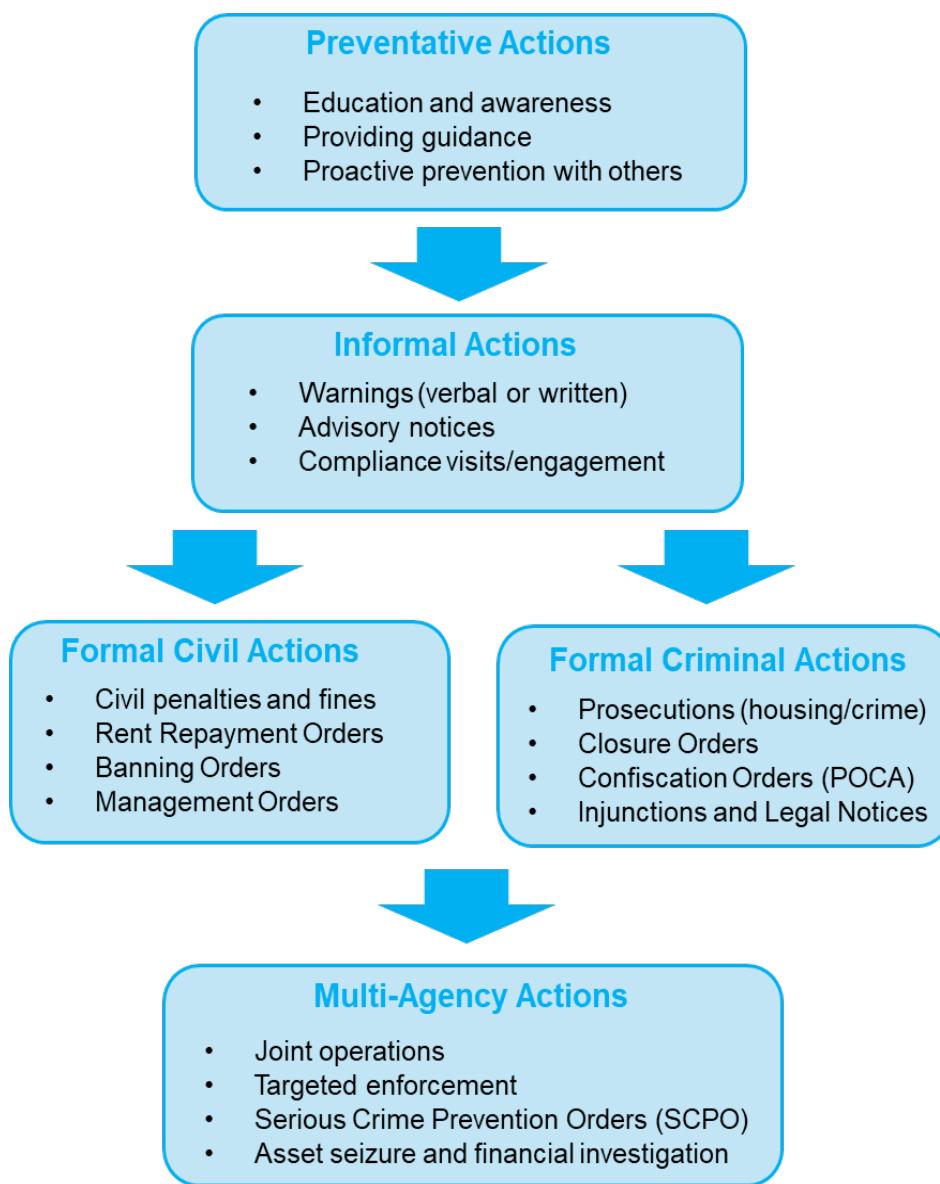
There are specific actions that local authorities can take when potential criminality is identified in [PRS](#) properties. Due consideration should be given to ensuring that any action taken is proportionate and consistent. Key factors include:

- The seriousness of the offence
- The evidence gathered
- The history of suspected offenders
- The level of will or intent involved in the criminal behaviour
- The impact of the offence
- How much responsibility is borne by the suspected offenders
- Meeting the evidential test
- The extent to which the public interest is served by specific actions.

Deciding on the best course of action to achieve the desired aims and objectives is crucial. This decision-making process should encompass consideration of not only formal enforcement or prosecution but also alternative approaches where appropriate. It is essential to work collaboratively with other agencies where appropriate to determine who is best placed to respond and which authority has the most suitable powers to achieve the intended outcomes.

Figure 5 shows that actions may range from education – to ensure landlords understand legal obligations and undertake appropriate practices – to informal measures such as warnings, and, where necessary, more formal civil or criminal actions either from the local authority or through joint action with other agencies (such as the police, Immigration Enforcement and Trading Standards). A strategic and coordinated approach to criminality helps ensure that the response is effective, proportionate and aligned with broader regulatory goals and the authority's enforcement policy. For optimum results, powers should be exercised appropriately and in good time. Where some actions may take a while to fulfil, other, more immediate steps can be taken to make life 'uncomfortable' for the people engaged in criminal activity.

Figure 5 – Actions local authorities can take to tackle criminality in their PRS



For detailed actions that can be taken for the main crime types encountered in PRS properties, see full guidance on:

- [Illegal drugs](#)
- [Modern-day slavery and human trafficking](#)
- [Sexual exploitation and brothels](#)
- [Rent-to-rent scams](#)
- [Housing fraud and financial exploitation](#)
- [Cuckooing](#)

Preventative actions

Aimed at reducing the likelihood of criminal activity within the PRS before formal interventions become necessary, preventative actions are a crucial part of an effective enforcement strategy.

Education and awareness campaigns play a key role in ensuring that landlords, tenants and property agents understand their legal responsibilities and the consequences of non-compliance. Landlord associations are often valuable partners in supporting these kinds of initiatives.

- **Providing guidance** on safe and lawful renting practices and highlighting issues such as property maintenance, tenant rights and landlord obligations are useful things local authorities can do to help landlords – through online resources, workshops and direct engagement with relevant stakeholders.
- **Proactive partnership working** with other council departments, external agencies – such as the police, Immigration Enforcement, HMRC, fire and rescue services – and regulatory bodies strengthens early intervention efforts. Information sharing agreements and joint initiatives help identify high-risk properties and individuals involved in organised criminal activity. This collaborative approach enables enforcement teams to take targeted action against potential offenders, while supporting legitimate landlords and tenants. By addressing issues before they escalate, preventative actions help to maintain housing standards, protect vulnerable tenants and disrupt criminal networks operating within the PRS. (For further information in this connection, see [Working with partners](#) and [Information and intelligence sharing](#).)

Informal actions

Informal actions serve as an early-stage intervention to encourage compliance and deter further offences without immediately resorting to formal enforcement. These measures are particularly effective where issues can be resolved through engagement and cooperation, helping to prevent escalation while still addressing concerns.

- **Verbal or written warnings** may be issued by local authorities to landlords, outlining breaches of housing or criminal legislation and setting clear expectations for improvement or corrective action.
- **An advisory notice** is typically an informal notice issued by a local authority, housing officer to tell landlords about concerns or potential legal actions relating to housing conditions. It is not an enforcement notice but serves as a warning or guidance before formal legal action may be considered. It is commonly used in connection with anti-social behaviour, property conditions, overcrowding/illegal occupation and issues relating to Housing Act compliance. Although an advisory notice does not carry legal enforcement on its own, failure to act on it may result in further legal steps.
- **Compliance visits/engagement** with landlords or managing/letting agents allows enforcement teams to assess conditions, offer guidance and encourage voluntary action to remedy issues. Informal measures are often the first step in a proportionate enforcement approach, helping to address problems quickly while maintaining a working relationship with property owners. However, if non-

compliance persists, escalation to formal enforcement actions may be necessary to ensure the required outcomes are achieved.

Formal civil actions

Formal civil actions provide enforcement teams with a range of legal tools to address non-compliance and criminality in the PRS without immediately resorting to criminal prosecution. These measures are designed to be proportionate and targeted, ensuring that landlords and property managers are held accountable for their actions while maintaining housing standards and tenant safety.

- **Civil penalties and fines** are used to enforce compliance with housing regulations and deter unlawful practices among landlords and managing/letting agents. They may be fixed penalty amounts or discretionary. Commonly used for more minor breaches, financial penalty notices (FPNs) typically involve smaller sums, whereas non-fixed civil penalties notices vary in amount depending on the offence.
- **Rent repayment orders (RROs)** are legal orders which allow local authorities to reclaim housing benefits or rent paid by tenants where a landlord has operated illegally – such as letting an unlicensed property or unlawfully evicting a tenant.
- **A banning order** prohibits landlords or agents from renting out properties or managing rental housing for at least 12 months, if they have committed a serious offence like unlawful eviction, operating unlicensed [HMOs](#) or failing to comply with housing laws. Banning orders are issued by the First-tier Tribunal following a local authority application. Offenders are added to the [Rogue Landlord Database](#). Breaching a banning order is a criminal offence, punishable by fines of up to £30,000 or prosecution and may result in a council take over property management. Under the new Renters' Rights Act, the maximum fine may be increased to £40,000.
- **A management order** is issued when a landlord has failed to comply with licensing or housing regulations and where the property has been mismanaged or left in a hazardous condition. This allows a local authority to take control of the property to ensure its proper maintenance and management. Interim management orders (IMOs), last up to 12 months and are used when a property is unsafe, unlicensed or linked to serious anti-social behaviour. Final management orders (FMOs) can last up to five years and are applied when long-term management intervention is needed. These civil actions serve as strong deterrents and provide encouragement for landlords to observe their legal responsibilities. They also equip enforcement teams with effective tools to disrupt illegal practices in the PRS.

Formal criminal actions

Formal criminal actions are available for serious or persistent non-compliance, particularly where landlords or property managers knowingly engage in illegal activities or place tenants at significant risk. These measures serve as strong deterrents and are often necessary when informal and civil enforcement actions have failed to achieve compliance.

Prosecutions can be brought against landlords or agents by the local authority under housing and criminal legislation for offences such as operating unlicensed properties, failing to comply with enforcement notices, fraud, money laundering, unlawful evictions and maintaining hazardous living conditions. Convictions can result in heavy fines, criminal records and, in serious cases, custodial sentences.

Closure orders issued under the Anti-social Behaviour, Crime and Policing Act 2014, enable the police or local authority to shut down a PRS property associated with serious criminal activity, including drug production, human trafficking, illegal brothels and anti-social behaviour, preventing further harm to the community. The process begins with a closure notice, which can be issued by a police inspector or local authority officer. This restricts access for up to 48 hours. If the case is taken to the magistrates' court and a closure order is granted, the measure can have effect for up to three months (extendable to six), barring unauthorised individuals from the property. Breaching the order is a criminal offence, punishable by imprisonment or fines. Closure orders can work alongside other enforcement actions, such as banning orders, management orders and licensing revocations, ensuring landlords regain control and properties are returned to lawful use.

Confiscation orders under [POCA](#) allow the courts to seize financial gains made from criminal activity, including PRS-related offences, such as unlawful [HMO](#) operation, fraud and serious housing offences. Local authorities cannot apply directly for a confiscation order but can work with the police or [NCA](#) to investigate offences and refer cases to the [CPS](#). If a landlord is convicted of a relevant offence, the court can issue a confiscation order, requiring them to repay criminally obtained profits and enabling enforcement action for failure to comply.

Injunctions and legal notices may also be pursued to compel landlords to take specific actions, such as repairing hazardous properties or ceasing illegal activities. The use of these measures is particularly important in cases involving the most exploitative offenders, including the ones who engage in fraudulent practices, run unsafe rental properties or fail to address serious tenant abuse. Injunctions and legal notices are vital tools for authorities to help ensure that landlords take immediate action to improve conditions and stop harmful behaviour.

Disruption of organised crime through a multi-agency approach

Addressing organised crime and certain types of criminality within the PRS frequently requires a coordinated multi-agency approach, leveraging the expertise, intelligence and enforcement powers of various organisations to achieve target outcomes. Local authority enforcement teams work closely with agencies such as the police, fire services, Home Office Immigration Enforcement, [HMRC](#) and other regulatory bodies to identify and disrupt criminal networks operating within rental properties. (For further information in this connection, see [Useful external organisations to partner with](#) and [Building effective partnerships](#).) Joint operations are a key tool, allowing agencies to [share intelligence](#) and conduct coordinated enforcement actions against [serious offences](#) such as human trafficking, drug production, money laundering and fraud.

Conclusion

Local authorities play a crucial role in addressing criminality within the PRS through a range of strategic, proportionate and coordinated actions. By drawing on an array of preventative, informal and formal measures, local authorities can tackle and disrupt a wide spectrum of criminal behaviour, ensuring tenant safety and maintaining housing standards. The decision-making process – which includes careful consideration of the severity of offences, historical behaviour and public interest – enables authorities to apply the most appropriate enforcement tools. Whether through education, civil penalties, management orders or more serious criminal actions, local authorities have a robust toolkit to protect vulnerable tenants, to disrupt illegal activities and to ensure that landlords honour their legal responsibilities. Working collaboratively with external agencies enhances these efforts, providing a multi-agency approach that addresses organised crime, housing exploitation and other serious issues within the PRS. Ultimately, the consistent and fair use of these powers contributes to a safer, more equitable housing environment for everyone involved.

D2: Enforcement models

Introduction

The model summarised in Figure 6 has been developed based on insights gathered through interviews with local authority officers. It offers a practical reflection of their real-world responsibilities and approaches in housing enforcement. The model categorises the various levels of enforcement undertaken by local authority housing teams to address issues in the [PRS](#). The typology captures the breadth of actions employed to tackle housing conditions, safety concerns and breaches of housing regulations. Additionally, it accounts for efforts to combat criminal activities, including organised crime, emphasising the critical role of enforcement in safeguarding tenants and maintaining community standards.

By setting out 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.

Figure 6 – Enforcement models



(Goldstraw-White (2025))

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.

The model levels

Level 1: reactive housing enforcement. This level represents a basic, reactive approach to housing enforcement. Local authorities operate primarily in response to complaints raised by tenants or 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. If issued at all, civil penalties are rare and typically reserved for the most blatant violations. There is a narrow focus on immediate housing concerns without consideration of broader systemic or criminal issues that may impact tenants and communities. This approach may be shaped by resource constraints. The low level of engagement may also have to do with a lack of managerial or political will, a lack of awareness of the problem and/or having no defined strategy in place to address it.

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 affecting 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. Demonstrating a willingness to act against landlords who fail to meet their obligations, local authorities use civil penalties and other enforcement actions as tools to address non-compliance. However, at this stage, authorities may not fully recognise the presence of criminal activity within the PRS or give it priority. 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 on the proactive housing enforcement approach set out for Level 2, incorporating additional responsiveness to criminal activity within the PRS. Local authorities continue to inspect properties actively, to enforce housing standards and to 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 organised crime. During inspections and investigations, they proactively look for signs of criminal activity, for example modern slavery, drug-related operations and other forms of exploitation such as 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, the Gangmasters & Labour Abuse Authority (GLAA) and Immigration 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. By addressing the root causes of both housing breaches and criminal behaviour, local authorities at this level ensure a safer and more secure environment for tenants, while holding landlords and criminal networks accountable for their actions.

Summary

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.

The progression through the levels underscores the importance of collaboration and resource-sharing and emphasises 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. Ultimately, this framework serves as both a diagnostic tool and a roadmap for local authorities, enabling them to measure their current enforcement efforts, identify areas for improvement and work toward achieving a balanced and effective strategy that reflects the diverse needs and challenges of the PRS.

D3: Identifying who is liable in cases of criminality in the private rented sector

Landlords using their properties as a base for serious criminal activity will often (unsurprisingly) attempt to hide their identity to avoid detection and action against them. When officers are trying to establish who should be pursued for enforcement action, it is rarely as simple as finding out who the landlord is. The definition of a 'landlord' is complex. There is currently no universal definition in law: the specific statute that applies will vary according to context. This ambiguity and uncertainty can be exploited by criminal landlords to help them evade identification, enforcement action and prosecution. Set out below is a basic overview of how 'landlord' is defined in law and where ambiguity can arise – and be exploited. It goes on to show the different ways in which criminals often seek to avoid being identified.

Definitions of 'landlord'

The principal definitions under common law and various statutes are:

- **General definition in tenancy law:** under tenancy law, a landlord is typically defined as the person or entity that grants a tenancy and has the legal right to receive rent under a tenancy agreement. The Landlord and Tenant Act 1985 refers to a landlord as the person who has granted a lease or tenancy and is entitled to receive rent. It also outlines specific obligations on landlords, such as repair and maintenance duties
- **Housing Act 1988:** this Act governs most private tenancies in England and Wales and defines a landlord in the context of assured and assured shorthold tenancies (ASTs). A landlord is the person who grants the tenancy or is entitled to possession of the property after the tenancy ends. Although the Renters' Rights Bill contains draft provision to introduce substantial changes to tenancy laws, it does not redefine the term 'landlord' as established in the Housing Act 1988
- **Housing Act 2004:** this Act clarifies related roles (particularly with regard to [HMOs](#) and the licensing powers and duties it introduced) as:
 - *landlord* as the person who owns the property and rents it out
 - *person managing* as someone who manages the property and ensures compliance with regulations on behalf of the landlord (for example, a letting agent or property manager)
 - *person having control*, who is often synonymous with the landlord, as the person entitled to receive rent
- **Older Acts:** in older related primary legislation such as the Rent Act 1977 and the Protection from Eviction Act 1977, the landlord is described as the person who owns the property and has granted a tenancy or is otherwise entitled to receive rent.
- **Case law and legal interpretation:** where statutory definitions are not explicit, courts rely on the common law meaning, where a landlord is defined as 'the person

or entity who owns or controls a property and grants another person or entity the right to occupy it in exchange for rent or other consideration'.

Landlord, person managing and person having control

In its introduction of the concepts of *person managing* and *person in control*, the 2004 Act provides probably the greatest opportunity for obfuscation on who is liable for any civil or criminal action. The person managing will usually be charged with overseeing practical management and maintenance functions for a property on behalf of the owner – a managing agent may fulfil this role. A person in control holds a significant legal or financial interest in the property, usually as the owner or leaseholder. This will usually be the person who should be pursued for criminal action. A person managing can be pursued for certain issues such as safety breaches , but ultimately the person in control will be liable. This is seen in terms of licensing, in which the person in control will be responsible for ensuring a property has a licence, if it requires one.

This reasonably straightforward distinction can, however, be blurred by who is receiving rent. Section 263 of the 2004 Act defines the person in control as the person who actually receives the rent – in other words, the person who receives it into their bank account – regardless of whether they are receiving it for someone else or keeping it for themselves. In a scenario in which multiple tenancies for the same property have been created (for example, under a rent-to-rent arrangement), a person who receives the rent as, or on behalf of, a landlord would meet the definition of a person in control, provided the amount received is the rack rent (ie, a rent representing the full open market annual value of a holding) for the property.

Case law is continuing to evolve on the question of how different roles are defined under the Housing Act 2004. It is important that the specific circumstances of each case are carefully considered to determine who is actually performing which role. An individual may fall under more than one of the definitions set out in the Act.

Examples of practices used by criminal landlords to evade identification and/or action

Here are some of the methods criminal landlords have been known to use to evade the authorities:

- rent-to-rent agreements, arrangements in which a tenant will sublet a property to another individual in an attempt to distance the landlord/person in control from liability. For more detail on this, see section on [rent-to-rent scams](#)
- deliberately not updating the Land Registry record or not providing the correct details, such as their address. This is critical because the Land Registry is the only source available for determining who is the owner of a property
- falsely claiming that family members live at an address rent-free but are not able to prove. or are unwilling to provide information to substantiate it. This means they are able to avoid housing legislation and falsely claim exemptions to licensing under the 2004 Act
- claiming to operate Airbnb type occupancies (with no tenancy agreements) while people are living there longer term as their main residence. Because these types of occupancy fall outside the scope of housing legislation, they provide criminals

with below-the-radar opportunities to set up their operations – such as pop-up brothels and human trafficking – and to relocate them before enforcement agencies are able to intervene

- claiming not to receive the ‘rack rent’ (ie, two-thirds of the rent), receiving a reduced rent on paper and the rest in cash. If the [LHA](#) cannot prove that a person receives the rack rent it cannot conclusively prove that they are the person in control, thus frustrating their ability to take enforcement action
- avoiding paper trails by, for example, not issuing a tenancy agreement or asking for rent payment in cash – making it difficult to trace who the landlord/person in control is
- setting up multiple companies with similar names but using a generic name to obscure which company is actually in control of the property. For example, companies are established with the names CCC Ltd, CCC LSX, CCC City Centre etc, but the people behind them refer to themselves as simply CCC, thereby obscuring who the person in control of the property actually is
- closing down and setting up new companies overnight
- using false tenancy details or documents – such as forged passports – to avoid suspicion about the property's use and owner's occupation. By submitting fraudulent documentation, individuals can falsely claim housing benefit and council tax support, assert that empty properties are occupied or shift council tax liability to another person. This deception helps them avoid detection and enables criminal activity to continue unchecked
- using bogus or shell companies, often supported by fake websites, in order to obscure ownership and avoid scrutiny
- setting up front organisations, for example, high street offices that display the same properties in the window but never open or actively manage any lettings. These fronts enable money laundering through companies that do not genuinely let properties but appear to do so on paper. They may also conceal the true owner behind a series of seemingly legitimate shell companies, making it more difficult to trace laundered funds
- using PO Boxes instead of physical addresses, making it difficult to establish a point of contact or trace those responsible
- supplying different information to different agencies, for example, submitting one version of a tenancy agreement to the local authority for council tax purposes and another to the [DWP](#) for the same property. This enables landlords to make multiple fraudulent benefit claims for a single property.

Conclusion

Criminals exploit the various definitions of landlord found in common law and legislation to make it as difficult as possible for enforcement action to be taken against them. They also employ a range of scams and ruses to evade and disrupt councils' efforts to address standards in the PRS. There are significant challenges involved in identifying who is legally liable – an essential step if those using the PRS for criminal purposes are to be held accountable. Given the complexity of the legal framework surrounding the identification of a landlord or person in control, it is always advisable for housing officers to seek guidance from their authority's legal team on such matters.

D4: Managing/letting agents

Introduction

Managing/letting agents are professional individuals or businesses that act on behalf of landlords or property owners to manage rental properties and oversee tenant-related tasks. Landlords may prefer to use the services of an agent to reduce the time they spend managing their property and to ensure they comply with legal requirements related to letting.

Managing/letting agents should act legally and ethically towards their clients by complying with housing laws, maintaining transparency in financial transactions, protecting tenant rights, ensuring fair treatment and adhering to professional codes of conduct set by regulatory bodies.

They can also play a significant role in identifying, preventing and addressing criminal activity in [PRS](#) properties and should work in collaboration with local authority enforcement teams who can take whatever action is appropriate. However, some managing/letting agents exploit their access to properties and tenants to engage in illegal activities or even establish themselves as agents solely for that purpose.

How managing/letting agents can be involved in criminality in the PRS

Managing/letting agents can, like landlords, be involved in various criminal activities in the PRS, including fraud, illegal evictions and unsafe lettings. However, their unique position as intermediaries between landlords and tenants gives them additional opportunities to allow, facilitate or actively participate in criminality even against the landlords they represent.

By far the biggest concern, however, is their involvement with organised crime networks, where they may turn a blind eye to illegal activities, knowingly rent properties to criminals or even establish themselves as letting agents solely to service organised crime operations and be part of the criminal group. There is also the possibility that organised crime groups themselves could set up as fake lettings agents as a front for their criminal activities.

Interestingly, a major tenant support organisation has observed an increase in the number of managing/letting agents involved in criminality but no corresponding increase in prosecutions of agents for their involvement. [Safer Renting](#) has identified that where raids on brothels or a property used for human trafficking were being undertaken, in the vast majority of cases a managing/letting agent was involved.

Involvement in organised crime

Some managing/letting agents may knowingly ignore criminal activity going on in their managed properties. They may do this for financial gain or to avoid conflict with tenants, landlords or others. This disregard for legal and ethical responsibilities often involves failing to report clear signs of illegal activities, such as [drug production](#) (e.g. cannabis farms), [human trafficking](#) and various other forms of exploitation. By turning a blind eye, they allow criminal enterprises to continue operating undisturbed, putting vulnerable individuals at risk and contributing to the perpetuation of illegal activities in the PRS.

From a legal standpoint, managing/letting agents who facilitate organised crime in rental properties risk severe consequences under the Serious Crime Act 2007, including criminal prosecution, imprisonment and hefty fines. They may also face civil penalties such as licence revocation and financial sanctions, as well as reputational damage that leads to blacklisting and business loss. Authorities can issue confiscation orders under [POCA](#) and seize any illicit profits. Additionally, agents found complicit may face professional disqualification, preventing them from working in property management in the future.

Instead of conducting proper due diligence on tenants, corrupt agents may knowingly rent properties to criminals, effectively providing organised crime groups with secure locations to carry out illegal activities. In some cases, these agents may also accept large cash payments without keeping proper records, deliberately avoiding any financial transparency to prevent detection or scrutiny from authorities.

Some set up as agents purely to service organised crime groups. These 'ghost' letting agencies thereby ensure that their OCG associates have a steady supply of properties without interference from legitimate landlords or authorities. They often use fake paperwork and false identities to cover their tracks.

These agents thrive in a climate of secrecy, where authorities or legitimate landlords are unaware of their involvement, and they often exploit loopholes in the system to support the interests of criminal networks. It is sometimes difficult to get behind these agents as they set themselves up anonymously without a physical office or public-facing contact details. They often use PO Boxes, live abroad or register companies under family members' names. This can make detection and prosecution incredibly challenging.

Involvement in other areas of criminality

Outside of organised crime, lettings agents may also get involved in:

- **False advertising** – misrepresenting property conditions or availability
- **Working with forged documents** – using fake tenancy agreements or identity documents to facilitate [fraud](#)
- **Defrauding landlords** – overcharging or inflating fees (management, maintenance or repair costs); charging hidden fees (for services like marketing or repairs); neglecting responsibilities (failing to undertake activities that are charged for)
- **Involvement in subletting scams** – renting properties and illegally subletting them for profit. (For more detail on this, see section on [rent-to-rent scams](#))
- **Identity theft** – using tenants' personal information for fraudulent purposes, such as taking out loans in their name
- **Illegal evictions** – forcing tenants out without following the proper legal process, sometimes through harassment or threats
- **Breaches of tenant/landlord rights** – such as failure to maintain safety standards and gaining unauthorised access without proper notice or permission
- **Fraudulent deposits** – taking tenant deposits and not protecting them in a government-approved scheme
- **Rent misappropriation** – collecting rent and failing to pass it on to landlords
- **Letting unsafe properties** – ignoring legal safety requirements, such as gas, fire and electrical standards

- **Tenant discrimination** – illegally refusing to sign up tenants because of their race, nationality, disability or other protected characteristics
- **Tax evasion** – underreporting rental income or failing to declare fees to evade taxes
- **Benefit fraud** – using properties without the owner's knowledge to claim any type of benefit they are not entitled to.

How managing/letting agents can support local authorities in tackling criminality in the PRS

There are a number of ways in which managing/letting agents can collaborate with local authority PRS housing enforcement teams to tackle criminality and organised crime in PRS properties:

- **Flagging high-risk properties:** identifying and reporting activities that may be linked to criminality (such as drug production, human trafficking and money laundering) plus other suspicious behaviour, including high tenant turnover, use of false identities and dubious subletting arrangements
- **Commercial properties:** sharing any suspicious behaviour relating to PRS properties identified through commercial lettings (ie, any observed during visits to shops, restaurants, cafes, nail bars, garages, barbers etc)
- **Assisting with targeted investigations:** cooperating with law enforcement during investigations and providing access to property records, tenancy agreements and payment histories
- **Preventing exploitation of the PRS:** adhering to anti-money laundering (AML) regulations and thereby helping close gaps that criminals would otherwise exploit (such as renting properties under aliases or channelling illicit funds through rental payments)
- **Building awareness in the property sector:** engaging with local authorities and AML supervisors to help develop a culture of compliance in the PRS that makes it harder for criminal enterprises to operate.

Case studies

Case study: Barnet Council Trading Standards/Martin Marcus

In 2016, action was taken by Barnet Council's Trading Standards team against a fraudulent letting agent, Martin Marcus, who had defrauded both tenants and landlords out of significant sums of money. Marcus was tried at Harrow Crown Court for stealing £221,000 from more than 60 victims. Over the course of his criminal activities, Marcus had set up multiple letting agencies under various aliases and employed a range of deceptive tactics. These included offering tenants properties that he did not have the legal right to rent, taking multiple deposits from different tenants for the same property and carrying out rent-to-rent frauds, where he illegally sublet properties to tenants without the consent of the landlords and pocketed the extra rental income.

An investigation into Marcus's financial activities revealed irregularities in his bank accounts, where numerous non-client-related payments were being made. Further analysis showed that Marcus was in serious financial trouble: he had taken out numerous payday loans in an attempt to cover his debts. These findings painted a

clear picture of a man using fraudulent practices to prop up a failing business and cover his personal financial difficulties.

Martin Marcus was eventually convicted on five counts of fraud and was sentenced to four-and-a-half years in prison. Four other individuals – Nadim Khan, Michael Page, James Day and Stacey Heffernan – were found not guilty of the same charges, while Marcus' wife, Corinne Marcus, was acquitted of a money laundering charge.

Lessons learned

- 1 **Vigilance in identifying false agencies:** the case highlights the importance of verifying the legitimacy of agents and their operations, particularly when multiple aliases or business names are used. Authorities should be alert to agencies that appear to operate without transparency
- 2 **Tenant and landlord protection:** tenants and landlords need to be educated about the risks of dealing with unregistered or unregulated agents. Clear guidelines on how to identify legitimate agents and report suspicious activities can help reduce exposure to fraud
- 3 **Financial audits for agents:** routine financial checks and audits of agents' business practices can help identify irregularities, such as misuse of client funds or the presence of personal financial struggles that may lead to fraudulent activities
- 4 **The importance of proper documentation:** ensuring that tenancy agreements, deposits and rent transactions are properly documented and safeguarded can prevent agents from exploiting tenants and landlords. Transparency in financial dealings is key to avoiding fraud.

Case study: Anderson Estates

In January 2021, a three-year investigation was launched into an organised crime group after police officers discovered at a property in Hull approximately £74,000 worth of Class B drugs, alongside equipment linked to cannabis production. The investigation quickly turned its focus to an estate agency, later identified as Anderson Estates, which was found to be a front for a multimillion-pound drugs operation. The agency, located on Newland Avenue in Hull, never truly functioned as a legitimate business. Instead, it displayed fake advertisements and images in its shop window to create the illusion of an active real-estate operation.

One of the gang members, Jeremy Southgate, was running the fake agency. Southgate purchased properties at auctions for low-value cash sums, later falsifying ghost tenant documents to conceal the illegal use of the properties. Florjan Kasaj, another gang member, would 'manage' these properties, directing other members of the gang – Ervis Mrisgaj and Dardan Mrishaj – to transform them into cannabis farms, which were then staffed with illegal immigrants. In a further attempt to evade detection, Southgate fraudulently obtained government grants for insulation, which was installed in the properties to help conceal the cannabis production from authorities.

The operation came to a head when police raided several properties linked to the gang. The four key members – Kasaj, Mrisgaj, Mrishaj, and Southgate – were arrested. Kasaj, Mrisgaj and Mrishaj were convicted of conspiracy to produce Class B drugs, receiving prison sentences of seven, five-and-a-half and three years respectively. Southgate, the mastermind behind the operation, was convicted of

conspiracy to produce Class B drugs, money laundering and fraud by false representation. He was sentenced to 11 years in prison. Additionally, a fifth man, Enver Rushi, was jailed for three years for two counts of producing cannabis. Ten others were charged with drug-related offences and convicted.

Lessons learned

- 1 **Scrutinising letting agencies:** the case highlights the importance of thoroughly vetting managing/letting agents and estate agencies to ensure they are not fronts for criminal operations. Authorities should look beyond surface-level appearances and investigate the true activities of such businesses
- 2 **The role of property in crime:** properties purchased at low prices, particularly through auctions, can sometimes serve as key assets for illegal activities. There is a need for heightened vigilance in monitoring these kinds of transactions and identifying potential criminal intent
- 3 **Use of government grants for illicit purposes:** criminals may exploit government schemes, such as insulation grants, to further their illegal activities. Ensuring proper checks and audits of applications for grants can help prevent this kind of misuse
- 4 **Cooperation between agencies:** investigations into organised crime need coordination between law enforcement and regulatory bodies, particularly in sectors like housing, where criminals may attempt to hide their activities behind legitimate businesses.

Case study: Platinum Homes

In 2023, Ossama Omar and Mohamed Latif, estate agents employed by Platinum Homes in Leicester, were convicted at Leicester Crown Court for their roles in a large-scale cannabis production operation. Both men were found guilty of conspiring to produce Class B drugs (cannabis) and were sentenced to seven years and five-and-a-half years in prison respectively. Three others – Wesley Moden, Besmir Kortoci, and Gazmend Kortoci – were also convicted and sentenced for their involvement in the criminal enterprise.

The arrests followed police raids carried out in March and April 2020 across 15 properties linked to the [OCG](#). Investigators discovered active cannabis farms in 13 of the properties, with evidence of prior drug cultivation in the other two. The drugs seized during the raids had an estimated street value of £3.8m. Police estimated the operation had the potential to generate £7m a year.

The success of the illegal enterprise was largely attributed to the roles played by Omar and Latif. As estate agents, they facilitated fraudulent tenancy agreements, giving the criminal group the appearance of legitimacy. By manipulating rental arrangements, they enabled the cannabis operations to function undetected, allowing criminals to establish sophisticated drug farms within residential properties. This collaboration between professionals in the property sector and criminal networks highlights the increasing complexity of organised crime operations.

Lessons learned

- 1 **Strengthening regulatory oversight:** this case underscores the need for stricter oversight and due diligence within the real estate sector. Enhanced background

- checks on tenants and landlords, as well as greater scrutiny of rental agreements, can help prevent abuse by criminal enterprises
- 2 **Training and awareness for property professionals:** estate agents and property managers should receive training on how to identify and report suspicious activities, such as properties with unusually high electricity usage, covered windows or low tenant presence
 - 3 **Collaboration between law enforcement and the property sector:** establishing stronger communication channels between estate agencies, landlords and law enforcement can facilitate early detection of illicit activities and prevent criminals from exploiting rental properties
 - 4 **The role of professional integrity:** this case highlights the dangers of professionals engaging in illegal activities for financial gain. Ethical conduct and accountability are vital in preventing individuals from becoming enablers of organised crime
 - 5 **Impact on local communities:** large-scale cannabis operations not only contribute to illegal drug distribution but can also lead to increased criminal activity, property damage and safety hazards in communities. Preventative measures must be taken to mitigate these risks.

Case study: Operation Baseend – R v Neatu, Nedelcu and Debnath

In early 2023, West Yorkshire Police executed search warrants at several addresses and discovered multiple cannabis farms. Enquiries identified a single property management agent, SD Trading Leeds Ltd, as the company responsible for the day-to-day running of these properties. The director of this company was Sayan Debnath.

This information was passed to the criminal landlord unit (CLU) at Leeds City Council (LCC). CLU officers were able to provide additional information about the addresses and other properties recorded as being managed by SD Trading Leeds Limited. Additionally, another managing agent was found to be linked to SDF Trading – Comfort Home Lets Ltd, whose director was Mirel Bogdan Neatu.

The discovery of this information enabled the police and LCC to work together to develop intelligence on other properties managed by these two companies. The CLU was able to identify several landlords who had entrusted multiple properties to these managing agents. It became increasingly clear to both the police and LCC which landlords were likely complicit or, at the very least, turning a blind eye to the activities taking place within their properties.

As more cannabis grows were uncovered, the volume of information also increased. Two further managing agents became suspected of complicity in working alongside SD Trading and Comfort Home Lets. One of these was Marius Cristian Nedelcu of Perfect Home Lettings Ltd.

In March 2024, officers executed warrants in Leeds and carried out arrest enquiries in Coventry, resulting in the detention of these men and a fourth individual. Several landlords whose properties had been used by the managing companies to facilitate cannabis production provided statements against the three company directors. They were subsequently charged with conspiracy to produce a Class B drug and with acquiring, using or possessing criminal property.

The three men were identified as having operated property management companies that obtained properties from legitimate landlords under the guise of offering

management services, but in reality allowed [OCGs](#) to establish large-scale cannabis farms.

These companies were linked to 75 cannabis farms operating in residential properties – with an estimated street value exceeding £4.5m.

At a hearing at Leeds Crown Court in January 2025, Mirel Neatu, Marius Nedelcu and Sayan Debnath pleaded guilty to an alternative charge of permitting premises to be used for the production of a controlled drug, contrary to section 8(a) of the Misuse of Drugs Act, in relation to some of the properties involved. No evidence was offered against the fourth defendant and he was acquitted.

Neatu, of Leeds, was sentenced to 32 months in prison; Nedelcu, of Coventry, received a 28-month custodial sentence. Debnath, also of Leeds, was handed a suspended 21-month prison sentence, along with 300 hours of unpaid work and a 12-week night-time curfew.

Lessons learned

- 1 **Involving the right agencies early in the investigation:** law enforcement should identify partner agencies that can positively contribute to the investigation and include them from the outset
- 2 **Cooperation between agencies:** investigations into organised crime need coordination between law enforcement and regulatory bodies – particularly in sectors such as housing, where criminals may attempt to conceal illegal activities behind legitimate businesses
- 3 **Importance of the ability and willingness to share information:** it is essential that information relating to suspected offences, individuals and addresses is shared across all investigating organisations. It is highly unlikely that any single regulatory body will possess all the information necessary to advance and prove the case.

Summary

Managing/letting agents can be involved in criminality in the PRS both directly and indirectly, particularly in relation to organised crime. Whether by knowingly facilitating illegal activities, such as housing criminal enterprises, or by turning a blind eye to criminal behaviour within the properties they manage, they can significantly impact the integrity of the housing market. However, agents also play a crucial role in identifying and reporting suspicious activities. Their local intelligence is vital to local authority housing enforcement teams. By working together, these teams can address criminality in the PRS, ensuring safer, more regulated environments for tenants. Once the forthcoming Renters' Rights Bill comes into force, it will be more important than ever that the sector has lettings agents that are professional and can be trusted.

D5: Using the Serious Crime Act 2015 to tackle serious and organised crime with partner agencies

Background

The Serious Crime Act 2015 defines and reinforces laws related to organised crime, including activities involving financial gain through illegal housing practices. The key provision here is section 45, which deals with participation in the activities of an organised crime group: it is an offence for someone to participate in the activities of an [OCG](#) if they know or reasonably suspect their involvement will help the group commit serious crime.

This provision ensures that anyone and any organisation that enables or facilitates organised crime can be held accountable, even if they are not the primary offenders. Such people may include landlords, managing/letting agents and property companies; such organised crime may include criminal exploitation, money laundering and fraudulent letting schemes. Conviction under this section can result in up to five years in prison, a fine or both. Additionally, authorities can use [POCA](#) powers to seize profits made from illegal housing schemes – see report section on the exercise of powers under the [Proceeds of Crime Act](#).

Examples of how landlords can be implicated

OCGs frequently exploit the [PRS](#) for financial gain, using properties for a range of criminal activities. Below are listed some of the main activities and how landlords, agents and property companies can be implicated in these criminal activities:

- Money laundering and fraudulent lettings:
 - using rental properties to clean illegal money, often by inflating rents or creating fake tenancy agreements
 - agents or landlords who turn a blind eye to cash payments, false documents or suspicious transactions could be liable under section 45
- Modern slavery, human trafficking and exploitation:
 - properties used to house trafficked individuals for labour or sexual exploitation
 - if landlords or agents knowingly rent properties to traffickers or fail to act on clear warning signs, they could be complicit in serious crime
- Drug production and county lines:
 - rental properties used for cannabis farms or drug processing
 - OCGs may rent multiple properties under different names to store and distribute drugs, often for county lines operations
 - a landlord or letting agent who suspects criminal activity but fails to report it could be prosecuted
- Illegal subletting and overcrowding for profit:
 - criminal networks taking control of properties, illegally subletting rooms to vulnerable tenants and making excessive profits while ignoring safety regulations
 - agents or landlords who facilitate such arrangements knowingly risk prosecution under organised crime laws.

Case studies of multi-agency approaches to tackling serious and organised crime in PRS properties

Case study: multi-agency operation uncovers human trafficking network

This criminal activity first came to the attention of housing enforcement officers at Barking and Dagenham Council when a neighbour in Ilford Lane, Barking, reported concerns about a suspected unlicensed [HMO](#). The complainant recounted high turnover of tenants, loud disturbances at night and padlocked bedroom doors visible through the windows. Acting under HMO licensing laws, council officers conducted a routine inspection and discovered 18 people living in a three-bedroom house, most of them Eastern European nationals. The conditions raised serious concerns – minimal personal belongings indicated transient occupancy and the padlocked bedroom doors restricted movement within the house. Additionally, there were no formal tenancy agreements – the landlord falsely claimed the occupants were just ‘lodgers’. The people inside appeared fearful and reluctant to speak. Many lacked identification documents, suggesting they were being coerced or controlled. Recognising potential exploitation, housing officers escalated the case to the Metropolitan Police’s Modern Slavery and Human Trafficking Unit.

Following an intelligence-led investigation and surveillance, police uncovered a larger organised crime network operating across multiple locations in London, Kent and Essex. A second linked property in Gravesend, Kent, was identified under similar circumstances – 12 more victims were discovered here. A third property in Southend-on-Sea, Essex, was being used as a safe house for newly trafficked individuals before they were forced into exploitative labour. The victims were being compelled to work in car washes, construction sites and illegal cleaning services. Their wages were confiscated by traffickers. Many were subjected to threats and violence if they attempted to leave.

In a coordinated operation involving the Metropolitan Police, Kent Police, Essex Police, and Immigration Enforcement, authorities arrested three traffickers in Barking, including two Romanian nationals and one British citizen linked to an Eastern European [OCG](#). Two additional arrests were made in Gravesend and Southend, targeting individuals responsible for the financial side of the operation, which included fraudulent rental agreements and housing benefit fraud. The traffickers were prosecuted under the Modern Slavery Act 2015, receiving sentences ranging from 8-12 years in prison. Housing enforcement officers also issued prohibition orders and revoked property licences, ensuring that the properties could not be used for the commission of further crime. Financial assets linked to the network were frozen under [POCA](#) to prevent further illicit gains.

Authorities prioritised victim support, working alongside anti-slavery charities such as Unseen UK and the Salvation Army to provide emergency housing and assistance to all 30 victims. Immigration teams assessed each individual for legal protection options and several were granted temporary leave to remain under modern slavery protections. The case prompted local councils to enhance intelligence sharing efforts across jurisdictions, improving their ability to detect and prevent similar trafficking operations in the future.

Case study: disruption of a cross-border drug operation in PRS properties

A large-scale criminal operation involving drug production, money laundering and illegal subletting was uncovered across the West Midlands and Greater Manchester. The crime network came to light after a housing enforcement investigation into an unlicensed HMO revealed major property modifications. Housing officers discovered that several of the properties had boarded-up windows, industrial fans and illegal electricity bypasses – clear indicators of cannabis farms being operated within.

During a joint visit by housing officers and the police, authorities linked three properties located in different council areas to the same criminal network. This collaboration between local housing enforcement, the police [ROCU](#), Trading Standards and [HMRC](#) was pivotal in exposing the full scope of the operation and launching a coordinated response.

The investigation led to a series of multi-agency actions. Police and the ROCU executed raids on the properties, successfully shutting down the illegal drug production sites. Meanwhile, HMRC traced rental payments that were being funnelled through a network of fake businesses set up to launder money from the drug operations. Local authorities took immediate steps to address the breach of housing laws by revoking property licences and issuing fines. Additionally, they pursued civil penalties against the landlords complicit in the illegal activities.

The outcome of the investigation was significant: five arrests were made and multiple properties and assets were seized under POCA.

Case study: nationwide housing benefit fraud ring exposed

The case came to light when Newham Council's housing fraud team flagged a pattern in housing benefit claims that appeared suspicious. Several claims were submitted from the same properties under different names within short timeframes, raising concerns about potential fraud. Rent payments for these properties were being funnelled into the same bank accounts, despite claims being made under different landlords' names. Routine verification checks revealed that many claimants could not be located at the registered addresses, leading to further investigation.

The [DWP](#)'s fraud investigation service collaborated with local authorities and uncovered a widespread fraud operation. The investigation revealed that over 100 properties across London, Birmingham and Glasgow were linked to the same criminal network. Fake landlords were submitting housing benefit claims using stolen or fabricated identities, and 'ghost tenants' were listed on official documents, despite never existing. Additionally, fraudulent landlords were laundering money through sham property management companies, further complicating the fraud. In all, millions of pounds' worth of fraudulent housing benefit claims made over a five-year period were exposed.

As the investigation unfolded, Birmingham City Council identified another 40 properties involved in the fraud, all falsely claiming housing benefits. In Glasgow, authorities uncovered 15 commercial properties being used as hubs for money laundering. DWP investigators took immediate action, freezing multiple fraudulent housing benefit claims, preventing any further payments from being made to the fraudulent landlords.

Police ROCUs across London, the West Midlands and Scotland assisted in tracking the financial flow of fraudulent rent payments, which led to the discovery of funds being funnelled into offshore accounts. HMRC also became involved, investigating the undeclared rental income and possible tax evasion. The [NCA](#) launched a wider investigation, linking the fraudulent operation to international money laundering networks, which significantly expanded the scope of the case.

In a series of coordinated raids across London, Birmingham and Glasgow, a total of eight individuals were arrested for their involvement in the fraudulent scheme. Following their arrests, four individuals were convicted and sentenced to 10+ years in prison for their roles in fraud, money laundering and conspiracy to defraud public funds.

Under [POCA](#), £3.4m was seized from the bank accounts linked to the operation, crippling the financial infrastructure of the fraud network. Sixty fraudulent housing benefit claims were terminated, preventing an estimated £1m in additional fraudulent payments. These actions not only disrupted the criminal network but also resulted in significant financial recoveries for the public purse.

Case study: letting agent convicted for renting properties to drug gangs

In 2021, a large-scale cannabis production network was uncovered after firefighters responded to a blaze at a rented house in East London. The fire, which was caused by an illegal electricity bypass, led authorities to a cannabis farm operating inside the property. On further investigation, law enforcement linked the property to a letting agent who was managing multiple rentals for the same criminal group.

Authorities found that the letting agent had rented out six different properties to the same group of tenants. Each of these properties was later found to contain cannabis farms, suggesting a well-organised and large-scale illegal operation. The agent had also accepted large cash deposits without issuing formal rental agreements, making it easier for the criminal group to operate without leaving a paper trail.

Neighbours had previously reported suspicious activity around these properties. Complaints included covered windows, unusual chemical smells and visitors arriving late at night. Despite these red flags, the letting agent ignored concerns raised by both neighbours and property owners. He also failed to conduct routine inspections, allowing the illegal operations to continue undetected for an extended period.

His failure to address clear signs of illegal activity and his willingness to accept cash payments without proper documentation suggested a possible level of complicity. He was charged under section 45 for knowingly facilitating organised crime. Under POCA, authorities confiscated £250,000 in illicit earnings he had made from renting properties to the [OCG](#). He was sentenced to four years in prison and permanently barred from working in the property sector.

D6: Financial recovery through the Proceeds of Crime Act 2002

Introduction

One of the most powerful tools available to local authority PRS housing enforcement teams is the Proceeds of Crime Act 2002 (POCA). Proceeds of crime are any money or assets gained through illegal activities, like drug trafficking, fraud or theft. Laws targeting proceeds of crime allow authorities to seize, freeze or confiscate these illegally obtained assets. The goal is to prevent criminals from benefiting financially from their crimes and to deter future offences.

This section of the toolkit provides an overview of how teams can leverage POCA to recover funds and reinvest them into further enforcement efforts.

Suspicious activity reports (SARs) and the Proceeds of Crime Act for housing enforcement

Under POCA, housing enforcement teams can use SARs to identify and investigate landlords or property owners suspected of profiting from criminal activity, such as illegal subletting, housing fraud and renting out unsafe properties. Submitted to the National Crime Agency (NCA), SARs flag potential money laundering or illicit gains, enabling authorities to take enforcement action, including confiscation orders and civil recovery proceedings. Housing officers and local authorities play a key role in reporting suspicious financial activities, helping to disrupt criminal enterprises and improve housing standards.

While SARs are a tool under POCA, they serve as a preventative measure rather than an enforcement mechanism. They alert authorities to suspicious transactions, which may then lead to criminal prosecution or civil recovery under the enforcement powers that POCA establishes.

Understanding POCA

In the UK, assets or money can go through POCA if they meet certain criteria:

- 1 **Criminal conduct link:** the asset must have been obtained through criminal activity – this can include theft, fraud, drug trafficking, money laundering, bribery or tax evasion
- 2 **Criminal property:** the asset must be considered ‘criminal property’, meaning it represents a benefit from crime and the person knows or suspects its illegal origin. This includes cash, real estate, vehicles, bank accounts and luxury items
- 3 **Value discrepancy:** if someone's lifestyle or assets do not match their declared income, it could trigger a POCA investigation
- 4 **Confiscation orders:** after a conviction, courts can issue a confiscation order to recover the value of the criminal benefit, regardless of whether the specific asset gained from crime is still held
- 5 **Civil recovery:** even without a criminal conviction, assets can be seized through civil proceedings if they are proven to be obtained illegally, based on the balance of probabilities.

In short, any property linked to crime, directly or indirectly, can potentially be subject to action under [POCA](#).

Criminal versus civil proceedings

POCA in the UK covers both criminal and civil proceedings, depending on the specific circumstances. It is mainly used in criminal cases but also allows for civil action when a conviction is not possible, especially in cases like suspected money laundering or unexplained wealth. For local authority housing enforcement teams targeting criminal landlords, using POCA through criminal proceedings is often the most effective approach.

Criminal proceedings:

- Used after a criminal conviction
- The court can issue a confiscation order to recover the value of assets obtained through crime
- This process requires proof beyond reasonable doubt (the criminal standard of proof).

Civil proceedings:

- Used without a criminal conviction if there is enough evidence that assets were gained through unlawful conduct
- Authorities can apply for civil recovery in the High Court
- This uses a balance of probabilities standard (the civil standard of proof), which is easier to meet than the criminal standard.

Why criminal proceedings are best:

- 1 **Stronger deterrent:** a conviction followed by a confiscation order sends a powerful message to other landlords that illegal practices will not be tolerated
- 2 **Higher penalties:** courts can impose heavier fines and prison sentences for serious offences, like illegal evictions, poor living conditions and housing fraud
- 3 **Asset recovery:** POCA allows authorities to seize profits gained from renting out substandard or unsafe properties, cutting off financial incentives for criminal behaviour
- 4 **Rent repayment orders:** alongside POCA, enforcement teams can also apply for RROs, forcing landlords to repay rent collected illegally.

When civil proceedings might help:

- 1 **No conviction needed:** if there is not enough evidence for a criminal conviction, but illegal profits are suspected, a civil recovery case can still recover assets
- 2 **Faster process:** civil cases may be quicker and require a lower standard of proof (balance of probabilities).

Best practice for enforcement teams:

- Use criminal proceedings with POCA as the first line of action for serious offences
- Combine with RROs and banning orders under the Housing and Planning Act 2016

- Use civil recovery as a backup if securing a conviction is not possible but unlawful financial gain can be demonstrated.

Key steps in using POCA for PRS enforcement

Step 1: identify eligible cases

Enforcement teams should assess cases where financial gain has resulted from a criminal offence. Offences under the Housing Act 2004, Fraud Act 2006 and other relevant legislation may qualify for POCA applications. The first stage in pursuing a POCA application involves identifying cases that meet the eligibility criteria. Enforcement teams should carry out a comprehensive assessment of cases where there is evidence that a financial benefit or gain has been obtained as a result of criminal activity. The objective is to ensure that offenders do not profit from their illegal actions and that any unlawfully acquired assets are recovered.

Enforcement teams should assess cases where there is clear evidence of financial gain from criminal activity, including offences committed by [OCGs](#). Eligible cases typically involve breaches under the Housing Act 2004 (such as unlicensed rentals or safety violations), fraud under the Fraud Act 2006 or offences linked to larger criminal enterprises, including money laundering, drug trafficking and illegal financial operations. Because of their scale and complexity, organised crime cases should be prioritised for POCA applications – with collaboration from specialised agencies like the [NCA](#) where necessary. Legal teams should be consulted early to confirm eligibility, ensure the appropriate gathering of evidence and maximise the potential for recovering unlawfully obtained assets.

Step 2: conduct financial investigations

Accredited financial investigators (AFIs) can be engaged to trace unlawful earnings and assets. They are specialist-trained and authorised under [POCA](#) to investigate, trace and recover assets obtained through criminal activities. They have the legal authority to follow financial trails, uncover hidden assets and seize property, cash and bank accounts linked to unlawful conduct. They play a crucial role in supporting enforcement agencies – including local authorities, police forces and national bodies like the NCA – by conducting financial investigations and gathering evidence for confiscation proceedings. AFIs can also use powers such as unexplained wealth orders (UWOs) to investigate assets that appear disproportionate to an individual's known income.

Step 3: obtain restraint orders

A restraint order under POCA is a legal order issued by a court or the NCA to freeze a person's assets. Its main purpose is to prevent the dissipation of assets that might later be confiscated if the individual is convicted of a crime and found to have benefited financially from their criminal conduct. It prevents the defendant from selling, transferring or dealing with their assets (e.g. bank accounts and property) without court permission. It can be issued at any stage of a criminal investigation – even before formal charges are brought – if there is reasonable suspicion that a financial crime has occurred. It can apply to assets held both in the UK and abroad. Violating a restraint order is a criminal offence in itself and can lead to further penalties, including imprisonment.

Step 4: confiscation proceedings

Following a conviction, enforcement teams can apply for orders under POCA to recover illegal earnings. A confiscation order is a court order that requires a convicted offender to pay back the financial benefits they gained from criminal conduct. It is typically issued after a conviction in a criminal trial. The aim is to strip offenders of the profits made through illegal activities. The court assesses the total value of the offender's criminal benefit, not just the assets currently available. If the offender does not have enough assets to cover the full amount, any available property – for example, houses, cars and bank funds – can also be seized. Payment must usually be made within a specific period (often three months) or the offender could face additional imprisonment for non-payment. The scope of the process can extend to assets held abroad, if identified and enforceable under international agreements.

Step 5: civil recovery

If a criminal prosecution is not feasible, Part 5 of POCA provides an alternative legal route through civil recovery proceedings. This allows enforcement teams, including local authority housing enforcement officers, to reclaim assets believed to have been obtained through unlawful conduct – without the need for a criminal conviction. Civil recovery is particularly effective in tackling cases involving organised crime linked to property, such as money laundering, drug production and illegal subletting by criminal networks.

Unlike criminal proceedings, civil recovery operates under the civil standard of proof – the balance of probabilities – meaning it only needs to be shown that it is more likely than not that the assets are connected to unlawful activities. This lower burden of proof makes civil recovery a valuable tool where there is insufficient evidence for a full criminal conviction or where suspects are beyond the reach of prosecution, for example when they have fled the jurisdiction.

For housing enforcement teams, civil recovery is particularly relevant in cases where organised crime infiltrates the [PRS](#). Examples include:

- **Properties used for criminal enterprises**, such as drug cultivation (e.g. cannabis farms), human trafficking and illegal gambling operations.
- **Rental income from unlicensed or substandard properties** controlled by [OCGs](#)
- **Housing fraud** facilitated by criminal networks, including benefit fraud, illegal subletting and identity theft related to tenancy agreements
- **Money laundering operations** where properties are purchased using the proceeds of crime to legitimise illicit funds.

Local authorities can collaborate with agencies such as the [NCA](#), [CPS](#) and police financial investigation units to initiate civil recovery proceedings. If the court agrees that the assets are likely proceeds of crime, a civil recovery order can be granted, allowing for the seizure or forfeiture of the property or associated assets.

This process ensures that offenders, particularly those involved in organised crime, are prevented from profiting from illegal activities. Recovered funds can also be reinvested into local enforcement efforts, allowing housing teams to strengthen their

capacity to disrupt organised criminal networks and maintain safer, law-abiding communities.

Step 6: reinvesting recovered funds

Under the Asset Recovery Incentivisation Scheme (ARIS), local authorities are allowed to retain a portion of the assets recovered through proceedings under POCA. This scheme serves as a powerful incentive for enforcement teams, enabling them to reinvest seized funds into further enforcement activities, thereby enhancing their capacity to tackle criminal landlords and broader unlawful activity within the housing sector.

For housing enforcement teams, funds recovered through ARIS can be used to:

- Expand investigations into criminal landlords operating unlicensed or substandard properties
- Fund initiatives aimed at disrupting organised crime groups using properties for illicit activities such as drug production, illegal subletting and human trafficking
- Invest in technology, staff training and resources to improve enforcement operations and ensure compliance with housing laws
- Support partnerships with specialist agencies such as the NCA and local police financial investigation units to tackle more sophisticated financial crimes.

In cases involving organised crime, ARIS can be particularly useful in helping local authorities to direct resources toward dismantling criminal networks operating within the property sector. By reinvesting recovered funds into proactive enforcement measures, authorities can enhance their ability to identify, investigate and prosecute offenders while preventing future criminal activity from taking root in local housing markets.

Challenges for local authorities

Local authorities face a range of challenges when enforcing POCA, particularly in complex cases involving criminal landlords and organised crime. These challenges can hinder the effectiveness of investigations, limit asset recovery efforts and strain already limited resources. They include:

- Lack of awareness, expertise and training within local authority teams
- The complexity and resource intensity of financial investigations
- Coordination challenges between local authorities, police and other prosecutors
- Potential unintended consequences such as the impact on vulnerable tenants or displacement of criminal activity
- Financial disincentives when costs outweigh financial returns; or reduced incentives as a result of sharing out recovered proceeds among different agencies.

Further resources

- [Proceeds of Crime Act 2002](#) in full
- [Proceeds of Crime Act 2002 codes of practice](#)
- [National Crime Agency guidance](#)
- [Local Government Association: housing enforcement best practice](#)

Case studies involving POCA and landlords

Brent Council

In a landmark case, Brent Council became the first local authority in England to use POCA against a family of landlords who severely overcrowded a property. In May 2017, the Shah family was found guilty of cramming up to 40 tenants into a semi-detached house in Wembley. The property was officially licensed to accommodate no more than seven people. The tenants, many of whom were vulnerable, endured appalling conditions, including having to sleep on bunk beds that obstructed fire exits and, in some cases, having to live in makeshift shelters in the garden. The court described these arrangements as 'grossly overcrowded and unsafe'.

Financial investigations revealed that the Shah family had profited by around £360,000 from this illegal set-up. In response, Brent Council pursued confiscation proceedings under [POCA](#), aiming to recover the illicit earnings obtained through these criminal activities. This case set a precedent, demonstrating that local authorities could use POCA to hold criminal landlords to account by targeting the profits they had amassed from exploiting tenants.

Newham Council

Newham Council has been proactive in applying POCA to address housing violations. In one notable instance, a landlord faced multiple prosecutions resulting in significant confiscation orders. For example, one property led to a confiscation order of £22,218.50, with the council receiving £8,220.80 as its share. Another property resulted in a £62,149.34 order, with £22,995.20 allocated to the local authority.

Lincolnshire Trading Standards

On 18 January 2019, Lincolnshire Trading Standards prosecuted Leonardo Visconti, a 61-year-old landlord from Lincoln for knowingly allowing criminal activities on premises he rented out. Located at 93 High Street, Lincoln, the property operated as European Foods (also known as Krakowiak) and was involved in the sale of illicit tobacco and alcohol. Despite multiple warnings and detailed correspondence from Trading Standards about the illegal activities and the consequences of accepting rent under such conditions, Mr. Visconti failed to take action against his tenant. As a result, he was sentenced at Lincoln Crown Court to an eight-month suspended prison term and 150 hours of unpaid community work. Additionally, under POCA, a confiscation hearing was scheduled with a view to seizure of the rental income he had received over the previous six years. This case marked the first prosecution of its kind in the UK, setting a precedent for holding landlords to account when they are aware of illicit activities taking place on their properties.

Conclusion

POCA is a powerful tool for PRS enforcement teams, enabling the recovery of criminally obtained funds and reinforcing regulatory compliance. By leveraging financial investigation techniques, collaborating with law enforcement and reinvesting recovered assets, local authorities can enhance their ability to tackle criminal landlords and protect tenants.

D7: Publicising a criminal landlord initiative

Why it is important to publicise the work of the initiative

Publicising work undertaken with partners to tackle criminality in the [PRS](#) is essential for raising awareness, deterring offenders and building public confidence in enforcement efforts. It highlights the commitment of local authorities to get to grips with criminality in the PRS, encourages tenants to report issues and reinforces collaboration with key stakeholders like the police. Transparency about enforcement actions also serves as a warning to unscrupulous landlords while promoting best practices within the sector.

Developing a strategy

Each initiative or project has unique aims, involving different participants with their own distinct objectives, as well as stakeholders with varying goals and needs. As a result, there is no one-size-fits-all approach to publicising initiatives effectively. Each strategy should be carefully tailored to meet the specific objectives and requirements of the individual project. Some initiatives might have their own communication teams or even a press office.

This paper should be read in conjunction with the section on [building effective partnerships](#).

These questions need addressing before a strategy to publicise the initiative is drawn up:

- 1 Who are the key stakeholders who stand to benefit? Why and how do they benefit?
- 2 What are the key objectives of the initiative? How are they going to be measured?
- 3 What are the key benefits it delivers? How do they align with those of different stakeholders?
- 4 What are the limitations or drawbacks (if any) that need to be managed?

Communicating effectively

There are numerous ways to communicate effectively, each with its own unique value, potential and drawbacks. Understanding these methods and aligning them with the needs, behaviours and preferences of stakeholders is crucial for successful communication. Here is one possible approach for communicating a new initiative in the PRS:

1 Understand the audience

- **Tenants:** emphasise how this initiative targets criminality in the PRS and organised crime, protecting tenants from unsafe and illegal activities
- **Landlords:** highlight the consequences for landlords who are complicit or involved in criminal behaviour and organised crime
- **Wider community:** showcase how the initiative helps reduce crime, enhances neighbourhood safety and tackles organised crime networks operating in rental properties.

2 Develop clear messaging

- **Be clear on the core message:** develop one core message or aim of the initiative – for example, *Fighting criminality and organised crime in the PRS to protect communities and ensure secure and safer housing for all*. Branding can help promote initiatives
- **Marshal the key points:** be sure to set out:
 - the role of the criminal landlord unit (CLU) in tackling criminality and organised crime in the PRS
 - the support available for tenants to report criminal activities confidentially
 - the responsibility of landlords to cooperate in addressing criminality
 - the benefits for the community, such as reduced criminal activity and safer streets and neighbourhoods
 - the support given to landlords and how such an initiative will make it a safer and fairer rental market
- **Make the most of available statistics:** use evidence to make your point – share stories and data on criminality and organised crime linked to PRS properties, along with complaints from tenants and the community to highlight the need for intervention
- **Humanise the initiative:** for example, share details of who will benefit and how
- **Mind your language:** be aware of cultural diversity, cultural norms and language barriers that undermine inclusivity
- **Play to skills:** make the most of each partner's links, networks and expertise in communicating to different audiences.

3 Promote your initiative

- **Organise events:** for example, a promotional workshop to engage with key stakeholders and partners
- **Speak at events:** speak at landlord and community events to promote your work
- **Talk to potential partners:** offer to attend potential partners' meetings to outline your work and tell them how they can contribute.

4 Press and media engagement

- **Press release:** announce the initiative with a focus on tackling criminality and organised crime and its harmful impact on the community. Include quotes from council leaders or housing professionals – see [publicity templates](#)
- **Local media features:** arrange interviews with staff involved in tackling criminality, including partner organisations such as the police, and tenants or the public who have been affected by PRS-related crime
- **Media event:** host a launch event, inviting local journalists to learn more about how the [CLU](#) and other partners work to combat crime in PRS properties.

5 Digital outreach

- **Council website:** create a dedicated page for the [CLU](#), which should include an outline of what the unit does, instructions on how someone can report criminal activity and guidance on the part landlords can play in helping prevent crime. Run polls and list [red flags](#) to look out for

- **Social media:** make the most of social media, understand which stakeholders are most engaged and with which platforms and consider prioritising those channels in communications – see [publicity templates](#). Monitor – and be prepared to engage with – feedback on social media and elsewhere:
 - post educational content on how criminality and organised crime infiltrates rental properties – for example, *How to spot illegal activity in your neighbourhood*
 - share success stories about criminal activities dismantled through enforcement actions
 - use infographics, short videos, real-life photographs and a hashtag like #StopCrimeInPRS or #SafeHomesNoCrime
- **Email campaigns:** send announcements to landlords and tenants about the team's role in fighting criminal activity, along with tips for identifying and reporting crime – see [publicity templates](#).

6 Engage the community

- **Public information events:** hold workshops or Q&A sessions focusing on criminality in the PRS and how the public can help to combat it
- **Landlord forums:** invite responsible landlords to discuss their role in preventing criminality and to learn about their responsibilities in the initiative
- **Tenant support services:** collaborate with advocacy groups to provide confidential advice to tenants on dealing with criminal activity.

7 Print and outdoor media

- **Flyers and posters:** distribute materials in public spaces like libraries, community centres and GP surgeries, highlighting the dangers of criminal activity in rental properties and how to report it
- **Bill inserts:** include in council tax or housing benefit mailings information about the CLU and its work fighting organised crime
- **Outdoor advertisements:** place posters in areas with high concentrations of rental properties, focusing on crime prevention and how to get involved.

8 Collaboration with stakeholders

- **Landlord associations:** partner to promote awareness of the role landlords can play in combating organised crime and the consequences of not engaging
- **Police and emergency services:** collaborate with law enforcement to address organised crime in rental properties and support joint operations
- **Community leaders:** engage local leaders to help spread the message of the initiative and its role in reducing crime and enhancing safety
- **Tenant advocacy groups:** work with tenant organisations to raise awareness about criminal activity in rental properties and the resources available to report it.

9 Incentives for reporting

- **Make reporting easy:** promote an anonymous reporting hotline or web form where tenants, neighbours or other members of the community can report criminal activities – and include strong assurances about confidentiality and protection for whistleblowers

- **Reward schemes:** consider providing small financial rewards, vouchers or other incentives for verified reports that lead to successful enforcement action
- **Community recognition programmes:** recognise individuals or community groups who contribute to creating safer neighbourhoods through reporting.

10 Monitor and share impact

- **Regular updates:** work with your communications and legal departments to share information on criminal activities uncovered, arrests, prosecutions and other actions taken to dismantle criminal organisations in rental properties
- **Success stories:** highlight cases where criminal enterprises were dismantled and tenants moved to safer accommodations and where landlords took action to prevent crime
- **Annual report:** publish a report showcasing the impact of the initiative, including successes in reducing criminality, continuing challenges and next steps
- **Prepare for setbacks:** be realistic and have backup plans.

D8: Example templates and content for publicising a criminal landlord initiative

Example press release template

[Local authority name] launches criminal landlord unit to tackle criminality in private rented sector properties

[City/town name], [date] – [local authority name] has launched a new **criminal landlord unit** to crack down on criminal activities, including organised crime in their private rented sector (PRS) properties.

This dedicated team will investigate and address cases where PRS properties are linked to criminality and organised crime, including drug production, human trafficking, modern slavery, sexual exploitation, cuckooing and fraud. The initiative also targets landlords who facilitate these activities by turning a blind eye or actively participating, ensuring that those responsible face enforcement action.

‘PRS properties should be homes, not hubs for criminal activity,’ said [spokesperson’s name], [title]. ‘The criminal landlord unit will work with law enforcement and other community partners to disrupt criminal networks, safeguard tenants and protect neighbourhoods from exploitation.’

Residents are encouraged to report suspicions of criminal activity in PRS properties – such as anti-social behaviour, overcrowding, harassment and unusual behaviour. They can do this confidentially via [hotline number] or [website/email]. The criminal landlord unit will conduct investigations and collaborate with police and other agencies to take action.

This initiative underscores [local authority name]’s commitment to maintaining safe, lawful communities by addressing criminal landlords and the criminal exploitation of housing.

ENDS

For media inquiries, contact:

[name, title]
[phone number]
[email address]

Social media content template

Example launch post (Facebook/Instagram/Twitter etc)

🌟 We're taking action against criminality in private rented sector properties!

The new **criminal landlord unit** is cracking down on illegal activities in rental housing, including:

- human trafficking 
- drug production 
- cuckooing 
- fraud 

💡 Notice something suspicious in your area? Report it confidentially:

📞 [hotline number]

💻 [website link]

Together, we're tackling crime and criminal landlords.

#SafeCommunitiesForAll

Example educational post: signs of criminal activity

🏠 Is a private rented sector property hiding criminal activity?

🔍 Look for these warning signs:

- anti-social behaviour 
- frequent visitors at odd hours 
- blocked windows or unusual smells 
- overcrowded conditions 
- intimidation or harassment by landlords 

If you suspect criminal activity in a private rental property, report it:

📞 [hotline number]

💻 [website link]

#StopCrimeInPRS

Example success story post

🎉 Another criminal landlord caught!

Our criminal landlord unit, working with law enforcement and other partners, has shut down a PRS property used for [specific criminal activity, e.g. cannabis cultivation].

💡 Suspect something similar in your area? Contact us anonymously:

📞 [hotline number]

💻 [website link]

We're protecting neighbourhoods and tackling crime.

Engagement campaign ideas

Awareness campaign: criminal landlord activity

- **Infographic:** 'what does a cannabis farm look like?'
Visual examples: photographs from properties showing plants, damage to property, covered windows, tampered electrical installations etc.
- **Video series:**
 - **'A day in the life of the criminal landlord unit'**: show how the team collaborates with police and others to investigate criminality in properties
 - **'Know the signs'**: short clips explaining how tenants and neighbours can identify and report suspicious activity.

Social media polls/quizzes

- **Poll idea:**
 - Question: 'Do you know what organised crime in the private rented sector looks like?' (yes/no)
 - Follow-up: post an educational infographic or video.
- **Quiz idea:**
 - **'Spot the red flags!'** Create a multiple-choice quiz highlighting suspicious behaviours (e.g. odd hours, intimidation) to raise awareness.

Visual suggestions for posts

Launch post – visual idea:

- A darkened house silhouette with warning symbols (e.g. money bags, police lights)
- Text overlay: 'Fighting crime in PRS properties: report suspicious activity.'

Warning signs post – visual idea:

- Carousel featuring individual warning signs (e.g. blocked windows, overcrowding, harassment) with short explanations on each slide.

Success story post – visual idea:

- A photo of police or council officers outside a recently inspected property (if possible), with a bold caption like **'Criminal operation shut down!'**

E: Intelligence and data sharing

E1: Databases for recording and sharing data

Introduction

Access to certain databases may depend on whether or not a local authority is subscribed to the service or on the level of collaboration between agencies and the willingness to share data. It is essential to remember that [data protection laws](#) must always be respected when accessing or sharing data. Schedule 2, Part 1, paragraph 2 of the Data Protection Act (DPA) 2018 establishes the key exemptions that can be cited for the investigation of crime. This provides for the disclosure of personal data for the purpose of 'prevention or detection of crime, the apprehension or prosecution of offenders'. Essentially, it enables organisations to share relevant data with law enforcement agencies without breaching data protection regulations when investigating a crime. This is often referred to as the 'crime and taxation exemption'.

Data sharing protocols – especially in the context of multi-agency working or partnerships – are often necessary to ensure that sensitive information is shared securely and legally – see example templates for a [memorandum of understanding](#) and an [information sharing agreement](#). Not all local authorities will be able to access the same data in their areas, as this will depend on specific databases held and software adopted. Local authorities will therefore need to develop their own reference list of partnership databases that can assist their work in tackling PRS-related crime.

The new Renters' Rights Bill contains provisions to help reduce criminality and improve protections for tenants in the PRS by targeting criminal landlords. One of the key features is the introduction of a new landlord portal, which will allow authorities to better track and identify landlords who have been convicted of illegal practices, such as harassment, illegal evictions and serious breaches of tenant rights. This portal builds on the existing rogue landlord database, but with key differences. While the current system focuses primarily on landlords who have been sanctioned by local authorities or found guilty of offences, the new database will likely offer a broader, more proactive tool for monitoring and vetting landlords across the PRS. It aims to prevent landlords with a history of criminality from re-entering the market by creating a more comprehensive record that includes both enforcement actions and continuing risks, thereby enhancing transparency and tenant protection.

Mandatory database

National Rogue Landlord Database

The National Rogue Landlord and Agent Database (RLAD) was introduced under the Housing and Planning Act 2016 as part of government measures to crack down on unscrupulous landlords and property agents in England. This database allows local authorities to record information about landlords and property agents who have been convicted of specific housing-related offences or received certain penalties.

Under the Act, local authorities have:

- a mandatory duty to add to the database individuals or companies convicted of a banning order offence (as set out in the Banning Order Offences Regulations 2018)
- discretion to make an entry if the offender has received two or more financial penalties for housing-related offences within a 12-month period.

Before it can make a discretionary entry, a local authority must give the landlord or agent at least 21 days' notice, advising them that it has decided to add them to the database. The notice must be provided within six months of the conviction or of receipt of the second civil penalty.

Government guidance notes that the more comprehensive the database is, the more useful it will be. It also stipulates that, in deciding whether or not to use this discretionary power of entry, local authorities should consider:

- The severity of the offence
- Any mitigating factors
- Culpability and serial offending
- Deterrence of the offender from repeating the offence
- Deterrence of others from committing similar offences.

Entries on the database typically include:

- The offender's details – full name, address and any aliases of the landlord or agent
- Details of the offence(s) for which the individual or company has been convicted or penalised
- The date the offence(s) occurred
- Details of the penalties imposed, including court orders, fines and any banning orders
- Any additional relevant information such as any history of non-compliance with housing regulations.

After two years, local authorities have the discretion to review and remove entries if appropriate. But they can also choose to keep records for longer if they deem it necessary. If the offender is subject to a banning order, their details must remain on the database for its entire duration. Banning orders have effect for a minimum of 12 months, but may be extended depending on the severity of the case.

Not publicly available, the content of the database is accessible only to:

- Local authorities – to support enforcement actions against criminal landlords/agents
- The Secretary of State for Housing, Communities and Local Government – to oversee its management and effectiveness.

For further information, see the [database of rogue landlords and property agents](#) under the Housing and Planning Act 2016.

Optional databases to use

Trading Standards Information Intelligence Database (IDB)

The Trading Standards Information and Intelligence Database (IDB) is a secure platform used by some local authorities and enforcement agencies to share, analyse and manage intelligence about criminal activities, particularly ones that affect consumers and businesses. In 2023/24, the IDB had over 41,000 general intelligence entries, including data on serious and organised crime,³¹

The database contains records of complaints made by tenants, consumers and other parties, alongside details of any investigations carried out by enforcement authorities. It includes names, aliases, contact details and business addresses. The IDB provides a valuable and indispensable resource for PRS enforcement teams in identifying criminal and rogue landlords or managing/letting agents. By accessing the data, teams can quickly determine whether a landlord has a history of violating housing regulations or has had any involvement in crime. Because the IDB is shared among local authorities and agencies across England, it helps enforcement teams track landlords or agents who operate in more than one area.

The IDB also records the outcomes of investigations, including evidence collected, penalties issued and prosecutions pursued. This is useful for PRS teams in building strong legal cases against landlords who repeatedly breach housing laws. It also reduces duplication of work, as PRS officers can rely on evidence already gathered by other agencies. The IDB includes intelligence relevant to consumer protection law, which often intersects with PRS enforcement – for instance, in misleading property advertisements, unfair tenancy agreements and failure to return deposits.

The data recorded in the IDB provides PRS teams who subscribe to this database with a powerful tool to:

- Identify and prioritise enforcement actions against high-risk landlords and agents
- Build stronger cases by accessing historical and cross-regional intelligence
- Work collaboratively with other local authorities and agencies to tackle rogue and criminal operators more efficiently
- Ensure consistent enforcement across jurisdictions, creating a safer and fairer rental market for tenants.

Police databases

UK police forces use multiple databases to record intelligence, criminal records and other law enforcement data, some of which may be important to local authority housing PRS enforcement teams. Key systems include:

- PNC (Police National Computer) – used for criminal records, wanted persons, stolen vehicles and missing persons. It is accessible by all UK police forces
- PND (Police National Database) – designed for intelligence sharing across all UK police forces, allowing officers to search and access data from different regions
- HOLMES (Home Office Large Major Enquiry System) – used for managing major investigations such as murder cases and terrorism-related incidents

³¹ National Trading Standards (NTS), [National strategic assessment: summary briefing document](#), October 2024

- VISOR (Violent and Sex Offender Register) – shared between police, probation and prison services to track violent and sex offenders.
- NICHE or CONNECT – some forces use their own intelligence and case management systems (e.g. NICHE RMS and CONNECT) to manage local investigations, case files and intelligence
- [ANPR](#) – a networked system for tracking vehicle movements nationwide.

The PNC and PND are the only databases linked nationally. The rest are either standalone systems or linked to other local agencies.

Local authorities do not have direct access to key police databases like PNC or PND, as these are restricted to law enforcement agencies. However, they can request information from police forces under certain circumstances – such as whether a landlord they are investigating has a criminal record.

In some cases, police forces may allow certain local authority officers (for example, from housing enforcement) to access information sharing systems for specific purposes, such as crime prevention, safeguarding and joint investigations. This access is typically controlled and highly regulated to ensure data protection and confidentiality. The extent to which access is granted may depend on specific local priorities, available resources and the strength of multi-agency collaboration within a specific region.

Local Authority Council Tax Association system (LoCTA)

[LoCTA](#) is a database and software solution designed to help local authorities manage council tax records, debt recovery and information sharing across council boundaries. Local authorities can interrogate the system and use the information available to investigate and take action. Relevant data here include names, aliases, addresses, occupancy, council tax payment, property ownership information, alternative contact details/addresses of landlords, Companies House data, details of rented properties, [HMO](#) details, entitlement to benefits and fraudulent benefit claims.

For PRS enforcement teams, LoCTA is particularly useful because it can:

- Locate criminal landlords: if a landlord owes council tax or is difficult to track, LoCTA can help identify their current location or financial history across multiple regions
- Verify property ownership: LoCTA can assist in confirming who owns a property
- Cross-reference housing offences: PRS teams can use LoCTA to ensure housing offenders are identified consistently across local authorities, helping with enforcement actions like civil penalties or banning orders.

Land Registry

The [Land Registry](#) – formally, HM Land Registry – is a UK government agency that records the ownership of land and property in England and Wales. It provides a comprehensive, authoritative database of property ownership, making it an essential tool for PRS enforcement teams. It is useful because it:

- Records property ownership, including individual names, corporate entities and addresses, and provides information on leasehold and freehold ownership

- Tracks ownership changes through sale, inheritance and transfer
- Provides property title documents with important details such as: current owner(s), type of ownership (freehold or leasehold), restrictive covenants and easements, boundaries of the property and charges on the property
- Offers public access to property records.

Companies House

Companies House records provide valuable data for local authority housing enforcement teams, including details of company directors, registered addresses, shareholders and filing histories. This information helps identify the individuals or entities behind property ownership, particularly the ones who attempt to conceal this through other means. Financial records, such as annual accounts and confirmation statements, can indicate a company's financial stability and whether it is actively trading. Company status (active, dissolved or struck off) helps authorities detect fraudulent or non-compliant landlords, while records of past directorships can reveal links to previously failed or non-compliant housing businesses. Containing details of individuals with significant influence, the Persons with Significant Control (PSC) register helps in tracing people responsible for multiple problem properties. It also holds financial information and details of loan charges, including for mortgages.

For further information, see the Companies House website – [Get information about a company](#).

Credit reference agencies

Credit reference agencies hold data that could help local authorities identify and tackle criminality in the PRS as they hold various types of data which would not normally be available to councils. This could include for example, access to tenant credit histories and financial patterns. By cross-referencing data, local authorities could detect criminal activities or gain more complete intelligence for their investigations. The major credit reference agencies in the UK are Experian, Equifax and TransUnion. Others include Crediva, ClearScore and Credit Karma UK.

NAFN Data and Intelligence Services (National Anti Fraud Network)

NAFN is a UK-wide organisation that supports local authorities, government agencies, and other public sector bodies in tackling fraud, crime and regulatory breaches. It provides access to intelligence, data sharing services and investigative tools to help enforcement teams detect and prevent fraudulent activities. Membership is open to any organisation that has responsibility for managing public funds and/or assets.

While NAFN does not hold its own database, it acts as a gateway to multiple data sources. The types of information NAFN provides access to include company and business information; individual and identity verification; financial and banking information; property and tenancy information; criminal and fraudulent activity; and vehicle and transport data. Key services that member organisations may be able to access include:

- Investigatory Powers Act 2016, acquisition of communications data service (used only for the prevention and detection of crime)
- Authorised officer services including Prevention of Social Housing Fraud Act 2013 and Council Tax Reduction Scheme Regulations 2013

- Access to overnight service for [DVLA](#) current vehicle keeper details
- National [ANPR](#) (Trading Standards only)
- Direct access to TransUnion and Equifax, providing instant retrieval of credit reports and bank account verification and validation; access to Experian Reports
- Sanction Information Database (SiD), national database holding all trading standards prosecutions, cautions and penalties
- National Register of Taxi and Private Hire Vehicle Revocations, Refusals and Suspensions (NR3S)
- Intelligence Database.

For further information see the [NAFN website](#).

Mayor of London and the London Assembly rogue landlord and agent checker

This is a publicly accessible database designed to help tenants and councils identify rogue landlords and managing/letting agents who have been fined or prosecuted for housing-related offences in London. It is part of the Mayor's commitment to improving standards in the private rental sector and ensuring tenants have access to safe and secure housing. Key features include:

- **Council enforcement actions** – the checker includes records from local councils across London that have taken enforcement action against landlords or agents. These cover breaches of the Housing Act 2004, including cases where landlords have ignored improvement notices or operated unsafe housing
- **Public database of offenders** – tenants can search for agents and landlords who have received civil penalties, criminal convictions or banning orders for housing-related offences, including failing to meet housing standards, operating unlicensed rental properties, harassment and illegally evicting tenants
- **Tenants' reporting tool** – renters can submit reports of landlords or agents they suspect of breaking the law – these are sent to the relevant local council for investigation
- **London-wide collaboration** – the database brings together enforcement data from multiple London boroughs, allowing councils to track repeat offenders who operate across different boroughs
- **Banning order register integration** – the checker includes landlords and agents who have been banned under the Housing and Planning Act 2016.

The Greater London Authority (GLA) oversees and updates the database in collaboration with councils. Unlike the UK Government's rogue landlord database, which is not publicly accessible, the London rogue landlord and agent checker is openly available for tenants to search, making it a key tool in holding bad landlords accountable and improving rental conditions in London. For further information see: [the GLA's rogue landlord checker](#).

Cifas – the Credit Industry Fraud Avoidance System

Cifas is a not-for profit fraud prevention organisation that maintains several fraud databases that can be valuable resources for local authority housing enforcement teams. Their primary database, the Cifas national fraud database, contains detailed records of individuals and organisations flagged for fraud, including identity fraud, tenancy fraud and financial misconduct. For housing enforcement, Cifas can help local

authorities identify landlords or managing/letting agents involved in fraudulent activities such as illegal subletting, false tenancy applications and housing benefit fraud. Additionally, Cifas' internal fraud database allows local authorities to cross-check internal fraud risks by identifying tenants or employees who may be committing fraudulent actions within the sector.

E2: Data sharing legislation

In England, there are legislative frameworks available to local authority housing enforcement teams and their partners – internal and external – that enable effective and lawful data and intelligence sharing to tackle criminality in the [PRS](#). These frameworks encompass both housing-specific legislation – such as the Housing Act 2004 and associated regulations – and more general statutory provisions, including the Crime and Disorder Act 1998 and the Data Protection Act 2018 (DPA). Set out below are the main legislative provisions. Anyone in any doubt about sharing information should consult their own legal department.

Schedule 2, Part 1, paragraph 2 of DPA details the key exemptions that apply to the investigation of crime. These exemptions allow for the disclosure of personal data for the purpose of ‘prevention or detection of crime, the apprehension or prosecution of offenders’. Often referred to as the ‘crime and taxation exemption’, this essentially enables organisations engaged in the investigation of crime to share relevant data with law enforcement agencies without breaching data protection regulations.

General legislation

Data Protection Act 2018 and UK GDPR

The DPA 2018 and the UK General Data Protection Regulation (GDPR) provide the foundation for data sharing, allowing public bodies to process personal data for law enforcement purposes under specific conditions. For tackling criminality, data can be shared when it is necessary for the purposes of preventing, detecting, investigating or prosecuting criminal offences, or for safeguarding against threats to public security. Data sharing must meet principles of lawfulness, necessity and proportionality, with appropriate safeguards to protect individuals' rights.

Part 3 of the Data Protection Act 2018 governs the processing of personal data by ‘competent authorities’ for law enforcement purposes, which include preventing, investigating, detecting or prosecuting criminal offences.¹

Section 35 allows data processing (which includes sharing) if it is necessary and proportionate for law enforcement purposes. This section is vital for public authorities, as it provides a lawful basis for processing data when addressing criminal matters.

Section 36 sets conditions for data sharing, emphasising that information shared must be adequate, relevant and limited to what is necessary. It also requires data controllers (organisations holding data) to put appropriate safeguards in place.

Crime and Disorder Act 1998 (CDA)

Section 115 specifically grants relevant authorities the power to share information that will support crime and disorder reduction. This includes local councils, the police, probation services and other criminal justice agencies. It states that any person can lawfully disclose information to a relevant authority (like a police force or local authority) if it is necessary to support a statutory crime and disorder purpose. This can cover data shared as part of a multi-agency approach to reduce community-based crimes, organised crime and anti-social behaviour within a given area. The CDA is often cited in multi-agency data sharing agreements focused on crime prevention and community safety.

Serious Crime Act 2007

The Serious Crime Act allows for data sharing to prevent serious organised crime, providing agencies with the authority to share information to disrupt criminal networks.

Section 68 allows public bodies to share information to help prevent and combat serious organised crime. It specifically provides that a public authority can disclose information to a ‘specified anti-fraud organisation’ or for the purpose of preventing fraud, supporting intelligence and data sharing between agencies like the police, [NCA](#) and local authorities. Section 68 of the Act specifically supports cooperation between law enforcement agencies and local authorities to exchange information as needed.

National Fraud Initiative (NFI) – Local Audit and Accountability Act 2014

Operating under powers vested by the Local Audit and Accountability Act 2014, the NFI facilitates data sharing for the purposes of detecting and preventing fraud.

Part 6 provides the legislative basis for the NFI, allowing public bodies – including local authorities – to share data to prevent and detect fraud.

Section 33 allows data matching exercises, where personal data from different sources is compared to identify potential fraud or crime. Under this section, local councils and law enforcement bodies can share information specifically for fraud prevention, which often overlaps with broader criminality issues.

Local authorities and law enforcement can use this framework to share information to identify fraudulent activities, which is relevant when addressing criminality within housing or other local authority-regulated areas.

Investigatory Powers Act 2016

This Act allows certain public bodies, including law enforcement, to collect communications data under strict controls. Although primarily in place to govern intelligence purposes, it allows for data to be shared in criminal investigations under regulated procedures and in line with the principles of necessity and proportionality.

Part 3 (Authorisations for communications data) governs how certain public bodies (including police and intelligence agencies) may obtain and share communications data to support criminal investigations.

Section 61 deals with the power of designated senior officers within public authorities to authorise the acquisition of communications data (not the content of communications). This authorisation may only be granted where it is necessary and proportionate for purposes such as national security, the prevention or detection of crime, or protecting public safety.

Section 62 (Authorisation procedure) sets out a process for law enforcement to request communications data, which may then be shared with other relevant authorities, providing oversight and limiting access to authorised purposes.

Local Government Act 1972 and 2000

These Acts provide local authorities with general powers to do anything to promote or improve the economic, social and environmental wellbeing of their area. This can

include the sharing of data to prevent and address criminal activities affecting local communities.

Section 111 of the Local Government Act 1972 grants local authorities general powers to do anything (including sharing information) that is calculated to facilitate, or is conducive or incidental to, the discharge of any of their functions. This section provides a broad, though less explicit, basis for data sharing as part of crime prevention initiatives.

Section 2 of the Local Government Act 2000 (Well-being Power) allows local authorities to act in ways that improve the economic, social and environmental wellbeing of their area. Information sharing is permitted if it supports community wellbeing by reducing crime or enhancing safety in local communities.

Digital Economy Act 2017

Part 5, chapter 1 (Public service delivery) enables public authorities to share data to support objectives like improving public service delivery and tackling fraud (directly or indirectly). The Act includes safeguards for the use of data, ensuring it is only shared where necessary and relevant. Necessary and relevant here can extend to criminal investigations when connected to broader service delivery or crime reduction goals.

Section 35 expressly permits data sharing between specified public authorities to address fraud and debt, as well as to assist with law enforcement purposes. Under this Act, local councils and law enforcement bodies can share data for service delivery improvements, including crime reduction in specific community settings.

Section 36 (Debt and fraud) permits the disclosure of information between government departments, local authorities and other public authorities for the purpose of taking action against fraud, which often overlaps with criminal activities within sectors like housing.

Police and Criminal Evidence Act 1984 (PACE)

PACE governs police powers in England and Wales and, while primarily addressing the conduct of investigations, it also sets standards for handling information. Data obtained by law enforcement under PACE may be shared with other authorities if it aligns with the purposes of crime detection, prevention and prosecution, subject to data protection standards.

Housing legislation

Housing Act 2004

Section 237 (Use of information obtained by local authorities) specifically allows local authorities to use and share information obtained for housing enforcement purposes. It permits local authorities to share information collected under housing legislation (such as for licensing, inspections and enforcement notices) with other public authorities if it is necessary for performing their housing duties or for preventing and detecting crime. This is particularly relevant for tackling criminal landlords, illegal evictions or unsafe rental conditions in the [PRS](#).

Local Government and Housing Act 1989

Section 6 (Duty of local housing authorities to have regard to code of guidance) provides a framework for local authorities to work with other agencies and share data

to fulfil their housing duties. This section encourages collaboration among housing authorities, which may include information sharing to support the effective regulation of housing standards. While it does not explicitly authorise data sharing, it supports inter-agency cooperation to address housing issues that may relate to criminal activity.

Housing and Planning Act 2016

Part 2 (Banning orders and rogue landlord database) establishes a national database of rogue landlords and property agents, intended to help tackle serious and repeated housing offences. Local housing authorities must include individuals who are subject to a banning order and may choose to include others convicted of certain housing-related offences. The process includes provisions for notification, appeals to the First-tier Tribunal and updating or removing entries where appropriate.

The aim of the database is to support enforcement, improve transparency in the private rented sector and prevent rogue landlords and agents from moving between local authority areas undetected. Information held in the database can only be accessed and used by local authorities and the Secretary of State for specified statutory purposes. Additional safeguards govern how this information may be used and shared, as outlined in sections 38 – 40 (see below).

Section 38 (Access to the database) requires the Secretary of State to ensure that all local housing authorities in England have access to the national database of rogue landlords and property agents. This enables them to carry out their housing enforcement functions effectively and consistently.

Section 39 (Use of information in the database): local housing authorities may only use information from the database for specific legal purposes, such as enforcing housing standards and investigating breaches of landlord or tenant law. The Secretary of State may use the information for research or statistical purposes and can share anonymised data with third parties. Information may also be shared with HMRC where legally permitted.

Section 40 (Interpretation of Part 2) defines key terms used throughout Part 2, including what is meant by a 'housing enforcement function'. It ensures consistent interpretation and application of provisions relating to access, use and sharing of database information.

Anti-social Behaviour, Crime and Policing Act 2014

Part 1 (Injunctions to prevent nuisance and annoyance) allows local authorities to apply for injunctions against individuals causing anti-social behaviour in housing contexts.

Section 17 (Data sharing for crime and disorder) provides housing enforcement teams with grounds to share data to prevent or reduce anti-social behaviour in residential areas. Data can be shared with the police and other agencies to support efforts to enforce injunctions, community protection notices and closure orders related to problem properties. Section 17 provides a legal basis for local authorities to exchange information with police and community safety partners, particularly in cases where anti-social behaviour intersects with housing enforcement issues, such as illegal evictions or tenant exploitation.

Landlord and Tenant Act 1985

Section 34 (Provision of information by local authorities) permits local authorities to obtain and share information on property ownership for housing enforcement. It enables housing authorities to request and share ownership details of rented properties, which is often necessary for investigating housing conditions, enforcing minimum standards or identifying landlords involved in criminal activities, such as overcrowding or illegal evictions.

Public Health Acts 1936 and 1961

These Acts grant powers to local authorities for addressing housing-related health hazards, including unfit living conditions or overcrowded housing, often linked to criminal landlords.

Sections relevant to housing standards and public health do not directly authorise data sharing but do allow local authorities to collaborate with health and safety agencies to tackle health hazards. Information gathered in public health enforcement (e.g. overcrowding or unsafe buildings) may be shared with housing enforcement to support prosecution or improvement orders.

Environmental Protection Act 1990

Section 80 (Statutory nuisance) enables local authorities to address statutory nuisances related to housing, such as noise, sanitation and environmental hazards. Information obtained under this Act to address nuisances can be shared with other enforcement bodies – including housing enforcement teams – to help improve living conditions and act against landlords creating unsafe or illegal housing environments.

Prevention of Social Housing Fraud Act 2013

Sections 1 – 4 (Offences and investigation powers) create criminal offences for social housing fraud (e.g. unlawful subletting) and provide local authorities with powers to investigate suspected fraud.

Section 4 (Data sharing to prevent fraud) allows local authorities to access data from other public bodies, such as utility companies, to investigate social housing fraud. While focused on social housing, this Act can indirectly support private sector investigations by identifying patterns of illegal subletting or fraud.

These laws are often supported by information sharing agreements (ISAs) or memoranda of understanding (MoUs) between agencies to help ensure that any data sharing is conducted legally, securely and ethically in order to protect individuals' rights while enabling effective responses to criminality.

E3: Data protection – myths debunked

Data sharing plays a vital role in fostering effective partnerships to address crime in the [PRS](#). However, organisations – and individuals within them – often hesitate to share information because they have concerns about breaching data protection regulations. While understandable, this caution can lead to missed opportunities where data sharing would have been lawful and highly beneficial.

[The Information Commissioner's Office \(ICO\) website](#) sets out specific guidance and tools to help organisations share within the law. For further information on how and under what circumstances data can be shared, see the toolkit section on [data protection legislation](#).

Summary of common myths	
Myths about data protection laws	Reality
1 Prevent data sharing	They enable data sharing
2 Prevent sharing sensitive data with law enforcement	They enable such sharing
3 Require detailed agreements	Agreements are good practice for regular or large-scale sharing, but are not required for occasional or small-scale sharing
4 Require 'consent' to share	Consent is one possible basis for sharing. Consent is not needed where there is another lawful basis for sharing
5 Prevent sharing in an emergency	Appropriate action should be taken to save a life
6 Prevents sharing internationally	Data can be shared internationally where appropriate safeguards are put in place
7 Only apply to electronic data	They apply to data recorded in all formats
8 Only apply to large organisations	They apply to all organisations (and individuals) processing data for professional or commercial purposes
9 Exclude anonymised data	If there is a risk of re-identification the laws still apply
10 Do not make data subject requests mandatory	A data subject request must be responded to within one month
11 Require all breaches to be reported	Breaches that pose a risk to individuals' rights and freedoms must be reported to the ICO within 72 hours
12 Require all organisations to have a Data Protection Officer (DPO)	A DPO is only mandatory for public authorities and organisations undertaking large-scale, regular and systematic monitoring or that process large amounts of special category or criminal conviction data

Detailed explanations

Myth 1: *Data protection law prevents the sharing of personal data.*

Fact: Data protection law is designed to enable organisations to share personal data in a manner that is secure, fair and proportionate.

While there have been recent changes to data protection requirements – specifically through the introduction of the [GDPR](#) 2016 and updates to [DPA](#) 2018, the likelihood is that if data is being shared in a way that was proportionate under the previous regime, such activity remains lawful.

Schedule 2, Part 1, paragraph 2 of DPA 2018 sets out the key exemptions that apply to the investigation of crime, allowing for the disclosure of personal data for the purpose of ‘prevention or detection of crime, the apprehension or prosecution of offenders’. Often referred to as the ‘crime and taxation exemption’, this essentially enables organisations investigating a crime to share relevant data with law enforcement agencies without breaching data protection regulations.

Myth 2: *Data protection law prevents organisations from sharing sensitive personal data with the police or other law enforcement authorities (known as ‘competent authorities’ under DPA 2018).*

Fact: The law enables appropriate data sharing to take place when the police or a ‘competent authority’ ask for information to help investigate, prevent, detect or prosecute a crime.³²

For frequent or larger-scale data sharing, adopting a data sharing agreement is recommended to enable sharing to take place in an efficient and lawful manner.

Myth 3: *Data sharing requires detailed agreements.*

Fact: While agreements are good practice in some instances (see above), not having one in place does not prevent the sharing of data. More occasional/small-scale sharing may not warrant the implementation of an agreement – see section on [databases for recording and sharing data](#) for more information.

Myth 4: *Consent from the individual is always needed to share their data with another organisation.*

Fact: Consent is not the only lawful basis for sharing data. You can usually share without consent if you have an appropriate reason to do so. Indeed, often it would be inappropriate to rely on consent.

Suspected criminality and safeguarding individuals against crimes are examples where sharing personal data without consent may be appropriate because this is required by law, ordered by a court, is part of the performance of a public task or can otherwise be justified on the basis that it is in the public interest.

Myth 5: *Personal data cannot be shared in emergency situations.*

Fact: Data protection requirements do not stop the sharing of data in an emergency. Indeed, appropriate action should be taken to save a life.

³² The ICO has a [toolkit](#) for sharing in this situation

Where for example there is a risk of harm to human life, public health and/or national security, information can be shared lawfully. It is good practice to identify different emergency situations that may arise and implement a plan for data sharing in such instances.³³

Myth 6: *Data can only be shared within the same country.*

Fact: Data can be transferred internationally if appropriate safeguards are in place. For further information on the safeguards required, refer to the ICO's website.³⁴

Myth 7: *Data protection requirements apply to electronic data only.*

Fact: If the data is being processed by the organisation, the requirements apply to all forms of personal data, whether held in electronic or paper formats.

Myth 8: *Data protection requirements apply to large organisations only.*

Fact: The rules apply to all organisations (and individuals) that process personal data as part of professional or commercial activity.

Myth 9: *Anonymised data is excluded from data sharing requirements.*

Fact: Anonymised data is outside the scope of data protection laws if there is no way to re-identify the individual. If there is a risk of re-identification, the laws apply.

Myth 10: *Data subject requests can be ignored.*

Fact: Data subject requests must be responded to within one month (under GDPR). Ignoring such requests can lead to enforcement by the ICO.

Myth 11: *All data breaches must be reported.*

Fact: Data breaches that pose a risk to individuals' rights and freedoms must be reported to the ICO within 72 hours. Minor breaches should be documented, but do not need to be reported if they do not pose a risk.

Myth 12: *Data protection officers are required for all organisations.*

Fact: Under GDPR, a data protection officer (DPO) is mandatory for public authorities and organisations that engage in large-scale systematic monitoring or that process large amounts of special category or criminal conviction data. Other organisations can choose to appoint a DPO, but are not required to.

³³ The ICO provides specific information on [data sharing in an urgent situation or in an emergency](#)

³⁴ See ICO's [guide to international transfers](#)

E4: Difference between a memorandum of understanding (MoU) and an information sharing agreement (ISA)

A memorandum of understanding (MoU) is a non-binding document used to outline the general principles and intentions between parties **collaborating on a project**, often used when formal contracts are unnecessary or premature.

An information sharing agreement (ISA) is a legally binding contract that specifies the terms, conditions and protocols for **exchanging data** between entities, ensuring compliance with legal and regulatory requirements. ISAs are used when parties need to share sensitive or personal information securely and lawfully.

The terms are often used in the context of data sharing, but they have distinct purposes and characteristics. The main differences are:

1 Purpose

- **An MoU:**
 - is a broader, non-legally binding document outlining the general intentions and principles of cooperation between parties
 - acts as a framework or starting point for collaboration but does not go into operational specifics
 - covers broader aspects of a partnership, which may include data sharing as one component.
- **An ISA:**
 - is a detailed legal or formal document that specifies the terms, conditions and processes for sharing data between parties
 - focuses specifically on data protection, compliance with laws (e.g. [GDPR](#)), and operational details
 - used to define how data is shared securely and responsibly.

2 Legal status

- **An MoU:**
 - is not legally binding unless explicitly stated
 - is primarily a statement of mutual understanding and goodwill.
- **An ISA:**
 - is legally binding – or can be, depending on its terms
 - includes enforceable clauses regarding data protection, security breaches and liabilities.

3 Level of detail

- **An MoU:**
 - is high-level and broad:
 - usually setting out the purpose of the collaboration
 - usually establishing the general principles guiding the relationship
 - usually acknowledging mutual goals and interests
 - sometimes including a clause referring to a more specific ISA for operational details.
- **An ISA:**
 - is highly detailed, addressing:
 - the specific types of data to be shared

- the legal basis for data sharing
- the roles and responsibilities of each party
- data security measures
- retention and disposal of data
- processes for handling breaches or disputes.

An MoU can often serve as the foundation for an ISA. The MoU establishes the intent to collaborate, creating a shared understanding between the parties, whereas an ISA is then drafted to operationalise and regulate specific aspects of the collaboration, such as data sharing.

E5: Example template for a memorandum of understanding (MoU)

This is an MoU template to support officers in drawing up a customised agreement that meets their specific needs. The template outlines essential components such as the purpose of collaboration, roles and responsibilities of each party, resource allocation, confidentiality clauses and terms of the agreement. It provides a basis for the design of a bespoke framework that ensures effective and clear collaboration among parties.

See also example templates for an [information sharing agreement](#) and for [multi-agency group terms of reference](#).

Title: Memorandum of understanding (MoU) for private rented sector (PRS) data

Date of agreement: [insert date]

Version number: [insert version number]

Review date: [insert date]

1 Purpose of the memorandum

Clearly define the purpose of the MoU. For example:

This MoU establishes a framework for collaboration between [local authority name] and its partners to address issues in the PRS.

Primary objectives include:

- Improving housing standards and enforcement
- Tackling illegal activities linked to PRS properties (e.g. unlicensed landlords, criminal activity)
- Supporting vulnerable tenants
- Sharing data to inform research, policy development and coordinated interventions.

The MoU outlines shared principles, responsibilities and methods of working together. It reflects a shared commitment but does not create legally binding obligations.

2 Parties to the memorandum

In this section, list all organisations involved and their roles in the collaboration. For example:

This MoU is entered into by the following organisations, each of which plays a critical role in the collaborative efforts to address issues within the PRS:

Participating organisations:

Local authority X

- Primary contact person: [name] – [job title] – [email] – [phone number]

- Role in the partnerships (for example)
 - a) Lead organisation responsible for coordinating activities
 - b) Enforcement of housing standards under relevant legislation
 - c) Data analysis and provision of local housing market insights.

Partner organisation A

- Primary contact person: [name] – [job title] – [email] – [phone number]
- Role in the partnerships.

Partner organisation B

- Primary contact person: [name] – [job title] – [email] – [phone number]
- Role in the partnerships.

3 Objectives of collaboration

In this section detail the objectives of the collaboration and what they hope to achieve. For example:

This collaboration will strengthen efforts to tackle criminal activities within the PRS through intelligence sharing, joint operations and targeted enforcement. By pooling resources and expertise, the parties will enhance community safety and disrupt illegal practices that undermine the integrity of the housing market.

The parties agree to collaborate to achieve the following objectives:

- a) Identify and address criminal activities in the PRS
 - Share intelligence on crimes associated with PRS properties, including but not limited to modern slavery, human trafficking, fraud, illegal subletting and drug-related offences
 - Use shared data to map high-risk properties and landlords, prioritising enforcement and intervention actions.
- b) Disrupt criminal networks operating in PRS properties
 - Work together to investigate and disrupt criminal operations that exploit PRS properties, including those involving vulnerable tenants or illegal uses of residential housing
 - Conduct joint operations and inspections to gather evidence and enforce relevant laws.
- c) Protect vulnerable tenants from criminal exploitation
 - Identify and support tenants who may be victims of criminal activities, ensuring they receive appropriate safeguarding and legal protection
 - Provide clear communication channels for tenants to report suspected crimes without fear of retaliation.
- d) Enhance enforcement and prosecution efforts
 - Develop coordinated approaches to enforcement actions, including case building for prosecutions related to criminal activities in the PRS
 - Share expertise and resources to ensure effective use of enforcement tools and legal remedies.

4 Principles of cooperation

In this section, detail the principles to be followed by each party while working together to achieve the objectives of the collaboration. For example:

The parties commit to fostering a collaborative and effective partnership by adhering to the following guiding principles:

a) Mutual respect and cooperation

- Recognise and value the unique roles, expertise and priorities of each participating organisation
- Foster a culture of collaboration, ensuring that all contributions are acknowledged and that decision-making processes reflect the input of all parties.

b) Transparency

- Maintain open and honest communication about shared goals, activities and challenges related to this MoU
- Clearly articulate any planned data-sharing arrangements, operational changes or modifications to the agreement, ensuring that all parties remain informed and aligned.

c) Accountability

- Take collective and individual responsibility for meeting the commitments outlined in this MoU
- Establish clear reporting mechanisms to track progress, resolve disputes and address any lapses in commitment or performance.

d) Legal and ethical compliance

- Comply with all applicable laws and regulations, including but not limited to the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and relevant housing and criminal justice legislation
- Ensure that all actions and decisions are guided by ethical considerations, with particular attention to safeguarding the rights and wellbeing of tenants and vulnerable individuals.

e) Data security and privacy

- Protect the confidentiality and security of any data shared under this agreement, ensuring it is handled responsibly and in compliance with data protection laws
- Develop and adhere to protocols for secure data sharing, limiting access to authorised personnel and ensuring that shared data is used solely for the purposes outlined in this MoU
- Implement measures to prevent data breaches, unauthorised access or misuse and respond promptly and transparently to any such incidents.

f) Flexibility and adaptability

- Acknowledge the dynamic nature of challenges in the PRS and remain open to adapting strategies, methods and approaches as necessary to achieve shared objectives
- Regularly review the principles and commitments under this MoU to ensure they remain relevant and effective.

5 Collaborative activities

This section outlines the joint activities the parties will undertake to achieve the MoU's stated objectives.

The parties commit to undertaking the following main activities to achieve the objectives outlined in this MoU:

a) **Information sharing**

The parties will establish protocols for securely sharing information and data, ensuring compliance with the UK GDPR and the Data Protection Act 2018. This includes the use of shared databases or communication platforms to report, monitor and track housing issues, criminal activities and enforcement actions. Information sharing will be guided by the principles of accuracy, relevance and proportionality to support effective collaboration while safeguarding sensitive data.

b) **Joint initiatives**

The parties will collaborate on specific projects and programmes to tackle criminality in the PRS and improve housing conditions. Examples include:

- Undertaking joint inspections or raids on PRS properties
- Hosting landlord training workshops to promote compliance with housing standards
- Organising community events and outreach campaigns to raise awareness about housing standards, tenant support services and the role of enforcement actions
- Conducting tenant rights seminars to empower tenants with knowledge about their legal protections.

c) **Meetings and communication**

Regular meetings will be held (e.g. quarterly or as agreed) to discuss progress, address challenges and plan upcoming initiatives. Communication channels will be established, with designated points of contact for each party to ensure timely and effective coordination of activities.

6 Data sharing framework

In this section, detail data sharing procedures to be followed by each party while working together to achieve the objectives of the collaboration. This could also include a cross-reference to a separate information sharing agreement (ISA) For example:

The parties to this MoU acknowledge that all data-sharing activities will comply with the principles and obligations outlined in the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

What data may be shared

- **Property data:** information on landlords, property addresses, licensing status, enforcement actions and compliance with housing standards
- **Tenant data:** anonymised or aggregated tenant demographics, complaints and indicators of vulnerability (e.g. risk of exploitation or unsafe living conditions)

- **Incident data:** reports of anti-social behaviour, criminal activity or other concerns relevant to enforcement and tenant protection.

Conditions for sharing data

- Data will be shared strictly for the purposes outlined in this MoU, such as identifying high-risk properties, combating crime in the PRS and protecting vulnerable tenants
- Sensitive information, including personal and health-related data, will only be shared when necessary, with appropriate safeguards in place to ensure compliance with data protection laws
- All shared data must be accurate, relevant and proportionate to the intended purpose, and parties will take reasonable steps to ensure data quality and security.

Data security and access

- Shared data will be handled securely and only accessed by authorised personnel within the parties' respective organisations
- Breaches or misuse of shared data will be reported immediately and corrective actions will be taken in line with the ISA and applicable legal frameworks.

[Optional] Detailed technical and legal arrangements for data sharing are governed by a separate ISA, which complements this MoU and sets out the specific terms, conditions and safeguards for handling shared information.

7 Governance and monitoring

This section is crucial for maintaining the effectiveness, accountability and sustainability of the partnership throughout its term.

A steering group will be established to oversee the collaboration, comprising representatives from each participating organisation. This group will be responsible for setting strategic priorities, monitoring progress and addressing any challenges that arise. Regular meetings will be held, typically on a quarterly [or other specific time] basis or as otherwise agreed by the parties in order to review the partnership's activities and ensure alignment with the objectives of this MoU.

Each party will report on their contributions to the shared objectives through agreed-upon mechanisms, providing updates on activities such as enforcement actions, tenant support initiatives and data-sharing outcomes. Success will be measured against clear indicators – see separate guidance on [measuring performance](#). The steering group will use these reports to evaluate the effectiveness of the partnership and identify areas for improvement or additional focus.

8 Dispute resolution

This section establishes procedures to be followed for resolving conflicts. For example:

In the event of a disagreement or conflict arising from the interpretation or implementation of this MoU, the following procedures will be followed to ensure prompt and effective resolution:

- Disputes will initially be addressed at the operational level by the designated contacts for each party, who will work collaboratively to identify the root cause of the issue and agree on a solution. If the matter cannot be resolved at this stage, it will be escalated to senior management within each organisation. Senior managers will review the dispute, taking into consideration the terms of this agreement, relevant legal frameworks and the objectives of the MoU
- If this does not resolve the dispute the designated contacts for each party will escalate the matter with the steering committee for a resolution as per their governance arrangements
- If the issue remains unresolved after escalation, the parties may agree to seek independent mediation or legal advice to facilitate a resolution. All parties are expected to act in good faith throughout the process to maintain a cooperative working relationship and ensure the continuity of data sharing under this agreement.

By establishing this structured approach to dispute resolution, local authority X and its partners demonstrate their commitment to addressing conflicts constructively and maintaining the integrity of the ISA.

9 Funding and resources (if applicable)

This section details how resources will be allocated to collaborative activities and the funding of any commitments. For example:

- **Resource allocation**

The parties agree to allocate and manage resources collaboratively to ensure the effective implementation of the activities outlined in this MoU. Resources may include financial contributions, personnel, technical expertise or equipment. Each party will specify their commitments, including any in-kind contributions, such as office space, IT infrastructure or volunteer support. Resource allocation will be reviewed periodically to ensure alignment with the partnership's objectives and operational needs

- **Funding sources and commitments**

Funding to support this collaboration may come from a variety of sources, including government grants, local authority budgets, private sector contributions or joint fundraising efforts. Each party will outline their financial commitments in writing, including specific amounts and intended purposes, such as funding enforcement operations or tenant support programmes. Where additional funding is required, parties will work together to identify and secure appropriate funding sources to sustain the partnership and expand its impact.

10 Duration and termination

This section sets out the timelines and conditions for reviewing the MoU. For example:

This MoU will take effect from [insert start date] and remain in force until [insert end date], unless terminated earlier by mutual agreement of all parties. Any party may withdraw from this MoU by providing [insert notice period, e.g. 30 days']

written notice to all other parties, clearly outlining the reasons for their withdrawal and any transitional arrangements required.

The MoU will be reviewed on an annual basis to ensure it remains fit for purpose and reflects any changes in legislation, policy or operational priorities. If significant developments occur that affect the scope or objectives of the collaboration, an interim review may be conducted at the request of any party to address these changes and update the agreement as necessary.

11 Amendments

This section outlines procedures to be followed if any changes to the MoU are required. For example:

Any amendments to this MoU must be made in writing and agreed upon by all parties. Proposed modifications should be submitted in writing to the steering group or designated representatives for review at least [insert timeline, e.g. 30 days] prior to the desired effective date of the amendment.

The steering group will review and discuss the proposed changes at the next scheduled meeting or during an extraordinary session convened for this purpose. Amendments will take effect only after being formally approved by consensus or majority agreement, as determined by the governance structure and signed by authorised representatives of each party. All amendments will be documented and shared with all parties to ensure transparency and alignment.

12 Signatories

Include the names, positions and signatures of authorised representatives from all parties.

By signing this MoU, the parties affirm their commitment to the principles and objectives outlined:

[Local authority name]:

Name: [insert name]

Position: [insert position]

Signature: _____

[Partner organisation A name]:

Name: [insert name]

Position: [insert position]

Signature: _____

[Partner organisation B name]:

Name: [insert name]

Position: [insert position]

Signature: _____

Optional annexes

Annex A: Glossary (key definitions of terms used in the MoU to avoid ambiguity)

Annex B: Key contacts list (name, position, organisation contact details)

Annex C: Summary of related agreements (e.g. ISAs, steering committee terms of reference)

Annex D: Roles and responsibilities matrix (details of specific roles and responsibilities)

Annex E: Success indicators and metrics (further details on measurements of success of the collaboration)

Annex F: Legal and policy framework (key relevant legislation and policies underpinning the collaboration).

E6: Example template for an information sharing agreement (ISA)

This is an ISA template to support officers in drawing up a customised agreement that meets their specific needs. The template outlines essential components such as the purpose of data sharing, legal authority, data description, access protocols, security measures, confidentiality clauses and terms of agreement. It provides a basis for the design of a bespoke framework that ensures effective and secure information sharing between parties.

See also example templates for a [memorandum of understanding](#) and for [multi-agency group terms of reference](#).

Title: Information sharing agreement (ISA) for private rented sector (PRS) data

Date of agreement: [insert date]

Version number: [insert version number]

Review date: [insert date]

1 Purpose of the agreement

In this section, clearly define the purpose of the ISA. For example:

The primary aim of this information sharing agreement (ISA) is to set out the terms and conditions under which data concerning private rented sector (PRS) properties will be shared between local authority X and its partner organisations. The agreement ensures compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other relevant legislation, establishing a robust framework for lawful and secure data sharing.

Collaboration between local authority X and partner organisations is crucial in improving housing standards, reducing crime and supporting vulnerable tenants. By working together, these organisations can pool resources and intelligence to tackle issues related to the PRS, ultimately fostering a safer, more secure living environment for residents.

This data sharing is necessary to facilitate the identification of unlicensed properties to provide targeted support for tenants who may be at risk and to address criminal activities associated with the PRS, such as fraud, anti-social behaviour and exploitation.

2 Parties to the agreement

In this section, list all organisations involved and their roles in the data sharing. For example:

This ISA involves multiple organisations that play key roles in the processing and sharing of PRS data.

- **Data controllers:** these organisations are responsible for determining the purposes and means of processing personal data. In this agreement, local authority X serves as the primary data controller, overseeing the management of data to ensure it is used lawfully and ethically

- **Data processors:** in certain cases, partner organisations may act as data processors, meaning they handle the data on behalf of the data controller under agreed-upon instructions.

The organisations involved are:

- Local authority X
- Partner organisation A
- Partner organisation B.

Each organisation has a designated primary contact responsible for managing data-related activities:

- Local authority X: [name] – [job title] – [role]
- Partner organisation A: [name] – [job title] – [role]
- Partner organisation B: [name] – [job title] – [role].

Roles and responsibilities are clearly defined for each party, ensuring a structured approach to data sharing. For instance:

- Local authority X handles data pertaining to property inspections and tenant complaints
- Partner organisation A provides ...
- Partner organisation B collaborates ...

3 Legal basis for sharing

In this section, specify the legal justification for sharing under UK GDPR. For example:

Under UK GDPR, the legal justification for sharing personal and special category data must be clear. For local authority X and its partners, several lawful bases are identified for data processing:

Article 6(1) outlines general lawful processing grounds, such as:

- **Public task:** local authority X processes data to fulfil its statutory duties in managing housing standards and enforcing housing laws
- **Legal obligation:** the sharing of certain data may be mandated by legislation, such as the Housing Act 2004 and the Crime and Disorder Act 1998, which empower local authority X to collaborate with law enforcement and other bodies for public protection.

Additionally, for special category data under Article 9(2), local authority X ensures that processing meets conditions like:

- **Substantial public interest:** sensitive data, such as tenant vulnerability or health-related issues, may be shared where there is a clear need to protect individuals from harm or ensure public safety.

This agreement is also supported by the Housing Act 2004 and the Crime and Disorder Act 1998, which enable data sharing for public protection and housing enforcement.

This ISA references key legislative provisions that support the necessity and legality of data sharing, ensuring all activities are compliant with the highest standards of data protection and transparency.

4 Data to be shared

In this section, define exactly what data will be shared. For example:

To ensure clarity and transparency in the data sharing process, this section defines the specific categories of data that will be exchanged between local authority X and its partner organisations. The data shared will directly support the objectives outlined in this agreement, such as improving housing standards, addressing unlawful activities and safeguarding vulnerable tenants in the PRS.

Categories of data to be shared

- **Personal data** refers to any information that can directly or indirectly identify an individual. This may include:
 - **names:** for example, the names of tenants, landlords and property managers associated with PRS properties
 - **addresses:** full property addresses, including those suspected of being unlicensed, reported for unsafe conditions or criminal activity or under investigation for legal non-compliance
 - **contact details:** email addresses and phone numbers of landlords, property managers or tenants, as needed for enforcement actions, tenant support or communication about licensing requirements.

These details are crucial for contacting individuals involved in PRS operations, addressing complaints and facilitating tenant protections:

- **Operational data** refers to information related to the management, regulation and enforcement of housing standards. Examples include:
 - **complaints:** records of tenant or neighbour complaints regarding poor housing conditions, illegal evictions or landlord negligence
 - **inspection records:** findings from housing inspections, such as evidence of hazards, unfit living conditions or breaches of housing laws
 - **licensing status:** data on whether a property is properly licensed under local housing regulations, including dates of application, approval or revocation
 - **enforcement actions:** details of legal or regulatory actions taken against landlords, such as fines, notices or prosecutions
- Sharing operational data ensures all partners have access to the information needed to identify trends, allocate resources and coordinate responses effectively.
- **Special category data (if applicable):**
In some cases, sensitive personal data may be shared, particularly when addressing the needs of vulnerable individuals or protecting public safety.
This may include:

- **vulnerability indicators:** data on individuals identified as vulnerable due to age, disability or social circumstances, enabling targeted interventions and support
- **health data:** for instance, information about tenants with medical conditions that make them particularly susceptible to the risks of unsafe housing.

The sharing of special category data will be strictly limited to situations where there is a clear and lawful basis under Article 9 of the UK GDPR, such as safeguarding individuals from harm or addressing substantial public interest issues.

By defining these categories of data, this agreement ensures that data sharing is purposeful, relevant and compliant with legal requirements, while also safeguarding the rights and privacy of individuals.

5 Data protection principles

In this section, reaffirm adherence to data protection principles. For example:

This agreement reaffirms the commitment of all parties to adhere to the core principles of data protection as outlined in the UK GDPR and the Data Protection Act 2018. These principles serve as the foundation for ensuring that personal data are processed lawfully, ethically, and securely. Each organisation involved in the data sharing process must embed these principles into their practices to protect the rights and privacy of individuals while enabling effective collaboration.

- a) **Lawfulness, fairness, and transparency:** inform individuals about the data sharing through privacy notices
- b) **Purpose limitation:** use data only for the agreed purposes
- c) **Data minimisation:** share only what is strictly necessary
- d) **Accuracy:** ensure data are accurate and updated regularly
- e) **Storage limitation:** retain data only as long as necessary
- f) **Integrity and confidentiality (security):** data must be processed in a way that ensures its security
- g) **Accountability:** organisations are responsible for demonstrating compliance with the data protection principles.

6 Data security measures

In this section, detail the technical and organisational measures which should be adhered to in order to protect any data which is shared. For example:

To ensure the protection of personal and sensitive data shared under this agreement, all parties commit to implementing robust technical and organisational security measures. These measures are designed to safeguard data against unauthorised access, loss or misuse while maintaining its integrity and availability. Each organisation must ensure compliance with these standards as a condition of participation in this agreement.

Technical measures:

- **Encrypted file transfers:** all data exchanged between parties must be transferred using secure methods, such as encrypted email services, virtual

private networks (VPNs) or secure file-sharing portals. Encryption ensures that data cannot be intercepted or accessed during transmission

- **Secure storage systems:** data must be stored in secure environments with appropriate technical protections, such as firewalls, anti-virus software and intrusion detection systems
- **Access control mechanisms:** systems containing shared data must be protected by role-based access controls, ensuring that only authorised personnel can view or edit the data. Strong password policies, multi-factor authentication and regular access reviews are mandatory.

Organisational measures:

- **Access limitation:** access to shared data will be restricted to individuals who require it for their roles. Each organisation must maintain an up-to-date list of authorised personnel and ensure they receive appropriate training in data protection and security
- **Audits and monitoring:** regular audits will be conducted to ensure compliance with this agreement and identify potential vulnerabilities. Monitoring systems will track data access and use to detect any unauthorised activity
- **Incident management:** in the event of a data breach or security incident, affected parties must be notified immediately and appropriate measures taken to contain and address the issue. A formal incident response plan should be in place within each organisation.

Risk assessments:

Each organisation will carry out regular risk assessments to identify and mitigate potential security risks associated with data sharing. These assessments should include:

- Evaluating the risks of unauthorised access, accidental loss or corruption of data
- Reviewing the effectiveness of existing security measures
- Implementing additional safeguards as necessary based on identified risks.

By adhering to these measures, local authority X and its partners ensure that shared data are handled securely and responsibly, protecting the privacy and rights of individuals while enabling the achievement of shared goals.

7 Retention and disposal

In this section detail procedures to be followed by each partner the retention and disposal of data, remembering that some types of organisations might have their own requirements. For example:

To ensure compliance with data protection principles [add in any other specific industry requirements], this agreement establishes clear guidelines for the retention and secure disposal of data shared between Local Authority X and its partner organisations. These measures aim to prevent the unnecessary retention

of personal data and reduce the risks associated with over-storage, while ensuring that data remains available for legitimate purposes during its lifecycle.

Retention periods:

- Data shared under this agreement will be retained only for as long as it is required to achieve the purposes outlined in section 1 of this document
- In most cases, data will be retained for a maximum of **12 months**, after which it must be securely deleted
- Exceptions may apply if the data is required for ongoing investigations, legal proceedings or regulatory purposes. In such cases, retention periods may be extended, but only as necessary and in compliance with legal requirements.

Disposal of data:

- On the expiration of the retention period, all data must be securely and permanently deleted
- Organisations must use industry-standard methods for data destruction, such as:
 - overwriting electronic data using certified secure deletion tools.
 - physically destroying storage media, such as shredding hard drives or degaussing.
 - securely disposing of printed documents, by for example cross-cut shredding or certified incineration
- Disposal processes must be documented, with records maintained to demonstrate compliance.

Shared responsibilities:

- Each party to the agreement is responsible for ensuring the secure retention and disposal of data within their control
- Local authority X will coordinate with its partners to review data retention schedules regularly and confirm the secure disposal of expired data
- Partners must notify local authority X of any data requiring extended retention and provide a clear justification for the extension.

Accountability:

- All parties must maintain records of retention and disposal activities, including the dates and methods used for data deletion
- Regular audits may be conducted to verify compliance with these provisions.

By adhering to these retention and disposal guidelines, local authority X and its partners ensure that shared data are managed responsibly, reducing risks to privacy while supporting the objectives of this agreement.

8 Individual rights

This section outlines how individual data subjects can exercise their rights, For example:

This agreement ensures that the rights of individuals whose data are shared under its terms are fully respected and protected. Local authority X and its partner organisations are committed to upholding the rights granted to data subjects under the UK GDPR and the Data Protection Act 2018. These rights include accessing their personal data, rectifying inaccuracies, and, where applicable, requesting erasure or restriction of processing.

Accessing shared data:

- Individuals have the right to request access to their personal data shared under this agreement
- Requests for access (subject access requests or SARs) can be submitted to any of the organisations party to this agreement. Each organisation is responsible for responding to SARs in compliance with legal requirements, typically within one month of receipt
- The response must include:
 - details of the data being processed
 - the purposes of the processing
 - the recipients or categories of recipients with whom the data has been shared.

Rectifying inaccuracies:

- If an individual identifies errors or inaccuracies in their personal data, they have the right to request correction
- On receiving such a request, the relevant organisation must promptly verify the claim and update the data as necessary
- If the data has been shared with other parties under this agreement, those parties must also be notified of the correction to ensure consistency and accuracy.

Requesting erasure or restriction of processing:

- Individuals may request the erasure of their data where:
 - the data is no longer necessary for the purposes for which it was collected
 - consent (where applicable) has been withdrawn and no other legal basis for processing applies
 - the data has been unlawfully processed
- Erasure requests will be assessed on a case-by-case basis and any legal or operational requirements that may necessitate continued retention (e.g. for legal investigations or compliance with statutory obligations) will be considered
- Alternatively, individuals can request a restriction of processing, particularly in situations where:
 - they contest the accuracy of the data
 - the processing is unlawful, but they oppose erasure
 - the data are required solely for legal claims or disputes.

Exercising rights:

- Individuals must be informed of their rights through clear privacy notices provided by each organisation involved
- Requests to exercise these rights can be submitted to any of the parties involved in the data sharing. Organisations must cooperate to ensure timely and comprehensive responses to such requests.

Accountability:

- Each organisation is responsible for maintaining records of data subject requests and actions taken in response
- Periodic reviews of processes and practices will be conducted to ensure compliance with individual rights and regulatory requirements.

By prioritising these rights, local authority X and its partners demonstrate a commitment to transparency, accountability and the fair treatment of individuals whose data are shared under this agreement.

9 Data breach reporting

This section details the steps to be taken by each party if a data breach occurs. For example:

In the event of a data breach involving information shared under this agreement, all parties must take immediate and coordinated action to mitigate harm, investigate the cause and comply with regulatory requirements. This section outlines the process for managing breaches, including communication, investigation and reporting protocols.

Definition of a data breach:

A data breach is any event that leads to the unauthorised access, disclosure, alteration, loss or destruction of personal data. Examples include, but are not limited to:

- Cyberattacks compromising shared data
- Accidental disclosure of personal data to unauthorised recipients
- Loss or theft of physical or electronic devices containing shared data.

Process for handling breaches:

a) Immediate notification:

- Any party discovering a potential or confirmed breach must notify all other affected parties, including local authority X, within **24 hours** of discovery
- Notifications should include:
 - the nature and scope of the breach
 - the categories and volume of data involved
 - initial assessments of potential risks to individuals.

b) Joint investigation:

- Upon notification, the parties will conduct a **joint investigation** to determine the cause, extent and impact of the breach
 - The investigation will:
 - assess the risk to data subjects.
 - identify immediate actions to mitigate further harm.
 - develop a plan for corrective measures to prevent recurrence.
 - Local authority X will act as the coordinator for the investigation, ensuring timely communication and collaboration between all parties.
- c) **Communication with affected individuals:**
- If the breach poses a high risk to the rights and freedoms of data subjects, affected individuals must be notified promptly
 - Notifications will include:
 - a description of the breach and its potential consequences
 - steps being taken to address the breach
 - advice to individuals on how they can protect themselves, such as changing passwords or monitoring accounts.
- d) **Reporting to the Information Commissioner's Office (ICO):**
- Serious breaches that pose risks to individuals' rights must be reported to the ICO within **72 hours** of discovery
 - The report will include:
 - details of the breach and the categories of data affected
 - actions taken or planned to mitigate harm
 - contact information for further inquiries
 - Each party is responsible for notifying the ICO if the breach pertains to data within their control.
- e) **Post-breach actions:**
- Parties will review the circumstances surrounding the breach and update their security measures to prevent similar incidents
 - Lessons learned from the breach will be documented and shared among the parties to improve overall data security.

By establishing this breach management protocol, local authority X and its partners ensure a unified and effective response to data incidents, protecting the rights of individuals and maintaining compliance with legal obligations.

10 Review and monitoring

This section sets out the timelines and conditions for reviewing the ISA. For example:

This ISA will be reviewed on an annual basis to ensure it remains relevant, effective and compliant with current legislation, technological advancements and operational needs. However, an earlier review may be initiated if significant changes occur, such as amendments to data protection laws, the implementation of new technology that impacts data sharing processes or substantial alterations to the objectives or scope of the agreement. All parties involved will collaborate during the review process, providing feedback on the agreement's practical application and proposing any necessary updates or improvements. Regular monitoring and review ensure the ISA continues to support its intended purpose while adapting to changing requirements and circumstances.

11 Dispute resolution

This section establishes procedures to be followed for resolving conflicts. For example:

In the event of a disagreement or conflict arising from the interpretation or implementation of this ISA, the following procedures will be followed to ensure prompt and effective resolution:

- Disputes will initially be addressed at the operational level by the designated contacts for each party, who will work collaboratively to identify the root cause of the issue and agree on a solution. If the matter cannot be resolved at this stage, it will be escalated to senior management within each organisation. Senior managers will review the dispute, taking into consideration the terms of this agreement, relevant legal frameworks, and the objectives of the data sharing initiative.
- If the issue remains unresolved after escalation, the parties may agree to seek independent mediation or legal advice to facilitate a resolution. All parties are expected to act in good faith throughout the process to maintain a cooperative working relationship and ensure the continuity of data sharing under this agreement.

By establishing this structured approach to dispute resolution, local authority X and its partners demonstrate their commitment to addressing conflicts constructively and maintaining the integrity of the ISA.

12 Signatories

Include the names, positions, and signatures of authorised representatives from all parties.

By signing this ISA, the parties agree to follow the principles and objectives outlined:

[Local authority name]:

Name: [insert name]

Position: [insert position]

Signature: _____

[Partner organisation A name]:

Name: [insert name]

Position: [insert position]

Signature: _____

[Partner organisation B name]:

Name: [insert name]

Position: [insert position]

Signature: _____

13 Annexes (if needed)

Could include for example:

Annex A: Dataflow diagram (to show how data will be shared)

Annex B: Detailed privacy notices (for transparency)

Annex C: *Relevant legislation*

Annex D: *Further GDPR information*

Annex E: *Information sharing request form*

F: Working with partners

F1: Building effective partnerships

To be successful, partnerships must have a shared overarching objective that aligns with the goals of all participants. This objective should be consistent with each member's organisational aims, ensuring that every participant understands how the partnership's success will advance or fulfil their own requirements and ambitions. Failing to address this critical issue is a significant factor in partnerships underperforming and ultimately failing.

A second, closely related consideration is the individuals representing the member organisations. Generally, the more senior the representatives, the easier it is to secure buy-in and prompt action toward the partnership's objectives. Conversely, if junior representatives are involved, it is essential to recognise how this might hinder swift progress and take steps to address potential challenges.

Local authority housing enforcement teams play a vital role in addressing criminality and organised crime in the [PRS](#). However, the complexity of these issues means that success requires collaboration with a wide range of partners, including other local authorities, police, government agencies (such as DWP, Home Office, Immigration Enforcement and [HMRC](#)), charities and other community organisations. The following steps are useful to support the building of effective partnerships:

1 Understand the problem

- **Acknowledge the problem:** recognise that criminals do operate or use the PRS as part of their own business models and that this cannot be tackled without working with others
- **Map local issues:** where possible, and if data is available, conduct an analysis of local [PRS-related criminal activities](#), such as drug trafficking, illegal subletting, modern slavery and people trafficking, fraudulent landlord practices and unsafe housing conditions
- **Identify interdependencies:** recognise where criminality overlaps with other areas, such as human trafficking, modern slavery, financial fraud and drug-related crime
- **Identify potentials:** identify and understand how other partners could contribute to tackling these challenges, from law enforcement to victim support.

2 Initiate contact to get a better overall picture

- **Work with [other council departments](#):** such as council tax, planning, housing benefit, [ASB](#) team
- **Engage local partners:** collaborate with other local authorities to share best practices, intelligence and resources, especially in cross-border cases
- **Involve key agencies:** forge [partnerships with other agencies](#) such as the police, fire services, [HMRC](#), the Home Office, Immigration Enforcement and Trading Standards to address specific aspects of PRS-related crime

- **Collaborate with charities:** work with organisations that specialise in supporting vulnerable groups (such as victims of modern slavery) or in exploitation
- **Identify common problems:** arrange initial meetings and highlight shared concerns about criminality and organised crime in the PRS and communities.

3 Develop a partnership framework

- **Nature of collaboration:** decide on the type of the partnership to build between the different organisations that is appropriate for the overall aim of the project(s) – see [Appendix B](#).
- **Joint assessment:** assess the nature and scale of the issues and define the objectives of the partnership (e.g. reducing crime, improving housing conditions, reducing exploitation and tackling illegal activities) and set specific, measurable goals that align with the priorities of individual partners and the overall partnership
- **Draw up formal agreements:** establish a [memorandum of understanding](#) (MoU) to act as a framework for the partnership, defining roles and responsibilities and more operational data sharing details (including exemptions as detailed in [DPA 2018](#), Schedule 2) via an [information sharing agreement](#) (ISA). It is important, first of all, to be completely clear on the [difference between an MoU and an ISA](#).

4 Enhance communication and trust

- **Regular meetings and sharing:** schedule multi-agency meetings to discuss progress for ongoing cases, emerging issues, share data and intelligence, and refine strategies – for detailed information on important considerations that frame multi-agency meetings and information sharing, see sections on [data protection legislation](#), [debunking common data protection myths](#) and [terms of reference for partnership groups](#)
- **Transparency:** maintain openness about objectives, share updates, challenges and success stories to build trust among partners
- **Confidentiality and integrity:** ensure sensitive information is handled appropriately
- **Shared communication channels:** use secure digital platforms to share information and updates in real-time where possible – for further related information, see section on [databases for sharing intelligence and data](#).

5 Leverage legal and regulatory tools

- **Housing enforcement powers:** use civil penalties, prosecutions, prohibition orders, landlord licensing schemes and other local authority powers to address non-compliance and deter criminal activity – for further detail see [enforcement actions available to local housing authorities](#)
- **Other partner powers:** use powers from partner agencies for effective joint working to address criminal activity
- **POCA:** work with financial investigation units to recover assets obtained through illegal activity in the PRS.

6 Provide training and education

- **Specialist skills development:** offer training to local authority teams and others on recognising signs of organised crime, such as drug cultivation, modern slavery, people trafficking and illegal subletting – for further guidance, see section on [training for enforcement officers](#)
- **Training for partners:** offer training sessions for partners to help them identify housing-related criminality and understand enforcement processes
- **Awareness raising:** engage with landlords, tenants and community members about reporting mechanisms and legal obligations.

7 Evaluate and adapt

- **Measure success:** track success of partnerships through key metrics such as enforcement actions taken, criminal cases prosecuted and improvements in housing conditions
- **Review partnerships:** gather feedback from partners and regularly evaluate the effectiveness of collaborative efforts and adjust strategies as needed
- **Scalability:** identify successful initiatives that can be scaled or replicated in other areas or districts.

8 Publicise success stories

- **Promote case studies:** share the results of successful multi-agency efforts via social media, newsletters and communications departments to deter criminal activity and build public confidence – for further information, see section on [publicising a criminal landlord initiative](#)
- **Recognise contributions:** acknowledge the efforts of all partners to reinforce morale and commitment
- **Highlight the value of the partnership:** encourage continued and expanded collaboration with existing and new partners.

F2: Terms of reference exemplar for partnerships

This is a model template for terms of reference specifically designed to guide groups collaborating on tackling criminality in the PRS and undertaking data sharing initiatives. The template incorporates essential elements such as the group's objectives, member roles and responsibilities, data sharing protocols, decision-making processes and confidentiality agreements. Each project will vary in scope and complexity. For this reason, the template will need to be tailored to align with the specific size and nature of the initiative. It provides a basis for the design of a bespoke foundation to support effective collaboration, secure information exchange and good governance.

Multi-agency partnership group to tackle [insert group initiative]

Purpose

The multi-agency partnership group (hereafter referred to as 'the group') is established to provide a strategic forum on behalf of the statutory, non-statutory and third sector organisations who contribute to tackling [insert initiative].

Aims

The primary objectives of the group are to: [insert main objectives – add separate section for specific aims if required]

Examples:

- Facilitate the exchange of information and intelligence among member agencies to effectively address [insert initiative]
- Develop and implement joint strategies to identify and support victims of [insert initiative]
- Enhance the capacity of member agencies through training, knowledge sharing and resource pooling
- Advocate for, and support, the implementation of relevant national and regional policies
- Raise public awareness about [insert initiative] and encourage reporting of suspected cases
- Monitor and evaluate the effectiveness of initiatives to tackle [insert initiative].

Membership

Membership of the group is open to any partner working in, or delivering services in, [insert locality]. Partners are encouraged to invite representatives from other organisations to [insert initiative] meetings if they can contribute to the group's aims and objectives and/or would benefit from the partnership opportunities which the meetings offer.

Members will include representatives from key agencies, including but not limited to:

- [List relevant members]
- [List relevant members]

Each agency will nominate a representative to participate in the group. Members should have sufficient authority to make decisions or escalate issues within their respective organisations.

Roles and responsibilities

- **Chair:** the chair will lead meetings, ensure agendas are followed and oversee the implementation of action points. The role will rotate annually among member agencies
- **Secretary:** the secretary will record minutes, manage communications and coordinate meeting logistics
- **Members:** members are responsible for contributing to discussions, sharing relevant data and implementing agreed actions within their agencies.

Conduct of meetings

- Meetings will be held quarterly, with additional meetings convened as necessary
- Agendas will be circulated at least one week in advance
- A quorum will consist of representatives from at least 50% of member agencies
- Decisions will be made by consensus wherever possible. If consensus cannot be reached, a majority vote will be taken
- Contact point for the meetings is via [insert contact email address].

Reporting and accountability

The group will:

- Submit annual reports to relevant stakeholders, including [insert relevant stakeholders]
- Maintain transparency by publishing summaries of activities and outcomes
- Establish sub-groups or task forces as needed to address specific issues.

Confidentiality

All members must adhere to data protection laws, including the UK General Data Protection Regulation (GDPR) and maintain the confidentiality of sensitive information shared within the group.

Review of terms of reference

These terms of reference will be reviewed annually to ensure they remain relevant and effective. Amendments must be agreed by the majority of members.

Dissolution

The group may be dissolved if its objectives are deemed to have been achieved or if its continuation is no longer necessary. A decision to dissolve the group requires the agreement of all member agencies.

Signatories

By signing below, each member agency agrees to the terms of reference and commits to active participation in the group.

Agency name: _____
Representative name and role: _____
Signature: _____
Date: _____

Agency name: _____
Representative name and role: _____
Signature: _____
Date: _____

Agency name: _____
Representative name and role: _____
Signature: _____
Date: _____

Agency name: _____
Representative name and role: _____
Signature: _____
Date: _____

F3: Other local authority services to work with and how they can help

To address criminality in the [PRS](#) effectively, local authority housing enforcement teams must not only collaborate with external organisations but also work closely with other council services. Strong internal collaboration allows for a unified and efficient approach to identifying and addressing criminality, ensuring that all available resources, expertise and intelligence are effectively deployed.

In England, the shape and organisation of services in local government varies significantly. But irrespective of whether authorities are unitary or two-tier and regardless of their internal structure, by working with other departments – including those which deal with housing issues – housing enforcement teams can share information, streamline processes and develop holistic strategies to tackle criminal activity in PRS properties.

A significant number of PRS properties were formerly social housing premises sold through the right-to-buy scheme. As a result, many local authority housing estates now contain a substantial proportion of private rented homes. If the local housing authority has retained its own housing stock, private sector housing officers can collaborate with their counterparts managing social housing. These social housing teams have valuable insight into local issues, tenant demographics and potential concerns, including concerns about PRS properties in the estate. This collaboration can enhance enforcement efforts, improve housing conditions and help identify and address any criminal or anti-social behaviour within the community.

Teams should also keep in mind that collaborating with neighbouring councils and their respective departments is essential, as criminal activity often spans boundaries.

Below is a short overview of key council departments that can support housing enforcement teams, along with an explanation of their roles and how they may be able to assist:

Council tax teams can provide housing enforcement teams with valuable data on property occupancy, changes in residence and unpaid council tax – which may indicate potential issues such as illegal subletting, overcrowding or unregistered properties. In particular, they hold information on who is liable for council tax at a property. In the rented sector liability for council tax depends on the type of tenancy. (For example, landlords are typically responsible for council tax where the tenants are not living as a single household – such as a house that has been turned into bedsits or a property where individuals rent a specific room. By contrast, tenants are typically responsible for council tax where they are living as a single household, for example co-habiting spouses, relatives or friends who have joint responsibility for the tenancy.) This information can help identify properties which are non-compliant with housing regulations or which are being used for criminal activities. The department will also hold information on how council tax is paid. If payments are being made in cash and for a long period in advance, it could indicate that the property is being used for illicit purposes.

Housing benefit is still paid by local councils for eligible tenants – particularly tenants of pension age or tenants already receiving it before the introduction of universal credit. People claiming housing benefits need to provide proof of identity, their date of

birth, national insurance number, bank/income information, information on rent (and whether this includes charges for utilities/services) and their landlord's details, plus, when renting privately, a tenancy agreement or letter from the landlord confirming the tenancy is required.

Council anti-social behaviour (ASB) teams deal with a range of issues such as abusive and threatening behaviour, drug and alcohol related matters, hate incidents, prostitution and other nuisance behaviours. Organised crime generally manifests in associated anti-social behaviour (for example, among individuals visiting properties being used as a brothel and/or to sell drugs). ASB teams may therefore hold information about the type of activity linked to particular properties and problem individuals. Joint working between ASB teams, housing enforcement and the police can be effective in identifying links to organised crime and in tackling both the ASB and more serious underlying criminality (such as sexual exploitation, criminal exploitation and cuckooing). Action may include court orders to ban specific behaviour by specific individuals, prosecution/fines and, in conjunction with the police, closure orders prohibiting access to the affected property.

Environmental crime teams deal with a range of issues such as graffiti, littering (and drug paraphernalia), noise, fly-tipping, untidy gardens and abandoned vehicles. There may be value in coordinating joint disruption activity (for example issuing warrants together). In the case of cannabis farms, the police may remove the plants but leave behind some elements (such as soil, lighting, transformers). To ensure these are legally disposed of (and prevent re-use for further illegal activity and/or fly-tipping), the environmental crime department can serve the notice to the landlord requiring proof of legal disposal. It is therefore essential that they are made aware of when action is being taken by other agencies.

Environmental health teams are responsible for ensuring public health and safety, which includes monitoring factors like sanitation, waste management, noise, air quality and pest control in both residential and commercial properties. For residential areas, they may focus on housing conditions, while for commercial properties, they ensure businesses comply with health and safety regulations, food safety standards and environmental protection laws. During their inspections, officers may come across issues that are relevant to PRS enforcement teams, particularly in respect of identifying potential criminal activity or unsafe living conditions related to commercial properties.

During inspections of commercial properties (such as restaurants or shops), officers might discover unlicensed or substandard accommodation being used as living quarters for employees or for others. This could involve overcrowding, fire hazards or unsanitary conditions that may be linked to illegal or exploitative living arrangements. Also, serious health and safety violations in a commercial property that may impact tenants' welfare (such as poor ventilation, unsafe cooking facilities or mould) could be useful information for PRS enforcement teams investigating landlord neglect or criminal behaviour related to the property. Finally, environmental health officers may notice signs of overcrowding in commercial properties, particularly in spaces where workers might be living in substandard conditions. This could indicate criminal exploitation, such as modern slavery or human trafficking, and should be flagged for further investigation by PRS enforcement teams.

Planning services hold information about properties and whether, for example, planning applications have been submitted to convert the property into flats or an [HMO](#). This information can be used to cross reference whether claims made by the landlord are correct or whether, for example, attempts are being made to avoid licensing requirements or to use the property for criminality. Information about who made the planning application may also help to shine a light on who the landlord is.

Social care and children's services play a vital role in safeguarding vulnerable people, including tenants who may be at risk of exploitation or living in unsuitable housing conditions. Their involvement is especially crucial when addressing cases involving modern slavery, trafficking or child safeguarding within the PRS. Social services can work with PRS enforcement teams to identify tenants who may be exposed to unsafe or overcrowded living conditions, and they are often the first to spot signs of exploitation or neglect. Social workers can help identify modern slavery and trafficking victims who may be coerced or trafficked into labour or sexual exploitation, particularly when they are being forced to live in dangerous, overcrowded or unsanitary conditions. They may even have access to information about the landlord and rental payments – how paid and how often. Additionally, children's services can assist with cases involving child neglect or abuse related to inadequate housing, ensuring that children living in unsuitable properties are protected from harm. By working closely with PRS enforcement teams, social services contribute to safeguarding both adults and children, while also ensuring that criminal exploitation in the sector is addressed and prevented.

Children missing education teams (CMET) work to identify and support children who are not attending school, ensuring they are safeguarded and provided with appropriate education. The information a CMET holds about children who are missing from education can be valuable to PRS enforcement teams, as it may indicate situations where children are living in unsafe or exploitative housing conditions or involved in criminal activities such as running county lines. By sharing data about children's whereabouts, including when they move areas, CMET can help enforcement teams identify vulnerable tenants or uncover properties being used for illegal activities such as trafficking or overcrowded living arrangements.

Information governance teams can assist PRS enforcement teams by providing guidance on data sharing protocols, ensuring compliance with data protection laws (such as [GDPR](#)), and helping to handle sensitive information about tenants, landlords and property investigations safely. Their expertise ensures that PRS enforcement teams can access and share relevant data efficiently while maintaining legal compliance and protecting individuals' privacy.

Council marketing and communication teams can support PRS enforcement teams by helping raise awareness about the work of the team. They can assist with public campaigns, provide information on how tenants can report issues and highlight successful enforcement actions. Their expertise in communication ensures that key messages about tackling criminality in the PRS, upholding safe housing standards, available resources and legal requirements reach both tenants and landlords, helping to foster a better-informed community and encourage compliance with housing laws.

Council legal services play a crucial role in supporting PRS enforcement teams by providing legal advice and guidance on the interpretation and application of housing laws. They assist in drafting and issuing legal notices, preparing cases for prosecution

and representing the council in court, if necessary. Legal services ensure that enforcement actions are carried out in compliance with the law, helping to secure convictions or penalties for landlords and tenants who violate housing regulations, and offering legal support during investigations into criminal activities within the PRS.

F4: Useful external organisations to partner with

To tackle criminality in the [PRS](#) effectively, local authority housing enforcement teams need to collaborate with a wide range of external organisations at a local, regional and national level, as well as their own internal council departments.

These partnerships enable a coordinated approach to identifying and addressing issues in PRS properties, including criminality. By working with external organisations such as law enforcement, other government agencies, charities, utility providers and community groups, housing enforcement teams can share intelligence, pool resources and develop targeted strategies to disrupt criminal networks and protect vulnerable tenants. Strong inter-agency cooperation is essential for creating safer, more regulated communities.

Below, is an overview of potential partners and a short explanation of what they do and how they may be able to help.

This paper should be read alongside other relevant papers in the toolkit, including the one on [working with utility providers](#), which examines how utility data can help detect signs of criminal activity, and on [building effective partnerships](#), which emphasises the value of multi-agency collaboration in achieving shared objectives.

Local and regional partners:

Police forces are key external partners. They can provide intelligence, conduct investigations and carry out enforcement actions in properties where crime is taking place. They may have data that can help local authorities identify key individuals linked to properties and crime trends affecting specific communities. Joint operations to access properties can maximise the respective powers of the police and local authorities. For example, the local authority sometimes has greater powers of entry to housing than the police or can get access faster than the process the police have to go through to get a warrant. The police are also vital in community initiatives such as Clear, Hold, Build and they have valuable expertise and knowledge in specialist areas such as drugs, organised crime and economic crime.

Trading Standards estate and managing/letting agency teams are responsible for enforcing compliance with legislation governing the behaviour of estate and managing/letting agents. Collaborating closely with local authority housing enforcement teams benefits both parties and is particularly effective when officers are co-located. Trading Standards teams can share intelligence about non-compliant agents or landlords involved in illegal practices, helping PRS enforcement teams target problem operators more effectively. They are especially valuable for sharing data and intelligence, particularly through their [IDB](#) database, to which local authorities can subscribe. Trading Standards teams often have access to data and complaints from tenants, landlords and agents that local authorities may not possess. In some cases, they can take further action, such as accessing communication and financial data. Because they have additional powers, they can also conduct covert operations to gather evidence, investigate widespread non-compliance and prosecute under consumer protection laws. They have recently run a major initiative called Operation Jigsaw, which has looked at a more coordinated approach aimed at tackling criminal estate and managing/letting agents by identifying non-compliance, sharing intelligence

and taking enforcement action to protect tenants and landlords – see the section dedicated to [Trading Standards](#) for more detail.

Immigration Enforcement (IE) is a national agency, but they also operate regional offices called Immigration, Compliance and Enforcement (ICE), which can work with local authorities. ICE can verify the legal immigration status of tenants and landlords, identifying people who may be unlawfully living in or letting properties. This can be useful to help distinguish between victims of trafficking and individuals complicit in exploitation and may be able to verify the legitimacy of a passport. ICE can also enforce and support compliance with right to rent legislation, ensuring that landlords do not rent properties to individuals without legal immigration status. They have access to immigration records, travel history and other Home Office databases, providing insights into individuals who may be using false identities or engaging in fraudulent activities. They can support PRS investigations and can conduct raids and inspections, particularly in cases of suspected illegal overcrowding or undocumented occupants. By combining their unique powers, access to sensitive information and expertise, IE can strengthen the ability of PRS enforcement teams to identify and address criminal landlords and protect vulnerable people.

Illegal money lending teams (IMLTs) are specialised units established to combat illegal money lending activities (loan sharking) across the UK. Collaboration such as intelligence sharing, joint operations, tenant support and education, and community engagement can help tackle illegal money lending in PRS properties, especially lending involving landlords. See the section on [housing fraud and financial exploitation](#) for more information about the work of IMLTs.

Fire and rescue services, while not necessarily a primary partner on criminality, may be able to share key information where they suspect criminality or breaches relating to PRS properties, particularly identified during fire inspections. Further, some criminality creates hazardous conditions – such as cannabis cultivation overloading the electrical supply and water damage creating fire risks. For this reason, local authorities will need to work with their fire and rescue services to conduct risk assessments and to ensure properties meet safety standards – or, if necessary, are closed down. They may also have information about commercial properties that are linked to PRS properties.

Local or regional residential landlord associations (RLAs) are organisations that provide support, resources and representation for landlords who own and manage residential rental properties. These associations often aim to promote good practice, ensure compliance with legal obligations and advocate for landlords' interests. They are a key partner for getting landlords to adopt practices that reduce opportunities for criminal activity in private rented properties. Local authorities and RLAs may collaborate to run awareness campaigns targeting landlords, tenants and the local community about specific types of criminality.

Tenant associations are organisations or groups formed by tenants to collectively advocate for their rights, address common issues and improve living conditions in rental properties or communities. They are mainly formed by social tenants and less often found within the [PRS](#).

Housing and homelessness charities (such as Shelter and St Mungo's) are key partners for supporting tenants, but may also be able to share information with housing

enforcement teams about properties and concerns about criminal activity, and they can help identify patterns of exploitation or hotspots in the PRS.

Other charities; there are a range of other charities that may be able to share information with housing enforcement teams and/or support tenants (as victims of crime). Some of these may have a local presence, but others may operate on a national basis only. Examples include:

- [Citizens Advice](#)
- [Shelter](#)
- [MIND](#)
- [Crisis](#)
- [Big Issue Foundation](#)
- [St Mungo's](#)
- [Salvation Army](#)
- [Centrepoint](#)
- [Depaul UK](#)

Healthcare and mental health services workers may encounter signs of physical and/or psychological abuse among patients that are indicative of exploitation. Sharing information between healthcare and local authorities can help identify and support victims within the PRS.

Neighbourhood crime reduction partnerships bring together local partners such as police, fire and rescue, local authorities, health and probation to determine specific strategies for tackling crime, disorder and anti-social behaviour in the community. They may have information on PRS-related crime that is useful.

Other property/housing organisations (such as housing associations or supported housing providers) which manage other types of properties in the local area – i.e. ones that neighbour PRS properties – may be useful partners. Joint working will help in tackling criminality that impacts on different properties within a community or area.

National partners:

[**National Crime Agency \(NCA\)**](#) is the lead agency for serious and organised crime in the UK. It assesses how organised criminals are operating nationally and how they can be disrupted. The NCA works with regional organised crime units (ROCUS), local police forces and other government departments and agencies.

[**HM Revenue and Customs \(HMRC\)**](#) is the UK's tax, payments and customs authority, collecting the money used to pay for public services. HMRC has responsibility for investigating non-compliance with the tax system and has a wide range of civil and criminal powers to secure compliance with the laws. They can assist with investigations involving financial exploitation or illegal work practices and can help detect businesses operating out of the PRS where exploited individuals are forced to work. They can also assist with rent-to-rent operators avoiding tax obligations.

[**Department for Work and Pensions \(DWP\)**](#) is responsible for welfare (benefits), pensions and child maintenance. Fraud officers investigate suspected benefit fraud. Action can include reduction/withdrawal of benefits, reclaiming overpaid benefits,

penalties (as an alternative to prosecution), confiscation of homes and possessions and prosecution.

Home Office Immigration Enforcement (IE) is the part of the Home Office responsible for preventing abuse of the immigration system, increasing compliance with immigration law, pursuing immigration offenders and protecting vulnerable people. IE works with partners across law enforcement, wider government and the private and voluntary sectors to fulfil this brief at a regional level.

Utility providers (electricity, gas and water) ensure that properties meet safety standards and help identify properties with illegal connections or unsafe installations.

National Residential Landlord Association (NRLA) is the UK's largest membership organisation for private residential landlords in England and Wales. It aims to ensure landlords operate legally and ethically, while representing their interests in policy discussions.

Gangmasters & Labour Abuse Authority (GLAA) is a non-departmental public body (NDPB) governed by an independent board with the aim of protecting vulnerable and exploited workers. The GLAA is the lead agency for labour exploitation within certain sectors, and it investigates labour-related offences under the Modern Slavery Act 2015. For more information on the context of the GLAA's work see the toolkit section on [modern slavery and human trafficking](#).

Safer Renting provides specialist advice, support and advocacy for tenants of criminal landlords.

The Government Agency Intelligence Network (GAIN) is a collaboration of law enforcement partners and government agencies and partners who work together to tackle and disrupt serious and organised crime via intelligence sharing, the exchange of information and joint working.

Health and Safety Executive (HSE) is the regulator for workplace health and safety. The HSE investigates industrial accidents and proposes health and safety regulations.

Companies House, although not a partner as such, maintains a register of UK companies useful for intelligence and data. There is now a requirement for identity verification of individuals wishing to incorporate a company. They therefore hold additional information that PRS enforcement teams can get access to.

F5: Clear, Hold, Build

Background

Clear, Hold, Build (CHB) is a structured framework inspired by a military operating model used by the police at a local level to tackle organised crime, gang activity and persistent anti-social behaviour. It was designed by the Home Office and is based on the experiences of several forces that piloted the approach. CHB brings the tackling of serious and organised crime into neighbourhood policing and recognises the importance of addressing the root causes of crime, and not just the symptoms.

The model ensures that there is involvement and partnership with the local community and that the local response is sustainable. The core aims are reclaiming and rebuilding communities persistently affected by crime; and restoring the relationship between residents, the police and statutory agencies.

The **Clear** stage targets and removes [OCGs](#) from specific areas. This is achieved through high-impact operations such as arrests, search warrants and intelligence-driven raids that focus on key figures/leaders.

The **Hold** stage stabilises the area, with visible policing and proactive measures to prevent other individuals and/or OCGs from taking the place of those that were removed, and ultimately to prevent the re-escalation of criminal activity.

The **Build** stage involves working with statutory agencies and community partners to implement initiatives that tackle the drivers of crime (improving the living, working and recreational environment for residents) to foster local resilience against crime.

The approach has been rolled out among police forces in England and Wales, after early signs of success by pilot forces. Local authorities, including housing enforcement teams, have been involved as partners in a range of action taken, for example, serving civil penalties on landlords for licensing offences.

Benefits and challenges

The approach has several specific benefits:

- Focusing on both immediate and long-term solutions: CHB offers a balanced and sustainable approach to community safety
- Restoration of order: by clearing criminal elements, the strategy directly reduces immediate threats and crime rates, creating a safer environment
- Enhanced security presence: the Hold phase establishes consistent law enforcement and provides community reassurance, deterring criminals who thrive in unmonitored spaces
- Community trust and cooperation: the Build phase fosters goodwill through improved infrastructure, services and community engagement, making it harder for criminal organisations to gain local support
- Long-term stability: by addressing root causes of crime (e.g. poverty, lack of education and unemployment), the strategy takes a holistic approach for sustainable crime reduction rather than temporary suppression.

The CHB strategy faces several challenges. It is resource-intensive and requires significant investment in staffing, funding and time. Criminal networks may adapt, relocate or retaliate, causing ongoing instability, while excessive force or lack of transparency can erode community trust. Effective coordination among law enforcement agencies, authorities and development agencies is often difficult, and clearing areas may create power vacuums exploited by new criminal groups. Additionally, delays in delivering visible improvements during the Build phase and cultural or political resistance can undermine the strategy's effectiveness and lead to a resurgence of criminal activity.

How housing enforcement can work with the police during CHB activities

Local authority housing enforcement teams focusing on the [PRS](#) can benefit from the CHB framework in several ways:

- **Enhanced collaboration:** working alongside police and other agencies during the Clear phase allows for coordinated actions against criminal landlords and others who may be complicit in criminal activities, ensuring that properties are not used for illicit purposes
- **Sustained compliance:** the Hold phase's emphasis on maintaining security supports housing enforcement efforts by deterring landlords and others from reverting to previous criminal activities, thereby promoting adherence to housing standards
- **Community engagement:** during the Build phase, joint initiatives can be developed to educate landlords and tenants and the public about their rights and responsibilities, providing a safer environment and fostering a culture of compliance and improving housing conditions.

By integrating the CHB strategy, housing enforcement teams can proactively address issues in the PRS, moving beyond reactive measures to establish a more robust and collaborative approach to community safety and housing quality.

Case study: CommUnity Harehills

The CommUnity Harehills project, which is based on the [CHB](#) initiative, aims to reduce serious and organised crime through a structured three-phase approach. This model was first implemented in Leeds as part of a national pilot programme by West Yorkshire Police, collaborating closely with local councils and community organisations.

In the Clear phase, authorities targeted and disrupted criminal networks, removing active threats by making arrests, executing warrants and seizing illegal assets.

This included the following achievements:

- Dismantling of two out of the four [OCGs](#) targeted
- 59% reduction in violent crime
- 46% reduction in offences involving weapons
- 257 arrests
- 387 people stopped and searched
- 59 warrants executed
- £8.2m worth of cannabis seized and removed from the streets

- £62,796.80 worth of items seized, including 2,582 packets of illicit cigarettes, 85 bags of hand-rolling tobacco and 1,185 illegal vapes
- Convictions for multiple offences, including possession of drugs with intent to supply and cannabis production, resulting in custodial sentences amounting to 39 years
- 12 licence reviews and eight licences revoked from premises
- Multiple days of action, including one where £450,000 worth of illicit cigarettes were seized
- Eight successful closure orders
- Seven civil penalties served by the council's PRS housing team on landlords for licensing offences.

During the Hold phase – which is where the Harehills currently is in the project lifecycle – police maintain a visible and strong presence to prevent criminals from re-establishing operations, strengthening the sense of security for residents. Finally, the Build phase will focus on nurturing a safer environment by partnering with local organisations and services to enhance community resources and address underlying issues contributing to crime, such as housing conditions and social support networks.

Through this initiative, Harehills has experienced significant reductions in crime rates. There has been a reported 59% decrease in violent crime and a 46% drop in offences involving weapons, alongside targeted landlord licensing enforcement to tackle housing-related criminal activity. This approach has improved public safety but has also supported community resilience, showing a sustainable path forward for other neighbourhoods facing similar issues.

The council housing team, including the [CLU](#) has played a critical role in the Clear, Hold, Build initiative in Harehills not only as project partners but also by addressing issues relating to housing conditions and landlord compliance, particularly involving managing agents. This has included enforcing regulations that ensure landlords meet licensing requirements, thereby reducing the potential for criminal activity associated with poorly managed rental properties. They have issued civil penalties for licensing offences, which help to hold landlords to account and improve the overall quality of housing in the area. This enforcement not only enhances living conditions for tenants but also contributes to the broader strategy of community safety by reducing environments vulnerable to crime. Additionally, the council continues to work closely with police and other agencies to ensure that residents feel supported and safe in their homes.

Councillor Debra Coupar (Deputy Leader at the time of writing) emphasised in the press the importance of this collaboration:

It fosters a community-wide commitment to tackling anti-social behaviour and ensures residents feel secure in their neighbourhoods. By combining resources and expertise, the council's housing team and law enforcement have effectively disrupted organised crime and improved community safety.³⁵

³⁵ See [Yorkshire Evening Post, 'Harehills: crime down in Leeds neighbourhood as police share details of operation resulting in 250 arrests'](#), 11 March 2024

Summary

CHB offers a route for enhancing housing enforcement and improving quality of life for tenants, particularly within the [PRS](#) and broader communities. By systematically addressing criminality, ensuring sustained security and supporting community development, CHB has the potential to create safer neighbourhoods, reduce tenant exploitation and encourage compliance with housing regulations. The Build phase further strengthens the impact by improving local infrastructure, services and trust among stakeholders, ensuring that both landlords and tenants can thrive in a fair and well-regulated environment. When implemented effectively, CHB not only deters criminal elements but also paves the way for long-term stability and a stronger sense of community ownership.

For details on specific CHB work taking place in your area, have a look on your local police force website. For further general information about CHB, visit the [College of Policing website](#)

F6: Trading Standards

Trading Standards are a key partner for local councils trying to tackle crime in the private rented sector. Their powers complement local housing authority powers, allowing comprehensive action to be taken against criminals who use the PRS as part of their business model.

Their services also play a vital role in supporting local economies, protecting consumers and maintaining a fair and safe trading environment for businesses. Trading Standards departments sit within each local authority and are often referred to in legislation as the local weights and measures authority. Local councils provide most of the funding for the service and approve related policies and budgets.

Trading Standards cover a wide range of issues, not just housing-related. As part of any operation or effort to disrupt criminal activity, they can use tools beyond those specifically related to housing, particularly where premises are dual use (such as flats above shops) and where they have powers to protect consumers. In respect of their housing-related powers, Trading Standards teams enforce the Tenant Fees Act, which regulates what fees are chargeable. While tenants are expected to pay a holding deposit and rent, there are specific rules governing how these payments must be handled.

Permitted fees include rent, bills and changing a tenant's name on the contract. Unless specified in the Act, all other fees are prohibited. The aim is to make all costs transparent and to remove the possibility of surprise hidden charges.

Check-in and check-out fees, being forced to pay for professional cleaning, and fees for credit checks and completing an inventory are all now outlawed. The Renters' Rights Bill brings forward draft provisions on bidding wars, tenants and pets, and demands for upfront rent payments.

For the Tenant Fees Act 2019, the lead enforcement authority is Bristol City Council which works with Powys County Council, the lead enforcement authority for the Estate Agents Act 1979. The two functions run jointly as part of the National Trading Standards Estate and Letting Agency team.

The Trading Standards team is responsible for the regulation of estate agency in the UK and for overseeing enforcement in the lettings agency sector in England. This work involves:

- Overseeing the operation of relevant estate and letting agency legislation
- Issuing prohibition and formal warning orders to operators found unfit to engage in estate agency work in the UK
- Approving and overseeing the UK's consumer redress schemes, ombudsmen and alternative dispute resolution entities in the estate agency sector
- Publishing generic guidance and advice for the public, businesses and enforcement authorities on estate agency work in the UK and relevant letting agency work in England.

Trading Standards teams usually have several suitably qualified and accredited financial investigators who are authorised and trained to carry out financial

investigations. These officers work in partnership with housing enforcement officers to investigate any [POCA](#)-related offences. POCA allows an agency to seize assets resulting from criminal activities and to retain a portion of these for the good of the community. This means that criminals are financially punished, while agencies and the wider community benefit from additional funds to support their needs. Examples of how money received from POCA has been used in Leeds include:

- Funding additional resources for the police to undertake operations
- Providing play equipment for a local park in the Clear, Hold, Build area
- Supporting a food bank and school uniform exchange pop up shop. The rent for the shop is paid through the proceeds of POCA.

Where there is evidence to support a prosecution under the legislation, Trading Standards will lead the investigation and will apply to the courts for production orders, disclosure orders, restraint orders, confiscation orders or cash seizures. For more guidance on addressing proceeds of crime issues, see the section on [financial recovery through POCA](#).

The team also provides training to enforcement officers via an e-learning platform, in-person events and regular webinars. This training is aimed mainly at local authority officers authorised to enforce the associated legislation.

The recent Operation Jigsaw is a leading example of this kind of training and close partnership working between agencies. The project was aimed at helping teams collaborate better in the private sector housing enforcement community. Regional leads were asked to help authorities find ways to work together to support each other and they have established regional groups which work together nationally to share best practice and raise concerns. Although scheduled to close in March 2025, at the time of writing the project had received additional funding to extend its operational life.

The team works with industry stakeholders to ensure that issues are addressed quickly and that appropriate advice and guidance are available to help businesses undertake their work in a safe and equitable trading environment. This reassurance is crucial to businesses who need to know that action on non-compliance is prioritised and that advice and penalty policies are consistent across local authority boundaries. This is particularly important as new legislation (such as the Renters' Rights Bill) is enacted and comes into force, because businesses operating in more than one local authority need to be sure that they are not expected to follow different rules in different areas.

As part of closer collaboration, agencies can target criminal activity in mixed-use premises more effectively. Trading Standards can address commercial issues related to counterfeit goods, such as cigarettes, vapes and alcohol, while Housing Officers can focus on residential concerns. Joint working also ensures that all agencies can make the most of their powers, conduct thorough inspections of the entire premises and secure access to all areas.

This joined-up working supports all partners involved, for instance in addressing issues in flats above shops where there is potential for criminal activity linked to both the commercial (e.g. illegal tobacco and alcohol) and residential (e.g. human trafficking, modern slavery or drugs) parts of the premises. Working together enables the whole scope of criminal activity to be targeted, allowing all agencies to work to address issues from both commercial and residential aspects. For example, this approach helps

prevent the storage of illegal goods in residential parts of premises where Trading Standards, licensing colleagues and, in many cases, the police have no legal right of entry.

Trading Standards use Intelligence Database IDB as their data storage system, All Trading Standards teams nationwide have access to the system and can make data contributions. Other agencies, such as the police, can use IDB and local housing authorities can also have access, allowing the sharing of information across several agencies. While there is a cost for housing officers, IDB is a valuable tool for gathering and recording intelligence on criminal activity linked to housing, helping to build a broader understanding of criminality in the [PRS](#). By subscribing to IDB, housing officers gain access not only to intelligence from Trading Standards but also to police intelligence on criminals who exploit the PRS as part of their business model. The more the system is used, the greater the intelligence gathered, leading to a better understanding of criminal activity in the sector.

F7: Working with utility providers

It is useful to read this section alongside the guidance sheet [Energy theft: spot the signs](#), kindly supplied by Rachael White at British Gas and included in the toolkit at Appendix C.

Why it is important

Local authority housing enforcement teams and utility providers should work closely together to identify and address criminality in [PRS](#) properties, particularly on the operation of cannabis farms. When criminals set up cannabis farms in private properties, they nearly always manipulate the gas and electricity supply to power the operation in order to avoid being detected or hit with major fuel bills.

Manipulation of the supply creates severe fire and explosion risks because it often involves illegal wiring and can lead to overloading circuits and gas leaks, endangering not only the property but also neighbouring homes. These set-ups can lead to power outages, carbon monoxide poisoning and structural damage, leaving landlords with costly repairs and tenants in unsafe living conditions.

What criminals do to properties

Criminals may tamper with the electricity and/or gas supply for the cultivation of their plants. These are the kinds of things they might do.

Electricity tampering

- **Bypassing the electricity meter:** criminals may illegally tamper with the electricity meter to bypass recording their energy consumption. This allows them to steal electricity without being billed – which is crucial because cannabis farms need a lot of power for lights, heaters and fans
- **Illegal wire connections:** criminals often connect directly to the mains supply by illegally splicing into electrical cables leading into the meter. These set-ups are typically unregulated and poorly carried out, creating serious fire and electrocution hazards
- **Overloading the circuit:** high-intensity discharge (HID) lamps, fans and other equipment use enormous amounts of power, leading to overloaded circuits. This can cause frequent power surges, tripped fuses and even electrical fires
- **Trying to hide excessive power usage:** to avoid detection, criminals may stagger equipment use or add devices like energy usage limiters. They also use soundproofing and insulation to prevent neighbours from hearing loud fans or noticing unusual heat.

Gas tampering

- **Bypassing the gas meter:** criminals similarly bypass the gas meter to steal gas for heating purposes. Tampered-with gas connections can involve dangerous, unregulated pipework
- **Using gas-powered heating:** gas is often used to run heaters that maintain the warm temperatures cannabis plants need to thrive. These systems are usually unsafe and create risks of gas leaks and carbon monoxide poisoning

- **Illegally reconnecting a supply:** If a property's gas or electricity has previously been lawfully disconnected (e.g. by a utility company), criminals may illegally reconnect it without proper authorisation.

How utility providers can help housing enforcement teams

Although some utility companies are more proactive than others in data monitoring and revenue protection, housing enforcement teams can receive alerts or data from utility providers about properties with suspicious energy consumption.

Indicators for energy providers may include:

- Automated alerts (e.g. from smart meters within properties) that suggest tampering
- Customer refusals to grant access to energy providers
- Suspicions that customers are not paying enough for their likely usage (ie, energy consumption that does not align with the property's characteristics or national averages).

Additionally, little or no energy usage in a specific private rental property may indicate that meters have been bypassed – another common sign of cannabis farming. All these factors can prompt the utility provider to start an investigation, which may uncover further criminal activities beyond energy theft.

Once such information is received by the housing enforcement team, they can cross-reference it with other sources, such as reports from neighbours or property inspections, to identify potential cannabis farms. They can also investigate whether these properties are linked to others (for instance through having the same landlord or managing agent) and then assessing these properties for their energy usage and potential involvement in cannabis farming.

Where there is strong indication of high energy consumption in an area, joint work with the police to use drones to heat-map the locality can be effective in identifying the specific properties where cannabis farms may have been set up. However, some caution is needed with this approach, as there can be legitimate reasons for high heat output (e.g. crypto-harvesting). Police may use drones for other purposes, and when doing so, identify instances of properties with a high heat output, which they then report to partners for investigation.

If a property is flagged as suspicious, housing enforcement teams may conduct an inspection, often in partnership with the police and other relevant agencies. Utility providers may themselves obtain a 'no notice' warrant to access a property to address an emergency (ie, a danger to the supply) or where criminal activity is suspected. During visits, utility providers may assist by disconnecting power to ensure safety during the inspection.

Utility providers also play an important role in making a property safe after the discovery of a cannabis grow by. This they do by disconnecting tampered-with or dangerous energy supplies and ensuring that gas and electricity systems are properly inspected and repaired. They also help secure the property by reinstating lawful energy connections, reducing risks of fire, electrocution or gas leaks.

Conclusion

By working together, local authority housing enforcement teams and utility providers (along with other partners) create a more robust system for identifying and addressing cannabis farming in the PRS, helping to mitigate the associated risks and harms.

G: Monitoring and reviewing progress

G1: Measuring success

Measuring success in tackling criminality (including organised crime in the private rented sector) is complex and multifaceted. While certain outcomes can be quantified – such as the number of enforcement actions or reductions in reported crime – not all successes are easily measurable. The impact of interventions can often be seen in less tangible ways, such as improvements in community safety, long-term behaviour changes or the enhanced capacity of authorities to prevent and respond to criminal activity. Therefore, assessing the effectiveness of local authority efforts requires a combination of clear metrics and broader, more qualitative indicators to fully understand the scope and success of these initiatives.

Here are some suggested indices:

1 Enforcement actions and outcomes

- Number of Inspections: increased inspections of rental properties to ensure compliance with regulations
- Violations identified: tracking the number and types of violations found during inspections
- Enforcement notices issued: counting the number of notices issued for repairs, improvements and other compliance requirements
- Prosecutions and convictions: the number of prosecutions brought against landlords and the outcomes of these cases
- Civil penalties and fines: total fines and civil penalties imposed on offending landlords
- Prohibition orders: number of orders issued.

2 Reduction in criminal action

- Official statistics: police figures on crime reduction
- Disruption of criminal activity: for example, the number of cannabis farms disrupted and gangs and OCGs dismantled
- Preventative action: such as the street value of drugs removed from the area.

3 Tenant satisfaction and complaints

- Reduction in complaints: monitoring the number of tenant, neighbour and community complaints about landlord practices and the conditions of rental properties and any associated criminal behaviour
- Tenant feedback: surveys and feedback from tenants about their rental experiences and the responsiveness of local authorities to their issues.

4 Community feedback

- Resident perceptions of safety: surveys and anecdotal evidence from residents about their sense of security before and after interventions

- Community engagement sessions: number and outcomes of public forums, workshops and community meetings on rental sector crime issues
- Neighbourhood Watch involvement: level of participation from local communities in reporting criminal activities or unsafe rental conditions
- Online and social media feedback: monitoring public sentiment through local online forums and social media discussions related to [PRS](#) crime
- Success stories from tenants and neighbours: collecting and publishing testimonials from people who have seen improvements as a result of enforcement efforts.

5 **Property availability, standards and conditions**

- Property availability: the number of houses brought back into the PRS
- Improvements in property conditions: measuring improvements in housing conditions, such as reduced levels of damp, disrepair and overcrowding
- Compliance rates: percentage of rental properties meeting health and safety standards.

6 **Licensing and registration**

- Registration: the number of landlords and rental properties registered or licensed with the local authority
- Licensing compliance: levels of compliance in registration
- Renewal rates: monitoring the renewal rates of licences to ensure ongoing compliance.

7 **Awareness and education**

- Landlord training programmes: number of landlords participating in educational programmes on legal responsibilities and best practice
- Information campaigns: effectiveness of campaigns aimed at informing landlords and tenants about their rights and responsibilities
- Highlighting successes: publishing successful outcomes of operations.

8 **Homelessness and housing stability**

- Reduction in evictions: tracking the number of evictions and their causes, aiming for a reduction in illegal or unjust evictions
- Homelessness rates: monitoring changes in homelessness rates as a result of improved rental practices, though it may be difficult to discern whether changes are related to national trends or shifts in the housing market generally.

9 **Inter-agency collaboration**

- Interagency development: number and expansion of partnerships and collaborations
- Partnerships and collaborations: measuring the effectiveness of collaboration between different agencies (e.g. housing, health and police) in addressing landlord criminality

- Joint operations: number and success of joint operations targeting criminal landlords
- Targeted areas: specific successes in particular areas or against specific types of criminality (such as drugs and cannabis farms)
- Intelligence: number of pieces of intelligence submitted to other agencies
- Feedback: from partners and the third sector, as well as government agencies.

10 Data collection and reporting

- Annual reports: publishing annual reports detailing actions taken, successes achieved and areas needing improvement
- Performance metrics: establishing clear performance metrics and regularly reporting against these metrics.

11 Tenant advocacy and support services

- Support services usage: tracking the use of tenant advocacy services and support programmes
- Resolution rates: the success rate of resolving tenant issues through mediation or legal assistance.

By employing a combination of these metrics, local authorities can gauge and demonstrate their success in tackling landlord criminality in the PRS, and ensure continuous improvement in housing standards and tenant wellbeing.

G2: Learning lessons

Setting up a criminal landlord unit (CLU) within a local authority presents both significant challenges and rewarding opportunities to address housing issues and improve the safety and wellbeing of tenants. As local authorities strive to combat poor housing conditions and criminality in the [PRS](#), the establishment of a dedicated unit becomes a crucial step. To operate effectively, the CLU should adopt a zero-tolerance approach to criminality committed by landlords or letting/managing agents. All deadlines need to be strictly observed and enforced.

Drawing on lessons learned from early experiences by local authorities, this section aims to provide some insights of value for other local authorities considering similar initiatives. From the importance of building strong partnerships and managing expectations to ensuring confidentiality and staff well-being, the lessons outlined here offer a roadmap for creating a successful and sustainable criminal landlord unit that delivers positive outcomes for both tenants and communities.

1 People and teamwork

- **Right people:** ensure you have the right individuals with the right mindset. Be proactive in offering support and be realistic about what can be achieved
- **Joint work:** recognise that you cannot do it alone – collaborate with others
- **Dedicated focus:** for maximum effect, the team must be committed and focused. Providing more information to partners like the police results in better outcomes for everyone involved.

2 Partnerships and collaboration

- **Initially driven by individuals:** partnerships are usually initiated by motivated individuals, but after they have been established the work should eventually become part of routine everyday business involving key partners
- **Win-win approach:** When there are suspicions or concerns about a landlord or managing agent, the approach should benefit everyone involved. Many bad landlords are connected to criminality, and if you are interested in them, chances are that so are other organisations. All partners can benefit
- **Strong partnerships:** take opportunities to build partnerships and recognise that successful partnerships are crucial. Regular communication and collaboration are essential to avoid issues
- **Sharing:** ensure all intelligence and data identified are communicated and shared and that all parties are aware of data sharing legislation that allows them to do this. What might not seem important to you now, might be to someone else later. Agree the best way to do this and which systems to record information on.

3 Expectations

- **Manage expectations:** be clear about what can be achieved within the available resources and timelines. Communicate this to everyone involved to prevent misunderstandings
- **Be flexible:** recognise that you are still learning and that your approach must remain adaptable as you gain more experience.

4 Confidentiality and security

- **Trust and confidentiality:** it is crucial to build trust with your partners. Limit information to those who need it, ensuring that everything shared will be processed securely
- **Secure information:** use secure communication tools: (e.g. restricted online database access) and be mindful of physical office security as well.

5 Understand the bigger picture

- **Facilitators matter:** It is not just about the landlords – managing agents, solicitors and accountants may be complicit and are often key players in the process. These individuals may often return to the same networks or practices
- **Follow the money:** pay attention to financial connections and sources to identify potential criminal activity linked to poor landlords.

6 Political and sector support

- **Political backing:** keep councillors and MPs informed of outcomes rather than the details
- **Involve the sector:** getting support from other landlords who want to improve the sector's reputation can also be valuable.

7 Staff wellbeing and training

- **Training and support:** ensure staff receive proper training to handle the complexities of criminal landlord cases. Many may not be aware of the full scope of issues they may encounter until they are involved
- **Looking after staff:** prioritise the wellbeing of your team, as dealing with these cases can be emotionally and mentally challenging.

8 Communication and intelligence

- **Build networks:** effective communication and the sharing of intelligence are key to strengthening the unit's impact. Networks and partnerships will evolve with time
- **Raise awareness:** make sure the wider public is aware of your service. Effective communication will help you build trust and reach more individuals in need.

9 Perseverance and adaptation

- **Do not give up:** stay persistent and do not take no for an answer. Often, informal channels can be as effective as formal processes in securing results.

10 Growing and engaging network

- **Engage regularly:** strong, regular collaboration with key partners is essential. The effort to grow and engage networks is ongoing and must be sustained for long-term success.

The establishment of a criminal landlord unit is a complex but vital endeavour for local authorities committed to improving housing conditions and tackling exploitation within the PRS. The lessons shared here highlight the importance of collaboration, clear communication and ongoing flexibility as the unit evolves. By focusing on building strong partnerships, managing resources effectively and ensuring the wellbeing of staff, local authorities can create an environment that encourages both accountability

and positive change. Although challenges will undoubtedly arise, the success of criminal landlord units lies in the persistence, adaptability and commitment of the staff who run them.

H: Additional resources

H1: News articles

Set out below is a collection of news items from the past few years up to the time of publication of the toolkit. These offer insight into the prevalence and nature of criminality in the [PRS](#). The list consists of news items that have been reported in the more detailed papers on the most commonly occurring crimes in PRS housing. It also includes additional reports and covers a broader range of criminal activity.

Illegal drugs and the private rented sector

- [Landlord working abroad targeted by fake letting agent in London](#)
- [Police warn landlords about the need for regular property checks](#)
- [Crime gangs targeting empty high streets for cannabis production](#)
- [Four arrested in connection to cannabis production across Leeds](#)
- [Tenant jailed for cannabis farm in three-bed house in Exeter](#)
- [Photos of a fire ravaged house that had been used as a cannabis factory](#)
- [Three men sentence in £4.5m Leeds cannabis farm investigation](#)
- [Gangsters offer bounty to help target rivals involved in cannabis production in PRS](#)

Modern slavery and human trafficking

- [Dawn raid on slavery HMO](#)
- [Landmark court order against landlord turning a blind eye](#)
- [Landlord admits modern slavery charges](#)
- [Landlady ordered to compensate victim](#)
- [Landlord guilty of modern-day slavery offences](#)
- [Trafficking gang jailed for slavery offences](#)
- [Sex for rent to be dealt with by human trafficking legislation](#)
- [Trafficking women for sexual exploitation](#)
- [Landlords urged to be vigilant of criminal gangs renting to house modern slavery](#)
- [First slavery and trafficking risk order granted against landlord](#)
- [Sexual exploitation and brothels](#)
- [Man sentenced to jail for running brothel from his home](#)
- [Brothel discovered on quiet suburban street](#)

- [Two convicted for operating sophisticated brothel operation from third-party rented home](#)
- [Gang found guilty of trafficking young women to work in Swindon brothels](#)
- [Pensioner sentenced for allowing home to be used as a brothel](#)
- [Gangsters turn woman's luxury home into a pop-up brothel](#)
- [Pop up brothels being set up in holiday homes police warn](#)
- [Landlord jailed in first 'sex for rent' case in UK](#)

Housing fraud and financial exploitation

- [Facebook fraudster rented out other people's homes in 'cruel' scam](#)
- [Left homeless after rental scam](#)
- [Evicted in £20,000 rent scam](#)
- [Referencing tenancy fraud spikes 140% in a year](#)
- [Prospective tenants lose millions through rental scams](#)
- [Influencer lets rented property to fund lifestyle without landlords knowledge](#)
- [Letting agents defraud tenants and landlords](#)
- [Landlords convicted of defrauding DWP after potential financial exploitation of tenants uncovered](#)
- [Fine for landlord guilty of exploiting tenants by committing consumer protection offences](#)

Rent-to-rent scams

- [The dark world of rent-to-rent scams](#)
- [Evicted and lost £20,000 in a rental scam](#)
- [Trio of landlord scam victims come forward](#)
- [Landlord catches Influencer tenant renting out her rental home](#)
- [Rent-to-rent, the latest property get-rich-quick scheme](#)

Cuckooing

- [Crackdown on cuckooing in Bath](#)
- [Criminals took woman's house and turned it into drug den in Dundee](#)
- [New operation launched in Swindon to protect people against cuckooing](#)
- [Three arrested and drugs seized amid cuckooing concerns in Bishop's Stortford](#)
- [Newcastle programme tackling cuckooing, 'home takeover' and 'home invasion'](#)
- [Partial closure order for property to help victim of cuckooing](#)

- [Surrey based charity says cuckooing is on the rise throughout the county](#)
- [Closure order placed on Rhyl property suspected of cuckooing](#)
- [Drug dealers jailed after cuckooing vulnerable man's home](#)
- [Drug dealer jailed after cuckooing vulnerable woman's home in Tamworth](#)
- [Police raid homes over cuckooing fears in Sheffield](#)

Other types of criminality associated with the PRS

- [Landlord with a history of harassment convicted after violent hammer attack on tenant](#)
- [Financial, physical and emotional abuse in the shadow rental sector](#)
- [First landlord issued with a criminal behaviour order for causing harassment, alarm and distress to tenants](#)
- [Study shows Airbnb rentals 'drive up' crime rates](#)
- [Landlords left without rent after agent is convicted of vicious assault](#)

H2: Relevant legislation

Laws

[Anti-social Behaviour Act 2003](#)

[Anti-social Behaviour, Crime and Policing Act 2014](#)

[Building Act 1984](#)

[Children Act 1989](#)

[Children Act 2004](#)

[Children and Social Work Act 2017](#)

[Clean Neighbourhoods and Environment Act 2005](#)

[Consumer Credit Act 1974](#)

[Consumer Protection from Unfair Trading Regulations 2008](#)

[Consumer Rights Act 2015](#)

[Crime and Disorder Act 1998](#)

[Criminal Damage Act 1971](#)

[Criminal Finances Act 2017](#)

[Criminal Justice and Police Act 2001](#)

[Criminal Justice and Public Order Act 1994 \(c33\), Parts 5, 7 and 12](#)

[Criminal Procedure and Investigations Act 1996 \(CPIA\) and associated code](#)

[Defective Premises Act 1972 \(c35\)](#)

[Deregulation Act 2015](#)

[Electricity Act 1989](#)

[Energy Act 2011](#)

[Energy Act 2013](#)

[Enterprise and Regulatory Reform Act 2013 \(s83, 84 and 85\)](#)

[Environmental Protection Act 1990](#)

[Financial Services and Markets Act 2000 \(FSMA\)](#)

[Fraud Act 2006](#)

[Gangmasters \(Licensing\) Act 2004 \(GLA 2004\)](#)

[Health Act 2006, c28, Part 1](#)

[Health and Safety at Work etc Act 1974](#)

[Homelessness Act 2002](#)

[Homes \(Fitness for Human Habitation\) Act 2018](#)

[Housing Act 1985](#)

[Housing Act 1988](#)

[Housing Act 1996](#)

[Housing Act 2004](#)

[Housing \(Grants, Construction and Regeneration\) Act 1996](#)

[Housing and Planning 2016](#)

[Human Rights Act 1988](#)

[Immigration Act 2016](#)

[Immigration and Asylum Act 1999](#)

[Land Compensation Act 1973](#)

[Landlord and Tenant Act 1985](#)

[Law of Property Act 1925](#)

[Litter Act 1983 \(c35\)](#)

[Local Government and Housing Act 1989](#)

[Misuse of Drugs Act 1971](#)

[Modern Slavery Act 2015](#)

[The Money Laundering, Terrorist Financing and Transfer of Funds \(Information on the Payer\) Regulations 2017](#)

[Nationality and Borders Act 2022](#)

[Noise and Statutory Nuisance Act 1993](#)

[Police and Criminal Evidence Act 1984 \(PACE\) and associated codes](#)

[Prevention of Damage by Pests Act 1949 \(c55\)](#)

[Proceeds of Crime Act 2002 \(POCA\)](#)

[Protection from Eviction Act 1977](#)

[Psychoactive Substances Act 2016](#)

[Public Health Act 1936](#)

[Public Health Act 1961](#)

[Regulation of Investigatory Powers Act 2000 \(RIPA\)](#)

[Regulatory Enforcement and Sanctions Act 2008 \(RES\)](#)

[Renters' Rights Bill 2024-25 – still under Parliamentary consideration](#)

[Serious Crime Act 2007](#)

[Serious Crime Act 2015](#)

[Serious Organised Crime and Police Act 2005 \(SOCPA\)](#)

[Sexual Offences Act 1956](#)

[Sexual Offences Act 2003](#)

[Tenant Fees Act 2019](#)

[Terrorism Act 2000](#)

[Theft Act 1968](#)

[Town and Country Planning Act 1990 \(ss215, 219, 224 and 225\)](#)

Regulations and Orders

[Consumer Protection \(Amendment\) Regulations 2014](#)

[Co-ordination of Regulatory Enforcement \(Enforcement Action\) Order 2009](#)

[Co-ordination of Regulatory Enforcement \(Procedure for References to LBRO\) Order 2009](#)

[Criminal Finances Act 2017 \(Commencement No. 2 and Transitional Provisions\) Regulations 2017](#)

[Electrical Safety Standards in the Private Rented Sector \(England\) Regulations 2020](#)

[Energy Efficiency \(Private Rented Property\) \(England and Wales\) Regulations 2015](#)

[Enterprise Act 2002 \(Part 8 Domestic Infringements\) Order 2003](#)

[Fire Safety \(England\) Regulations 2022](#)

[Gas Safety \(Installation and Use\) \(Amendment\) Regulations 2018](#)

[Homelessness \(Review Procedure etc\) Regulations 2018](#)

[Housing \(Interim Management Orders\) \(Prescribed Circumstances\) \(England\) Order 2006](#)

[Housing Act 2004 \(Commencement No. 5 and Transitional Provisions and Savings\) \(England\) Order 2006](#)

[Housing Health and Safety Rating System \(England\) Regulations 2006](#)

[Housing \(Interim Management Orders\) \(Prescribed Circumstances\) \(England\) Order 2006](#)

[Legislative and Regulatory Reform \(Regulatory Functions\) Order 2007](#)

[Licensing and Management of Houses in Multiple Occupation \(Additional Provisions\) \(England\) Regulations 2007](#)

[Licensing and Management of Houses in Multiple Occupation and Other Houses \(Miscellaneous Provisions\) \(England\) Regulations 2006](#)

[Licensing of Houses in Multiple Occupation \(Prescribed Description\) \(England\) Order 2006](#)

[Licensing of Houses in Multiple Occupation \(Mandatory Conditions of Licences\) \(England\) Regulations 2018](#)

[Local Authorities \(Functions and Responsibilities\) \(England\) Regulations 2000](#)

[Management of Houses in Multiple Occupation \(England\) Regulations 2006](#)

[Money Laundering and Terrorist Financing \(Amendment\) \(No.2\) Regulations 2022](#)

[Prevention of Social Housing Fraud \(Power to Require Information\) \(England\) Regulations 2014](#)

[Redress Scheme for Letting Agency Work and Property Management Work \(Requirement to Belong to a Scheme etc\) \(England\) Order 2014](#)

[Regulatory Reform \(Housing Assistance\) \(England and Wales\) Order 2002](#)

[Rent Repayment Orders \(Housing and Planning Act 2016\) \(Amount of Penalty\) Regulations 2017](#)

[Selective Licensing of Houses \(Additional Conditions\) \(England\) Order 2015](#)

[Smoke and Carbon Monoxide Alarm \(England\) Regulations 2015](#)

[Smoke and Carbon Monoxide Alarm \(Amendment\) Regulations 2022](#)

Appendices

Subletting in rent-to-rent scenarios

Ben Reeve-Lewis, Safer Renting

15 June 2025

Introduction

Rent-to-rent (R2R) is not illegal as a business practice. The illegality occurs from what the people who are behind the running of the letting do with the property and occupiers. For the most part these people know what they are doing. They know what action and attention they are trying to avoid and will usually deny knowledge of the subletting. They will commonly try to argue that legally a subtenancy cannot exist on a number of angles.

These notes are an examination of the various legal points involved. As with all such matters, not everyone would agree with every point raised. Some areas are decidedly grey and even contradictory – which is not surprising given the complexity of the subject and the efforts gone to by R2R operators to further confuse and confound.

Despite the length and detail of these notes, it should be understood that the legal principles surrounding subletting are far more complex and arcane. The aim of these notes is to try and provide some clarity on how subletting works in common R2R arrangements specifically.

The principles covered are sound as of the date at the head of this piece, but at the time of writing there are certain clauses in the Renters' Rights Bill that have so far passed over from the previous Renters (Reform) Bill that may have an impact on the R2R business model and at least one Upper Tribunal case yet to be decided on a couple of significant factors. Also, case law changes regularly and should be closely monitored. Where appropriate I shall point out areas of contention.

I use the term 'sublessee' to include tenancies and licences, which are both capable of existing as a sublease. Where the term 'subtenant' is used, this is a deliberate reference to a tenancy rather than a licence. Be aware that these notes presume an existing and high level of knowledge of the principles of the creation of tenancies and licences.

1 The creation of a sublease

- 1.1 It is important to grasp that the rules for the creation of tenancies and licences are valid when applied to R2R set-ups.
- 1.2 If the conditions of the letting to the sublessee are sufficient to constitute a full tenancy, then a tenancy it will be, regardless of the label the R2R operator chooses to put on a contract.
- 1.3 '*The manufacture of a five pronged implement for manual digging results in a fork, even if the manufacturer, unfamiliar with the English language, insists he has made a spade.*'³⁶

³⁶ Comments of Templeman HJ in Street v Mountford (1986)

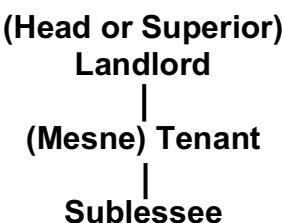
- 1.4 In the same way, if the person creating the subletting lives in the accommodation and shares some of that accommodation with the sublessee, then that letting will be an excluded licence, or lodger arrangement, in the same way as if the property were not let under an R2R arrangement.³⁷
- 1.5 Many people presume that a sublessee has no rights in occupation. This is a serious error to be avoided. A sublessee has the right to have their repairs addressed and is protected from harassment and illegal eviction in the normal way.
- 1.6 Similarly a landlord, who may be a tenant themselves, is still tied by usual obligations to their renter, dependent on the type of letting.

2 The reporting line where the intermediate landlord is a tenant

- 2.1 In a normal letting arrangement, the relationship is simple enough.



- 2.2 If the landlord wants their tenant to leave they will need to serve notice and then obtain a possession order from the court. The landlord is obliged to keep in repair the structure of the building.³⁸
- 2.3 If the tenant wants to end their tenancy they must either 'terminate' the tenancy by serving notice to quit on the landlord or 'surrender' the tenancy with the acceptance of the landlord.
- 2.4 Where there is a sublease in place we need to be aware of certain name changes.



- 2.5 The original tenant, in becoming landlord to the sublessee, is identified as the 'mesne tenant'.
- 2.6 Once a tenancy is in place it can only be ended by termination, surrender or an order of a court. Where a mesne tenant is not in occupation this does not automatically mean that the tenancy, as an entity, has ended.
- 2.7 Even death does not end a tenancy. It can be passed down to others through survivorship and succession.
- 2.8 In an R2R arrangement where the mesne tenant has sublet the whole and not in occupation themselves, the superior landlord may well claim the tenancy has

³⁷ s3A(2)(a) Protection from Eviction Act 1977

³⁸ s11 Landlord and Tenant Act 1985

ended and therefore the sublessees are trespassers but this is usually not the case at all.

- 2.9 'A tenancy under which a dwelling-house in England is let as a separate dwelling is for the purposes of this Act an assured tenancy if and so long as –
(a) the tenant or, as the case may be, each of the joint tenants is an individual; and
(b) the tenant or, as the case may be, at least one of the joint tenants **occupies the dwelling-house as his only or principal home.**'³⁹

- 2.10 So a person who entered as an assured tenant but who is no longer satisfying s1(b) by ceasing to occupy the property as their sole or principal home, merely means that they are no longer an assured tenant. It will instead convert into a tenancy at common law, unless a case can be made that the property has truly been abandoned, which is far from easy for the superior landlord, especially in instances where there are sublessees *in situ*.

- 2.11 The Housing Act 1988 goes further on the matter:-

- 2.12 '(1) Subsection (2) applies if, in breach of an express or implied term of the tenancy, a tenant of a dwelling-house let under an assured tenancy to which this section applies –
(a) parts with possession of the dwelling-house, or
(b) sublets the whole of the dwelling-house (or sublets first part of it and then the remainder)
(c) The tenancy ceases to be an assured tenancy and cannot subsequently become an assured tenancy.'⁴⁰

- 2.13 It is important to note that subsection 'c' tells us that once the assured tenant vacates in order to sublet, even if they move back in they do not regain assured status.

- 2.14 This is very important for superior landlords seeking possession against their tenant, because in no longer holding an assured tenancy, even if they later move back in, the possession procedure is different, in that the superior landlord cannot use s21 or s8 notices but must first serve a standard notice to quit.

- 2.15 It is possible to mount a defence where a superior landlord has used assured tenancy notices in these cases. Such a defence may buy more time for any sublessees.

3 Assured tenancies given by owners to property management companies

- 3.1 It is surprisingly common to see letting agents/property management companies holding assured shorthold tenancies with the owner.
- 3.2 Such contracts are entirely inappropriate for the same reasons given above, that an assured tenancy is only in force where the person holding it 'occupies the dwelling house as his sole or principal home'. A company cannot by

³⁹ s1 Housing Act 1988

⁴⁰ s15A Housing Act 1988

definition, occupy residential premises as a home, so such agreements are merely shams that misrepresent the true position.

- 3.3 Property management companies can occupy premises as a business and all tenancy matters are then governed by the Landlord and Tenant Act 1954.
- 3.4 These inappropriate contracts do not have any effect on any sublessees in occupation.

4 **Contractual restrictions in relation to the creation of subleases**

- 4.1 It is usual for superior landlords to complain that they did not give their permission for a sublease to be created, sometimes even where the superior landlord's contract is with a property management company, which begs the question: 'What did you think they were going to do with it?'
- 4.2 Many standard tenancy agreements contain routine clauses prohibiting subletting but where a sublease has been created by the mesne tenant, this simply means that they have breached the terms of their own contract with the superior landlord; it does not mean that the sublease cannot exist.

5 **Statutory restrictions in relation to the creation of subleases**

- 5.1 There are provisions within the Housing Act 1988 relating to subletting, but there are certain anomalies that seem quite contentious.
- 5.2 *(1) Subject to subsection (3) below, it shall be an implied term of every assured tenancy which is a periodic tenancy that, except with the consent of the landlord, the tenant shall not –*
 - (a) assign the tenancy (in whole or in part); or*
 - (b) sublet or part with possession of the whole or any part of the dwelling-house let on the tenancy.*⁴¹
- 5.3 S15(1) above refers to the term 'periodic tenancy' which for the purposes of Part 1 of the Housing Act 1988 is defined in the following terms, in deliberate opposition to a fixed-term tenancy:-
 - (1) In this Part of this Act, except where the context otherwise requires, – 'fixed-term tenancy' means any tenancy other than a periodic tenancy ...*⁴²
- 5.5 The fact that periodic tenancies are specifically defined in opposition to fixed-term tenancies suggests it was Parliament's intention to exclude the latter from the scope of the section. The anomaly here is that the term that subletting is not permitted except with the landlord's consent is not implied into fixed-term tenancies, suggesting that the law as drafted indicates that it is not unlawful to sublet during the fixed term, only once the fixed term expires, giving rise to a periodic tenancy.⁴³
- 5.6 The Renters' Rights Bill abolishes fixed term tenancies⁴⁴ so all PRS tenancies will be periodic from the outset, which in turn mitigates the anomaly of s15 not

⁴¹ s15 Housing Act 1988

⁴² s45 Housing Act 1988

⁴³ s5 Housing Act 1988

⁴⁴ s2 Renters' Rights Bill

applying at the commencement of a tenancy but only when it later becomes periodic, so in most senses this simplifies the law.

- 5.7. However, whilst s15 of the Housing Act states “*The tenant shall not –*
- (a) *assign the tenancy (in whole or in part); or*
 - (b) *sublet or part with possession of the whole or any part of the dwelling-house let on the tenancy”*

This is not to say that when a person is in breach of s15 that a subtenancy cannot have been created, merely that the tenant has committed a statutory breach. If the subletting fulfils the requirements of a tenancy in its own right, then the occupier will hold a tenancy with their landlord, who is the mesne tenant in breach.

- 5.8. As with Bruton tenancies (see s8 below) a tenancy will exist at contract between the occupier and the mesne tenant whilst not providing an interest in land for the occupier, nor any legal relationship with the superior landlord, unless waiver has taken place (see s13 below).

6 **Mesne tenant telling subtenants they have to leave**

- 6.1 Where it is contended that the mesne tenant was prohibited from subletting, it is common for the mesne tenant (who is the sublessees' landlord) to tell the occupiers that there is no tenancy and they must leave the accommodation, but this misrepresents the situation as we saw in 4.1.
- 6.2 If we can accept that a subtenancy is a tenancy in the same way as a standard tenancy then the subtenant is protected from illegal eviction in the normal way:
- 6.3 ‘*Where any premises have been let as a dwelling under a tenancy which is neither a statutorily protected tenancy nor an excluded tenancy and –*
- (a) *the tenancy (in this section referred to as the former tenancy) has come to an end, but*
 - (b) *the occupier continues to reside in the premises or part of them, it shall not be lawful for the owner to enforce against the occupier, otherwise than by proceedings in the court, his right to recover possession of the premises.*⁴⁵

- 6.4 The mesne tenant, keen to avoid trouble with the superior landlord, must still follow due process and is not allowed to take advantage of his own wrong to escape his obligations to the subtenant.⁴⁶

7 **Superior landlord telling the subtenants they have to leave**

- 7.1 While the mesne tenancy is extant there is no legal relationship between the subtenants and the superior landlord who cannot demand rent be paid to him or that the subtenants are required to do something that is not within his power to do, such as increase the rent.

⁴⁵ s3 Protection from Eviction Act 1977

⁴⁶ Critchley v Clifford (1962)

- 7.2 The superior landlord is obliged by law to seek possession against the mesne tenant through the courts. Effectively, the continued existence of the mesne tenancy acts as a buffer between the sublessees and the superior landlord and will remain so until either the landlord obtains a possession order or the mesne tenant terminates or surrenders their own tenancy.

8 Power to create a subtenancy – ‘Bruton tenancies’

- 8.1 ‘Bruton tenancies’ is not a formal legal term, merely a convenience for identifying a certain type of arrangement based on a previous court of appeal case.⁴⁷
- 8.2 The property in question was owned by London Borough Lambeth which granted a licence to London & Quadrant Housing Trust (LQHT), which installed Mr Bruton as the occupier. He applied to sue LQHT, as his landlords, for breaching their repairing obligation under s11 Landlord and Tenant Act 1985.
- 8.3 LQHT argued that they were not landlords, on the basis that they only held a licence from LB Lambeth themselves and therefore could not grant a tenancy under their own lease, citing the legal principle *‘nemo dat quod non habet’* (no one can give what they do not have).
- 8.4 This line of argument was rejected by the courts. A Bruton tenancy can be understood as creating the contractual relationship of landlord and tenant without binding the head landlord because whilst a tenancy, it does not confer a leasehold estate, so is effectively a hybrid form of tenancy.⁴⁸
- 8.5 In setting out the decision, Lord Hoffman commented:-
- 8.6 *‘In my opinion, the Trust plainly did purport to grant a tenancy. It entered into an agreement on terms which constituted a tenancy. It may have agreed with Mr Bruton to say that it was not a tenancy. But the parties cannot contract out of the Rent Acts or other landlord and tenant statutes by such devices. Nor in my view can they be used by a landlord to avoid being estopped from denying that he entered into the agreement he actually made. For these reasons I would allow the appeal and declare that Mr Bruton was a tenant.’*
- He went on:-
- 8.7 *‘LQHT’s lack of legal title was also irrelevant because the character of the agreement, not the nature of the landlord, was the key point for deciding whether a lease existed – the character of the landlord is irrelevant because although the Rent Acts and other Landlord and Tenant Acts do make distinctions between different kinds of landlords, it is not by saying that what would be a tenancy if granted by one landlord will be something else if granted by another.’*
- 8.8 the legal concept of Bruton tenancies has the effect of creating a contractual tenancy between the 2 parties without creating any title to land that might give the sub-lessees any legal interest in it and does not bind the sub-lessee and the superior landlord unless waiver has taken place (see s13 below)

⁴⁷ Bruton v London & Quadrant Housing Trust (2000)

⁴⁸ Kay v Lambeth LB (2006)

9 Is the sublease authorised by the head landlord or unauthorised?

- 9.1 Having dispensed with arguments over the right or power of a mesne tenant to create a sublease, the next important question is whether that sublease was authorised or unauthorised by the superior landlord, because this distinction affects both the security of tenure of the sublessees and the required possession proceedings for the landlord.
- 9.2 The lawfulness of a subtenancy is assessed at the point of the determination of the mesne tenancy, whether through termination by the mesne tenant or the granting of a possession order by the court.⁴⁹

10 Where the sublet is genuinely unauthorised

- 10.1 Whilst there is a legal relationship of landlord and tenant between the sublessees and the mesne tenant, there is no legal or contractual relationship between the sublessees and the superior landlord.
- 10.2 If the mesne tenant terminates their own tenancy by giving notice to the superior landlord then when the notice expires any subtenants become trespassers in terms of their relationship to the superior landlord and he can treat accordingly. If the mesne tenancy is lawfully ended (excluding by surrender), the lawful subtenancy is also ended without the need for a notice to quit.⁵⁰
- 10.3 If the superior landlord wants vacant possession, they need to serve notice on the mesne tenant and proceed to court in the usual way.
- 10.4 Once the mesne tenancy has ended (by either termination or possession order – not surrender (see section 12)), the subtenant, being a trespasser, can then be peacefully evicted without a court order. However, landlords should be wary of eviction getting out of hand and leading to accusations of using undue force.
- 10.5 **NB:** there is no need for the superior landlord to name the subtenants in the possession proceedings where the sublet is unauthorised.
- 10.6 If the subtenants want to defend the possession action for whatever reasons (perhaps they can prove that the sublet is actually authorised), then they have to fill in a form N244 and apply to be joined in the proceedings, which will then allow them to present a case in defence to the court in their own right. However, in becoming joined they do open themselves up to a possible costs risk which would not be there if they remained outside of the proceedings.

11 Where the sublet is genuinely authorised

- 11.1 As with unauthorised sublets, whilst the mesne tenancy is extant there is no legal or contractual relationship between the superior landlord and the sublessees, but if the mesne tenant terminates their own tenancy with the head landlord by giving formal notice, when that notice expires there will be a legal relationship between the superior landlord and the sublessees, who from the date of termination will now be the superior landlord's direct tenants, under the same terms as the original letting.

⁴⁹ Jessamine Investment Co v Schwartz (1978)

⁵⁰ Moore Properties (Ilford) Ltd v McKeon (1976)

11.2 The possession procedure also changes for authorised sublets, in that the landlord must first serve notice on the mesne tenant alone. After expiry of that notice the superior landlord must then serve notice on the subtenants and only after that expires will he be able to apply for possession against all parties.⁵¹ This will obviously lengthen the possession procedure.

12 Where the mesne tenant surrenders their tenancy

12.1 Express surrender is where both landlord and tenant mutually agree to end the letting. More commonly though you see 'implied surrender', for which there are two requirements:-

- an unequivocal act of surrender on the part of the tenant and also
- an unequivocal act of acceptance of surrender on the part of the landlord.

12.2 A tenant pushing their keys through the landlord's letterbox is merely an act of surrender, in which case the tenancy has not been surrendered unless there is an accompanying act on the part of the landlord confirming they have accepted the surrender.

12.3 It has been held that redecorating and advertising a property for re-letting is not unequivocal proof of acceptance of surrender and as a result the tenant, having believed they had ended their tenancy, can find themselves in substantial rent arrears.⁵²

12.4 Unlike termination, where surrender has taken place, it does not matter if the sublet was authorised or unauthorised.

12.5 The fact that surrender has taken place means that any subtenants in the property will automatically become the direct tenants of the head landlord. This applies even where the superior landlord knew nothing of the sublet at all.⁵³

12.6 All rights and obligations transfer.

12.7 Persons advising or advocating for subtenants in R2R arrangements should make clear that if their landlord (the mesne tenant) surrenders their own tenancy, they will, from that moment on, be a tenant of the superior landlord.

12.8 **NB:** It is important to be clear about the difference between termination and surrender. This rule does not apply where a mesne tenant gives a notice to quit to the head landlord.⁵⁴ However, as discussed above, if the subtenant is an assured shorthold tenant, they may nevertheless become the head landlord's direct tenant by virtue of section 18 of the Housing Act 1988.

12.9 '*If at any time –*

- (a) *a dwelling-house is for the time being lawfully let on an assured tenancy, and*
- (b) *the landlord under the assured tenancy is himself a tenant under a superior tenancy; and*
- (c) *the superior tenancy comes to an end,*

⁵¹ See Barrow v Kazim (2018)

⁵² Padwick Properties v Punj Lloyd Ltd (2016)

⁵³ Parker v Jones (1910) and Basingstoke & Deane Borough Council v Paice (1995)

⁵⁴ Pennel v Payne (1995)

*then, subject to subsection (2) below, the assured tenancy shall continue in existence as a tenancy held of the person whose interest would, apart from the continuance of the assured tenancy, entitle him to actual possession of the dwelling-house at that time.*⁵⁵

13 Can an unauthorised sublet become authorised later on?

- 13.1 Yes it can, where 'waiver' has been identified.
- 13.2 Waiver occurs where a superior landlord continues to accept rent from the mesne tenant after they knew about the subletting. They can be said to have 'waived their right to sue for a breach of covenant'.
- 13.3 A superior landlord, faced with a breach has two choices: to seek possession on the basis of that breach or to elect to continue with the letting, thus accepting and absorbing the breach, as we see in the comments in the below case:-
- 13.4 '*The plaintiffs, being deemed to have known that Mr Scarth had ceased to be in occupation and that Miss Cordery had come into occupation, had the right, when they acquired the deemed knowledge, to elect between two courses: they could elect to allow Miss Cordery to continue in her occupation – an occupation that had come into being as a result of a breach of covenant by Mr Scarth – or they could take steps by legal proceedings, if Miss Cordery refused to move out, to have it determined that she was not a lawful subtenant within section 137 of the Rent Act 1977. By their continuing acceptance of rent from Mr Scarth (while Miss Cordery, in her continuing ignorance of the true position, continued to pay rent to Mr Scarth under the purported subtenancy), they elected, or must be deemed to have elected, not to take steps to have her removed, but, on the other hand, to accept her occupation.*⁵⁶
- 13.5 Such a rule seems difficult to reconcile with the head landlord's legal entitlement to receive rent from the mesne tenant up until the date the mesne tenancy has ended. However, acceptance of rent prior to this point is not necessarily incompatible with an intention to terminate the mesne tenancy.⁵⁷ This difficulty is alleviated by the distinction drawn in case law between whether such an acceptance of rent is qualified or unqualified, ie whether the head landlord specifies that his acceptance of the rent is without prejudice to his right to terminate the mesne tenancy.⁵⁸
- 13.6 Where the head landlord accepts such rent without qualification, this conduct is treated as an unequivocal choice to continue with the mesne tenancy along with the subtenancy.
- 13.7 Knowledge of the breach by the superior landlords agent is also deemed to be waiver – see Metropolitan Properties below – and this also applies if the agent continues to take the rent in contravention of the superior landlord's stated instructions.⁵⁹ Also, where rent is paid directly into a landlord's bank account, it

⁵⁵ s18(1) Housing Act 1988

⁵⁶ Metropolitan Properties Co Ltd v Cordery (1980) comment of Megaw LJ

⁵⁷ Oak Property Company Ltd v Chapman and another

⁵⁸ Carter v Green (1950)

⁵⁹ Central Estates (Belgravia) v Woolgar (No.2) (1972)

is accepted (even if he instructed the bank not to receive it) if he takes no steps to repay it to the tenant.⁶⁰

- 13.8 For the head landlord to have waived the breach of covenant for the purposes of forfeiture, the landlord must do some unequivocal act recognising the continued existence of the lease which is communicated to the tenant.⁶¹
- 13.9 '*If the [superior] landlord by word or deed manifests to the [mesne] tenant by an unequivocal act a concluded decision to elect in a particular manner, he will be bound by such an election. If he chooses to do something such as demanding or receiving rent which can only be done consistently with the existence of a certain state of affairs, viz. the continued existence of the lease or tenancy in operation, he cannot thereafter be heard to say that that state of affairs did not then exist.*'⁶²
- 13.10 There will be other situations where the superior landlord could be said to have recognised the existence of the sublease, such as demanding entry to inspect or repair. The list is not restricted simply to demanding rent.

14 **Involuntary assignment**

- 14.1 This is a very contentious issue, which when dealing with R2R scam companies has the potential to seriously disrupt the applecart.
- 14.2 Where a tenant attempts to grant a sublease for a term greater than or equal to the term he has himself, this will operate as an involuntary assignment (by operation of law) of the mesne tenant's interest to the subtenant ie, the mesne tenant drops out of the picture and there is a direct landlord-tenant relationship between the head landlord and subtenant on the terms of the headlease.⁶³
- 14.3 '*In accordance with a very old and established rule, [actually Hicks v Dowling (1696)] where a lessee, by a document in the form of a sublease, divests himself of everything that he has got (which he must necessarily do if he is transferring to his so-called sublessee an estate as great as, or purporting to be greater than, his own) he from that moment is a stranger to the land, in the sense that the relationship of landlord and tenant, in respect of tenure, cannot any longer exist between him and the so-called sublessee.*'⁶⁴
- 14.4 The facts in Milmo were these: the intermediate lessor entered into a written agreement for a sublease of longer term than his headlease. Once the sublease had expired, the intermediate lessor served a notice to quit on the sublessee and when that was ignored, took possession proceedings. The claim failed on the basis that the sublease took effect as an assignment of the headlease. Accordingly, the intermediate lessor could no longer rely on the contractual provision permitting determination of the sublease by notice.
- 14.5 The suggestion there that the assignment must be in the form of a document was commented upon in the same case where Lord Greene referred to a

60 Person v Harvey (1885)

61 Matthews v Smallwood (1910) and Cornillie v Saha (1996)

62 Comments of Buckley LJ in Central Estates (Belgravia) v Woolgar (1972)

63 Milmo v Carreras (1946)

64 Comment of Lord Greene MR Milmo v Carreras (1946)

tenancy in equity as being similarly affected and in a later case it was held that involuntary assignment could also take place even with an oral sublease.⁶⁵

- 14.6 To clarify, if a tenant has a 12-month tenancy and a week after moving in creates a subtenancy of 12 months, then that subtenancy will be one week longer than the mesne tenant's own tenancy and therefore, to quote Lord Greene, '*He from that moment is a stranger to the land in the sense that the relationship of landlord and tenant, in respect of tenure, cannot any longer exist between him and the so-called sublessee.*'
- 14.7 This is also the case if the mesne tenant grants a sublease of 11 months and three weeks, in order to compensate, because the sublease is not longer than his own but is still equal to it, which is also enough to qualify it. *Ergo*, a shorter sublease would not fall foul of involuntary assignment.

15 Involuntary assignment and fixed-term v periodic tenancies

- 15.1 Clearly for assignment to take place it relies on identifying the period of both the intermediary and the sublessee's contractual period.
- 15.2 If a mesne tenant's own tenancy is already out of time and continues as a periodic tenancy, then involuntary assignment will not have taken place, because the periodic tenancy could potentially carry on indefinitely, so such a comparison of fixed time could not be drawn.⁶⁶

16 Contradictions and anomalies

- 16.1 There is a body of case law throughout the commonwealth, not just the UK, surrounding survival of intermediate contractual provisions despite the acceptance of the Milmo principle of the mesne tenant becoming 'a stranger to the land'.
- 16.2 Whilst the rental liability transfers to the sublessees paying the head landlord, in cases where the sublessee gets into rent arrears it can be argued that this is a breach of contract between the sublessee and his liabilities under contract, to the mesne tenant, despite assignment having taken place, because contractual provisions, it again could be argued, survive the assignment, leaving the sublessee owing both landlords at once.⁶⁷
- 16.3 However, other cases on a similar point have not always agreed.
- 16.4 Similarly, in a case where a sublessor was prohibited by contract from opening a pub on the premises without permission of the mesne tenant, who applied for right of entry to remedy the contractual breach but was refused because of the 'stranger to the land' principle.⁶⁸
- 16.5 However, this position changed some years later, the courts commenting:-
- 16.6. '*As to whether relief from forfeiture could be made available in cases of wilful breach it was found that, whilst the circumstances in which it would be*

65 Parc Battersea v Hutchison (1999)

66 Oxley v James (1938)

67 Baker v Gosling (1888)

68 D'oe d Freeman v Bateman (1818)

*appropriate to grant relief would be rare, the fact that forfeiture proceedings were initiated by deliberate breach of covenant was not, of itself, fatal to the case of a covenantee.'*⁶⁹

- 16.7 So whilst Milmo and the concept of involuntary assignment is well-established law, the possible exceptions involve levels of legal interpretation beyond the day-to-day work of officers in regulatory services but should nonetheless be borne in mind.
- 16.8 It does not demand too much of the imagination to see how a professional R2R operator might react being told that they had in fact involuntarily assigned their interest in the property to the superior landlord and are not entitled to receive rent from the subtenant.
- 16.9. It needs to be noted that with the Renters' Rights Bill abolishing fixed term tenancies it may not in future be possible for involuntary assignment to take place because there will be no contractual mechanism on terms to use as comparators.

Conclusion

Rent-to-rent is a massive part of the private rented sector. For officers in regulatory services of all kinds, exploitation of this business model by dubious operators creates huge problems and adds onerous procedures in investigation trying to unravel the legal positions of the parties.

For renters seeking various forms of redress, it is just as difficult.

Establishing who is who in such R2R arrangements is fiendishly complex and really more the preserve of barristers and the higher courts, but in practice this is not possible and lay people, however knowledgeable and experienced, still have to analyse and act based on an understanding of the positions of the parties in a realm that is deliberately fogged with confusion and misinformation.

What I have tried to do in these notes, however, is provide some framework for understanding, even if sometimes decisions are contradictory and questions remain unanswered.

If such cases reach the higher courts then this is entirely appropriate, even if the original analysis proves not to be correct but in working it on a day-to-day, frontline basis, where you cannot pick up a phone and call a barrister for an on-the-spot counsel's opinion, it is important to be able to grasp the salient principles, many of which are completely sound and logical, despite the arcane nature of some of the arguments.

I hope that these notes will at the very least arm the frontline officer with a certain confidence when arguing with R2R operators who try to obfuscate and divert.

⁶⁹ Shiloh Spinners Ltd v Harding (1973)

Different types of engagement with partners

Engagement between organisations can take various forms, ranging from informal collaborations to structured, long-term partnerships. The level of commitment, interaction and integration varies depending on the nature of the engagement. Understanding these distinctions is crucial for selecting the most effective approach to achieving shared goals.

Figure 7 outlines four key types of engagement: awareness, cooperation, collaboration and partnership. Each type differs in its level of structure, communication and commitment, influencing how stakeholders interact and work towards common objectives. From flexible and informal awareness campaigns to highly structured partnerships, these models provide a framework for fostering effective cooperation across different sectors.

Figure 7 – Evolution of partnerships⁷⁰



Awareness: awareness engagement aims to inform individuals or organisations about specific topics, issues, products or initiatives. These arrangements primarily focus on sharing information and working towards a common objective, but they remain loosely structured with flexible roles. Characterised by informal relationships, minimal decision making and limited communication, such engagements may sometimes lack stability. However, this informality also provides key advantages, offering greater flexibility and adaptability by freeing participants from rigid structures and bureaucratic constraints.

Cooperation: cooperation involves a higher level of interaction among members than awareness initiatives, as parties come together with a shared purpose while maintaining their independence. It requires individuals or groups to work closely, exchanging resources and information, but without fully integrating their efforts as seen in collaboration. Compared to awareness engagements, cooperation is more structured and enduring, often involving basic agreements, regular communication and scheduled meetings to facilitate ongoing coordination.

⁷⁰ J.E. Goldstraw-White, M. Gill and M. Button, *Enhancing police resources in the fight against economic crime cost effectively: harnessing the potential of the private and not-for-profit sectors* PRCI & CCEC: Tunbridge Wells & Portsmouth, 2024

Collaboration: collaborative engagement involves individuals or groups working together towards a specific common goal, with a strong emphasis on exchanging ideas, skills and resources. It can take place within teams, across departments or between organisations, fostering a sense of shared ownership and collective responsibility for outcomes. Successful collaboration relies on effective communication, teamwork and coordination. Compared to cooperation, collaboration is built on a more robust foundation, requiring deeper commitment and a higher degree of integration among participants.

Partnership: partnership engagement represents a formal, long-term commitment between entities working together to deliver shared functions or objectives. Partnerships can take various forms, including strategic alliances, joint ventures, co-development projects and even mergers, with the goal of leveraging each party's strengths and resources for mutual benefit. These arrangements require clearly defined roles, responsibilities and agreements, along with a high level of trust, transparency and collaboration to ensure sustained success.

Energy theft: spot the signs



Energy theft

Spot the signs

British Gas Cracks Down on Energy Theft: Spot the Signs

Energy theft is a growing concern in Britain, costing honest customers over £1.4 billion annually. This translates to more than £50 per year for each paying customer. British Gas is committed to tackling this issue, ensuring customer safety and keeping bills low.

The Scale of the Problem

Energy theft is estimated to occur in up to 1 in every 150 homes each year. This illegal activity not only impacts finances but also poses significant safety risks.

Detecting and Deterring Theft

Revenue Protection Officers (RPOs) play a crucial role in detecting and deterring energy theft at both domestic and commercial premises. When theft is detected, the supply is made safe, responsibility is established, and an assessment is created for the theft of gas or abstraction of electricity. RPOs provide written statements to the police and encourage the Crown Prosecution Service to prosecute all offenders. In cases of multiple offences, supplies may be disconnected, including at street level.

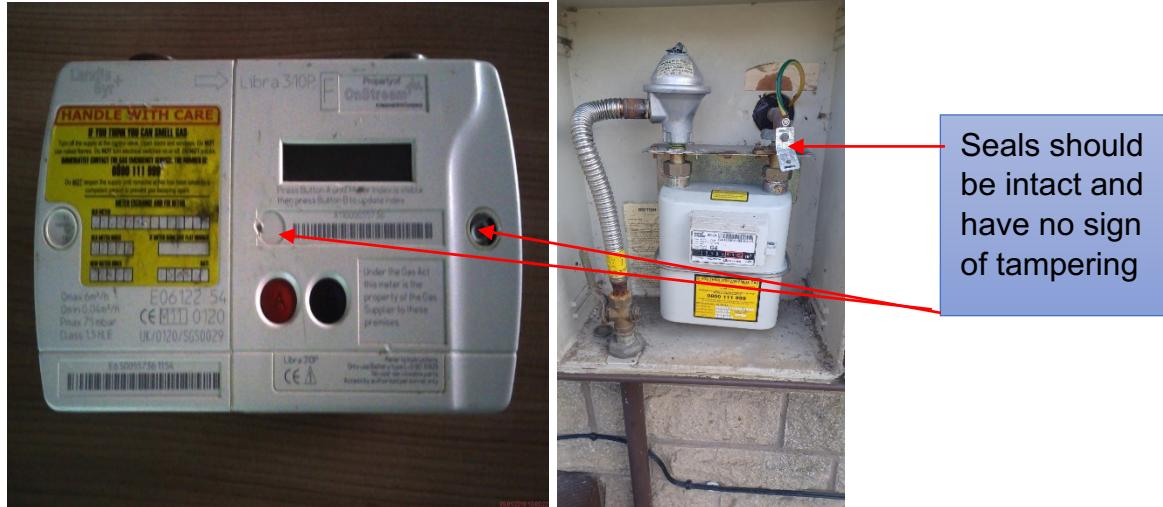
RPOs have assist the Police and Local authorities by delivering training to enable professionals to recognise some of the signs where tampering and theft is occurring. Below is a glimpse of the issues Utility companies are dealing with including the consequences.

Spot the Signs: Identifying Gas Meter Tampering to Ensure Safety and Compliance

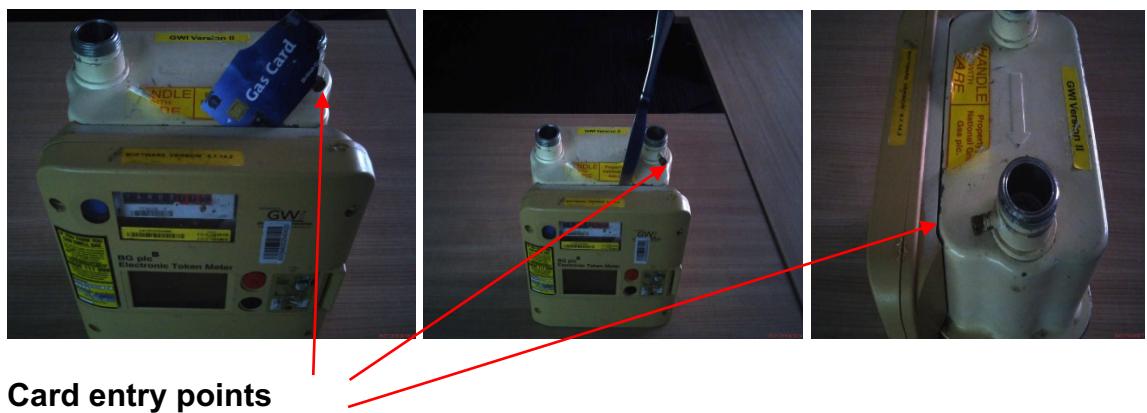
In a bid to combat the rising issue of meter tampering, experts have released a comprehensive guide to help individuals and professionals identify signs of tampering with gas and electric meters. Meter tampering not only leads to illegal usage of utilities but also poses significant safety risks. This guide aims to educate the professionals on how to spot various types of tampering and understand their implications.

Gas Prepayment Meters

Missing Seals One of the first signs of tampering is missing seals on gas prepayment meters. Top seals should always be present, and their absence may indicate tampering. Similarly, battery cover seals might be missing due to failure to replace them after routine battery replacement. Damaged seals suggest attempts to remove the meter facia, potentially to access index tumblers or tamper with the closure valve.



Card Tamper Tampering with the meter's internal valve closure pin can prevent it from engaging, allowing unauthorized gas usage. Signs of card tampering include objects inserted between the meter body and module, scoring or marking on the meter body or module, and puncture holes in the meter module casing.



Call Help A prepayment meter displaying *Call Help* but still allowing gas usage may have been interfered with internally, obstructing the internal closure valve.



Valve Tamper Signs of valve tampering include meters passing gas without payment, excessively marked meter unions, and loose or moveable valves inside. This is generally for the experts.

Substitute Meters Substitute meters, often bought or stolen with the intention to steal gas, can be identified by different Meter Serial Numbers (MSN), scratched or marked brass meter unions, and unusual customer reactions during visits. Other indicators include loose official meters, refused or delayed access to property, noise and vibrations at the stand pipe, and the smell of gas.

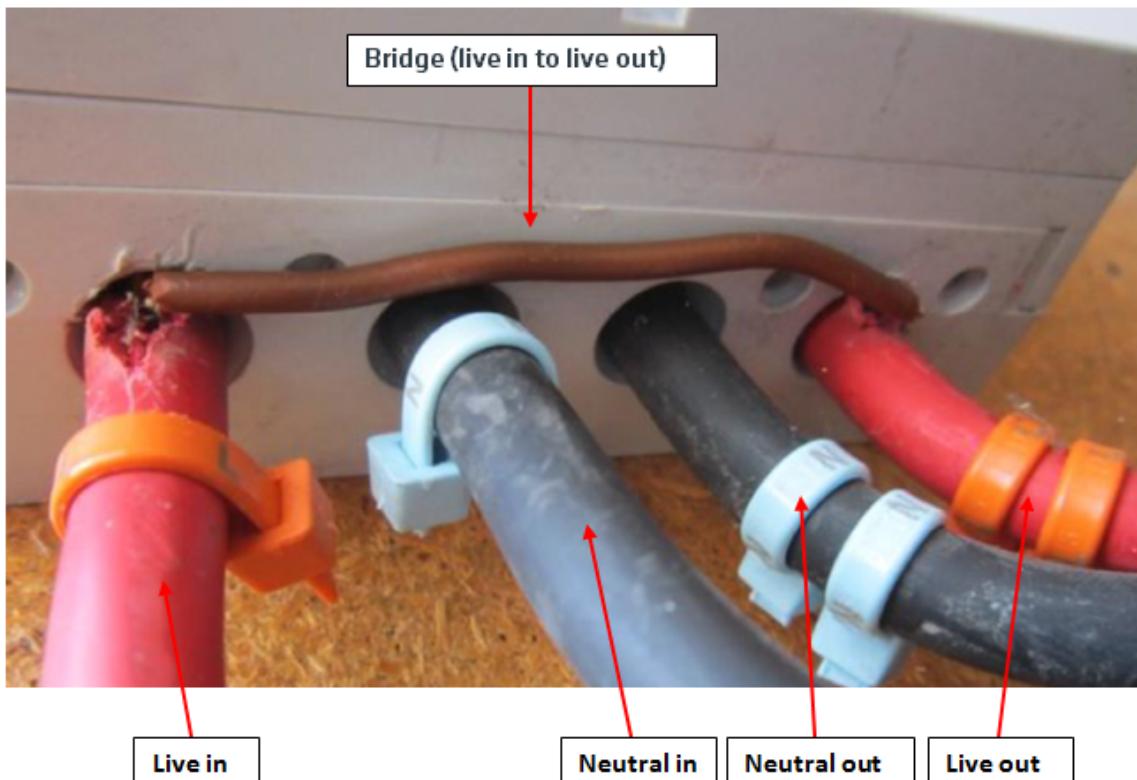
Reversed Meters Reversing the meter can significantly reduce recorded gas usage. Signs include the meter facing the opposite direction, the meter governor fitted to the outlet side, the meter test dial moving anticlockwise, scratched or marked brass meter unions, paint or scratches on the index compartment, and marks on the wall behind the meter.

Bridged Supplies Using non-official items to connect the inlet to the outlet can be extremely dangerous. Signs of bridged supplies include the absence of a meter governor and an unregulated supply, which increases the risk of carbon monoxide poisoning.

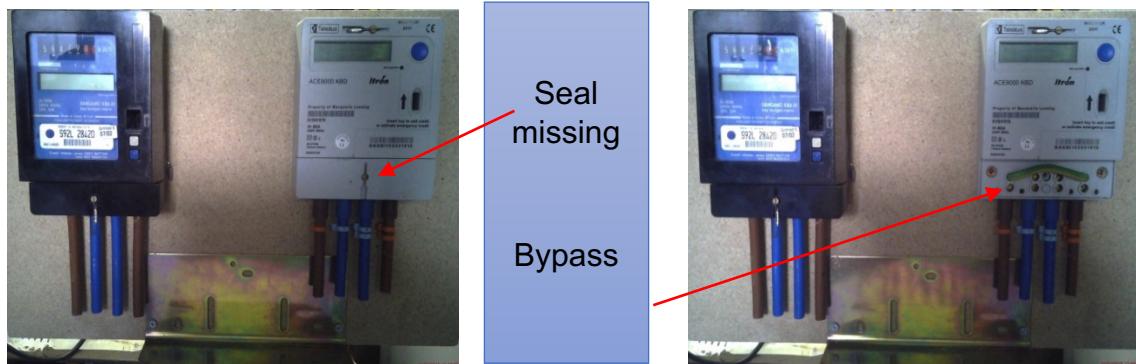


Spot the signs: Identifying Electric Meter tampering and bypass

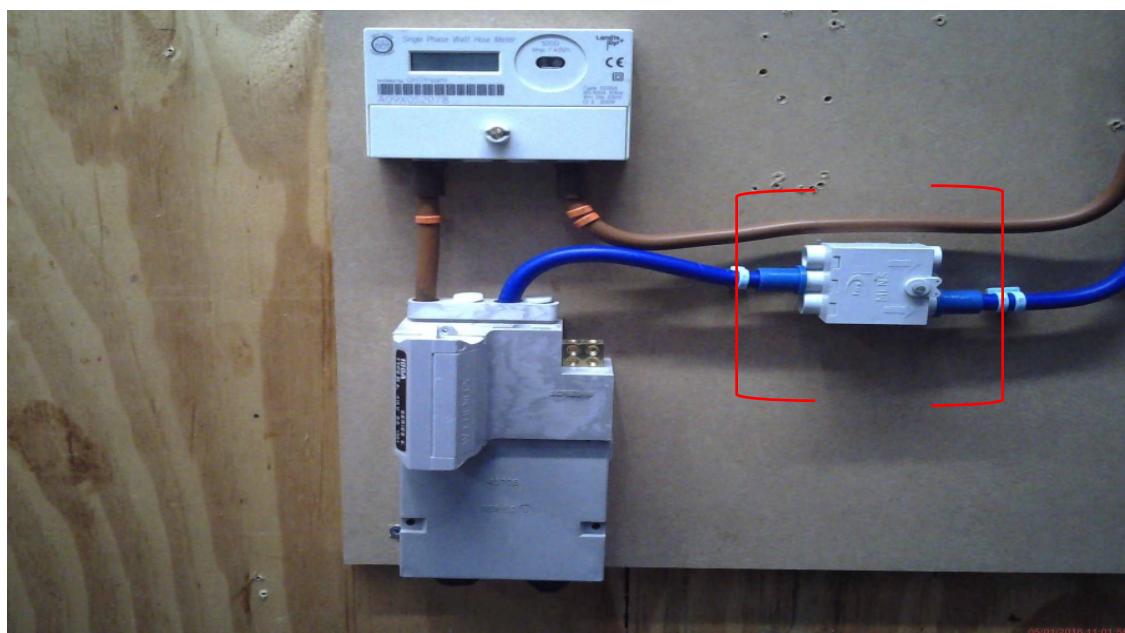
Exposed Bridge/Loop Tampering with electric meters often involves creating an exposed bridge or loop. Signs include burn marks on tails or terminals, missing seals on the terminal cover, and loose tails.



Missing Terminal Seal (Concealed Bridge/Loop) This tamper involves cutting the terminal cover seal and placing a wire between the incoming and outgoing live cables. Signs include missing or cut seals, scratching around the terminal cover screw, and electric usage despite the meter showing debt.



Dropped Tails Dropped tails involve disconnecting the live or neutral tails from the meter, stopping it from recording usage. Signs include burn marks on tails or terminals, missing or damaged terminal covers, loose tails, and blank displays.



Reversed Tails Reversing the meter tails can stop the meter from recording or make it run backwards. Signs include burn marks on tails or terminals, missing seals on the terminal cover, loose tails, and unchanged meter readings.

Direct to Mains Connecting a device from below the cut-out to the live out on the meter or consumer unit allows electricity to be used without being recorded. Signs include burn marks on tails or terminals, missing seals on the terminal cover, loose tails, and blank displays.

Electrical equipment. Meters and consumer boards all vary.

If in any doubt call the utility provider or supplier as an emergency.

The Consequences

Energy theft has real consequences, affecting those who tamper and innocent bystanders. British Gas urges customers to report any suspicious activity to help combat this issue.

The consequences of energy theft are real and each year it affects those who tamper and even those who are innocent bystanders.



Conclusion

Identifying signs of tampering is crucial for ensuring safety and legal compliance. This article provides essential information to help spot potential issues and take appropriate action. By staying vigilant and informed, individuals and professionals can help prevent the dangers associated with meter tampering.

Glossary

Accredited financial investigator (AFI): a specialist law enforcement officer or investigator who is trained and authorised to use powers granted by the Proceeds of Crime Act 2002 (POCA) to investigate, trace and recover assets obtained through criminal activities.

Additional licensing: a local authority scheme that requires certain private landlords to obtain a licence to rent out their properties, usually to improve housing standards in specific areas or types of housing beyond the scope of mandatory licensing.

Anti-social behaviour (ASB): defined by the Anti-social Behaviour, Crime and Policing Act 2014 as *behaviour causing harassment, alarm, or distress to persons not of the same household*. Where anti-social behaviour has occurred in a housing context, consideration should be given to whether the conduct can cause nuisance or annoyance to a person in relation to that person's occupation of residential premises or whether the conduct can cause housing-related nuisance or annoyance to any person.

Arms dealing: the illicit trade of firearms, explosives and ammunition.

Arrears: an outstanding debt or unpaid rent that is overdue.

Asset recovery incentive scheme (ARIS): a government initiative that allows law enforcement agencies and local authorities to retain a portion of the assets recovered through the Proceeds of Crime Act 2002 (POCA). The funds are reinvested to support further enforcement activities and strengthen crime prevention efforts.

Assured shorthold tenancy (AST): a legally binding contract between a landlord and a tenant for the rental of a property – the most common type of rental agreement in England and Wales. The way they operate is set to change under the forthcoming Renters' Rights Act.

Banning order: an order from a First-tier Tribunal that prevents landlords or managing agents from operating within the PRS as a result of having been convicted of any offence described in the Housing and Planning Act 2016 (Banning Order Offences)

Black market rentals refer to rental properties that are offered illegally or without proper authorisation, often in violation of housing laws or regulations.

Breach: activities which break housing laws and regulations (such as safety hazards, overcrowding and licensing violations).

Brothel: generally understood to be a place where two or more people offer sexual services for payment.

Cannabis farm: a part or whole of a property that has been repurposed to produce cannabis.

Civil penalties: financial penalties imposed by a government agency or council as a restitution for wrongdoing – they are often used as an alternative to criminal prosecution and are designed to encourage compliance without the need for a court case.

Clear, Hold, Build is a framework for tackling organised crime, gang activity and persistent anti-social behaviour by reclaiming and rebuilding communities affected and by restoring the relationship between residents, the police and statutory agencies.

Closure order: a legal order that shuts down a property as a consequence of serious nuisance, disorder or criminal activity – commonly used by police or local authorities to deal with problems like drug dealing, anti-social behaviour or illegal activities in a property.

Coercion: an activity that persuades someone to do something via force or threats.

Competent authorities: public bodies or organisations designated to enforce laws, oversee compliance or perform regulatory duties within specific legal frameworks.

Compliance: adhering to laws, regulations, standards, rules or guidelines set by an authority.

Confiscation order: a legal order issued by a court under [POCA](#) legislation, requiring a person to forfeit assets (including property) obtained through unlawful means.

Corruption: dishonest or illegal actions including bribery or fraud – and including landlords 'turning a blind eye' to these.

County lines: a drug trafficking method where gangs from urban areas expand their operations into smaller towns and rural areas, often using vulnerable people, including children, to transport and sell drugs.

Criminal exploitation: the act of coercing, manipulating or taking advantage of someone to engage in illegal activities, often for the benefit of another person or group.

Cuckooing: a form of exploitation where criminals take over a vulnerable person's home, often without consent, to use it for illegal activities like drug dealing.

Debt bondage (also called debt slavery): a form of modern slavery where a person is forced to work to repay a debt, often under unfair or exploitative conditions.

Deposit protection scheme (DPS): a legal requirement for landlords to place tenants' deposits in a government-approved scheme that protects tenants' deposits and ensures they are returned at the end of the tenancy, provided there are no disputes.

Disrepair: the condition of a property that is not maintained to an acceptable standard, potentially causing health and safety issues.

Drug cultivation: the growing or manufacturing of a controlled substance (illegal drug).

Drug den: a property used as a base from where controlled substances (illegal drugs) are sold.

Drug distribution: the movement of controlled substances (illegal drugs) across locations in order to facilitate their sale.

Drug storing: the use of a property as a base for controlled substances (illegal drugs) to be held in order to facilitate distribution and/or sale.

Drug trafficking: the production, distribution and sale of controlled substances (illegal drugs).

Energy performance certificate (EPC): a certificate that rates the energy efficiency of a property, required whenever a property is built, sold or rented. Properties are graded from A (most efficient) to G (least efficient).

Enforcement notice: a notice issued by a local authority requiring compliance with housing standards and regulations.

Environmental crime: illegal activities that harm the environment, such as fly-tipping, pollution, and waste dumping.

Eviction: the legal process by which a landlord can remove a tenant from their property, usually as a consequence of non-compliance with the tenancy agreement.

Extortion: the act of forcing individuals or businesses to pay money or provide favours under threat.

Fake letting agencies: fraudulent businesses that pose as legitimate property rental agencies but engage in deceptive practices.

‘Farmers’ (cannabis farmers): individuals who tend to the cannabis plants – themselves often the victims of modern slavery.

Financial exploitation: the act of taking advantage of individuals (tenants or lettings agent clients) for financial gain through unfair, deceptive or abusive practices.

Fine: a financial penalty imposed on landlords or property managers for violating housing laws or regulations.

Fitness for human habitation: the legal standard that requires a rental property to be safe and suitable for people to live in and free from serious defects, as per the Homes (Fitness for Human Habitation) Act 2018.

Fixed penalty notice (FPN): a fine that can be issued to landlords, tenants or others for breaches of regulations, often used as a quicker alternative to prosecution.

Fixed-term tenancy: a tenancy that lasts for a specified period.

Forced labour: where an individual is compelled to work against their will through manipulation, coercion or outright force, often in arduous conditions.

Forgery and falsification of documents: the illegal act of creating, altering or using documents with the intent to deceive or defraud. This includes creating fake agreements, falsifying tenant references and tampering with official records.

Fraud: any dishonest or illegal activity intended to deceive or gain something

Gangmaster: someone who recruits, supervises and controls workers, often for illegal or exploitative labour.

Gas safety certificate: a document that confirms gas appliances in a property have been checked by a qualified engineer and are safe to use

Government Agency Intelligence Network (GAIN): a collaborative platform that allows government agencies and public sector organisations to share intelligence and information related to criminal activity, fraud and other illegal behaviour.

Grow: refers to cannabis cultivation.

Grower: cannabis cultivator.

Guarantor: a person who agrees to pay the rent if the tenant fails to do so.

Handling stolen goods: the illegal act of buying, selling, receiving or being in possession of items that were obtained through theft.

Harassment: actions or behaviour that create an intimidating or hostile environment. For tenants, this might include a landlord entering the property without consent, using threats or abuse, raising rent unfairly, evicting without reason or cutting off utilities to force them out.

House in multiple occupation (HMO): a property which is let to three or more people from different households who live and share facilities. The full definition and exclusions can be found in the Housing Act 2004, section 254-264 and Schedule 14.

Housing enforcement officer: local authority professionals responsible for ensuring that landlords and property owners comply with housing laws and regulations.

Housing Health and Safety Rating System (HHSRS): a risk-based system used to assess the health and safety conditions of a residential property.

HMO (additional licensing): a discretionary scheme adopted by local authorities to help deal with the problems associated with HMOs that are not already covered by mandatory licensing

HMO (mandatory licensing): a legal requirement for landlords to obtain a licence to rent out an HMO in which there are five or more people from two or more separate households residing and sharing facilities.

Housing Ombudsman: independent service that resolves disputes between tenants and landlords or managing/letting agents in the private rented sector.

Housing stock: refers to the total supply of available residential properties in a specific area, including both owned and rented properties.

Health and Safety Executive (HSE): a regulatory body responsible for ensuring that health and safety standards are met.

Human trafficking: (also called people trafficking) the illegal trade of humans for the purpose of forced labour, sexual exploitation or other forms of abuse. It involves recruiting, transporting or harbouring individuals through force, fraud or coercion.

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 affecting consumers and businesses.

Identity fraud is using another person's stolen identity to obtain goods or services by deception, for financial gain.

Identity theft: is when personal information or possessions are stolen to use the person's identity.

Illegal eviction: the unlawful removal of a tenant from a property by the landlord or an appointed person, without following the proper legal procedures.

Illegal money lending: lending money without the proper legal authorisation, often at excessive interest rates or with unfair terms. This practice is typically associated with [loan sharks](#) (see [loan sharking](#))

Illegal subletting: when a tenant or letting agent/property manager lets out all or part of the rental property to someone else, where this is against the terms of the tenancy and/or without the knowledge/consent of the landlord.

Information sharing agreement (ISA): an agreement between different parties/organisations to facilitate the sharing of data and ensure compliance with data protection obligations.

Improvement notice: a notice issued by local authorities requiring landlords to carry out repairs or improvements to meet health and safety standards.

Insurance fraud: the act of deliberately providing false information or making dishonest claims to an insurance company to receive a payout or reduce premiums.

Inventory: a detailed list of the property's contents and their condition, typically created at the start and end of the tenancy.

Landlord: a person or entity that owns and rents out property to tenants in exchange for regular payments (rent).

Letting agent: a person or company responsible (on behalf of the landlord) for making the arrangements needed for a tenant to rent a property. They may also take on the subsequent responsibility of managing the property throughout the tenancy (on behalf of the landlord).

Loan sharking: the illegal practice of lending money at exorbitant interest rates, often under harsh and exploitative conditions. Loan sharks typically use threats or violence and coerce borrowers into agreeing to terms they cannot afford.

Lodger: a person who rents a room or part of a property, typically from the owner (landlord) who also lives in the property.

A management order allows a local authority to take control of a property to ensure its proper maintenance and management, where a landlord has failed to comply with licensing or housing regulations and the property has been mismanaged or left in a hazardous condition.

Mediation: a process where an independent third party helps landlords and tenants resolve disputes without going to court.

Memorandum of understanding is a type of agreement between two or more parties. It is distinct from a data sharing agreement in that it is broader (ie, not limited to data sharing) and non-legally binding, and outlines general intentions and principles of cooperation.

Metrics: measurements for assessing or tracking the performance of a specific activity, such as measuring the success of enforcement actions taken by the local authority.

Ministry of Housing, Communities and Local Government: the ministerial department of government currently responsible for housing and the private rented sector (2025).

Modern slavery: the severe exploitation of individuals by others for personal or commercial gain. Its victims are controlled, coerced or deceived into conditions from which they cannot escape, resulting in the loss of their freedom. (See also: [human trafficking](#); [debt bondage](#); [forced labour](#); [sexual exploitation](#); [criminal exploitation](#); [spiritual and ritualistic abuse](#)).

Money laundering: the process of concealing the origins of illegally obtained money to make it appear as if the funds come from legitimate sources.

The National Referral Mechanism (NRM) is the UK's official framework for identifying and supporting victims of modern slavery and human trafficking. It is

designed to ensure that victims receive appropriate protection and support. First responders can refer individuals to the NRM. These include: police, local authorities, UK Border Force, and [NGOs](#). For further details or to make a report see [the government web pages on modern slavery](#).

Organised crime: criminal activities carried out by groups that plan and execute illegal actions for profit or power. These groups are typically well-structured and hierarchical, and engage in a variety of criminal activities.

Organised crime group (OCG): a group of individuals who work together in a coordinated and structured way to engage in illegal activities for profit, power or control.

Organised crime network indicates involvement in multiple types of criminal activity, potentially spanning a number of locations and countries.

Periodic tenancy: a tenancy agreement that continues on a rolling basis, typically month to month, after the initial fixed-term period ends.

Person having control: the person entitled to receive rental income from a property. They are ultimately responsible for ensuring that all legal duties are met (even if those duties are delegated to a letting agent or property manager), as per section 263 of the Housing Act 2004.

Person managing: someone who manages a property and ensures compliance with regulations as per section 263 of the Housing Act 2004. This may be the owner/landlord or it may be someone acting on behalf of the landlord (e.g. a letting agent or property manager).

Pop-up brothel: temporary, often short-term rented property used for illegal sex work. These operations frequently move between different rental properties to avoid detection by authorities.

Possession order: a court order that allows a landlord to regain possession of their property from a tenant.

Private rented sector (PRS): consists of privately owned properties that are rented out to tenants by individual landlords, companies or managing/letting agents, rather than social housing provided by the government or housing associations.

Proceeds of crime application: an application under the Proceeds of Crime Act (POCA) 2002 for confiscation of assets in serious cases with the purpose of recovering the financial benefit that the offender has obtained from their criminal conduct.

Prohibition order: an order that prevents someone from doing something or restricts the use of a property. These can be issued for several reasons, including a breach of regulations or issues relating to safety or misconduct

Property inspection: visits by enforcement teams to assess the condition of a property, ensuring it meets legal standards and complies with health, safety and housing regulations.

Property manager: an individual or organisation that handles the long-term management of a property during a tenancy.

Protection racket: an illegal operation where individuals or groups extort money from businesses or individuals in exchange for offering 'protection' from harm, theft or other potential threats (fabricated or otherwise).

Regional asset recovery team (RART): specialist police units in the UK that focus on recovering the proceeds of crime. They are made up of officers from various law enforcement agencies, including the police, HM Revenue and Customs (HMRC), the National Crime Agency (NCA) and other partner organisations like the Crown Prosecution Service (CPS).

Rent repayment order (RRO): an order requiring a landlord to repay rent to a tenant if the landlord has committed certain offences, such as failing to license a property.

Rental fraud: deceiving potential tenants into paying a fee for a property that does not exist or is otherwise not available (e.g. already rented out to others or the person purporting to arrange the rental does not have the authority to do so).

Rent-to-rent (R2R): a form of subletting undertaken with the knowledge and agreement of the owner of the property and where such subletting does not contravene licensing requirements.

Rent-to-rent scam: where additional subletting of a property is carried out for financial gain, without the knowledge and agreement of the owner and/or where an overcrowded, unlicensed HMO is created.

Right to entry: the landlord's legal right to enter the property for specific reasons (such as repairs), usually with proper notice to the tenant.

Right to rent: legislation requiring landlords to check the immigration status of tenants to ensure they have the right to rent property in the UK.

Rogue Landlord and Agent Database: accessible only by local and central government bodies, it records landlords and agents with serious offences, such as banning orders or numerous financial penalties.

Scam: a dishonest scheme designed to deceive people, usually for financial gain.

Section 8 notice: a legal eviction process established by the Housing Act 1988. It allows landlords to evict tenants before the tenancy ends if they breach the agreement.

Section 21 notice: legal process in the UK established by the Housing Act 1988. It allows landlords to evict tenants without giving a reason, once the fixed term of the

tenancy has ended. The Renters' Rights Bill proposes to abolish these and strengthen grounds for section 8.

Security deposit: a sum of money held by the landlord as protection against damages or unpaid rent, refundable at the end of the tenancy.

Selective licensing: a discretionary licensing scheme under Part 3 of the Housing Act 2004, requiring landlords to obtain a licence from the local authority to rent out their properties in designated areas.

Serious crime typically refers to criminal activities that cause significant harm to individuals, society or the state. These include organised crime and associated criminal activities. The Serious Crime Act 2015 provides a legal definition.

Service charge: additional fees paid by the tenant for services provided by the landlord, such as maintenance of communal areas.

Sex for rent is when a landlord exploits a tenant by demanding or coercing sexual favours as an alternative to rental payments.

Sexual exploitation: the abuse of an individual through coercion, manipulation or deception to engage in sexual activities for the benefit or gain of others, often exploiting a power imbalances or vulnerabilities.

Social housing: housing provided by local authorities and housing associations.

Social landlord: a housing association, local authority (council) or other registered provider that offers affordable housing to tenants, typically at lower rents than the private market. They are responsible for managing social housing, maintaining properties and supporting tenants, often with government funding or regulation.

Spiritual and ritualistic abuse involves the misuse of spiritual or religious practices to control, manipulate or harm others.

Statutory nuisance refers to a condition or activity that negatively affects health, safety or the environment, and is prohibited under specific laws.

Subletting: when a tenant rents out part or all of their rented property to another person. Subletting is legal where this is permitted within the terms of the tenancy and/or with the knowledge/agreement of the landlord.

Tax evasion: the illegal act of deliberately avoiding paying taxes owed to the government, usually by underreporting income, hiding money or falsifying tax documents.

Taxing: in the context of criminal activity (particularly within drugs markets), refers to the act of stealing from rivals, often involving violence and high-value transactions. This practice is distinct from traditional robbery or theft. It frequently occurs in inter-criminal contexts, sometimes between individuals involved in the drugs trade.

Tenancy agreement: a contract between the landlord and tenant setting out the terms and conditions of the rental arrangement. It also outlines rights and responsibilities of both parties.

Tenancy deposit scheme (TDS): a government-backed scheme protecting tenants' deposits and resolving disputes over deposit returns.

Tenant: an individual who rents and occupies a property from a landlord.

Tenant association: a group formed by tenants within a building or housing complex to represent their collective interests.

Tenant exploitation: unfair or unethical treatment of tenants by landlords, property managers or others involved in the rental process.

Unexplained wealth order (UWO): a legal tool that allows enforcement agencies to require individuals or entities to explain the origin of assets that appear disproportionate to their known lawful income.

Unlicensed HMO refers to the operation of a property as an [HMO](#) without having obtained the requisite licence.

Workforce exploitation: unfair treatment of workers by employers, often for financial gain, including a range of unethical or illegal practices. In the context of trafficked people, it refers to the forced or coerced use of individuals for labour under abusive or illegal conditions.

Acronyms used in the toolkit

ABC	acceptable behaviour contract
AFI	accredited financial investigator
AML	anti-money laundering
ANPR	automatic number plate recognition
ARIS	Asset Recovery Incentivisation Scheme
ASA	Advertising Standards Authority
ASB	anti-social behaviour
BACS	Bankers' Automated Clearing System
CGA	Cannabis Grow Aware scheme
CDD	customer due diligence
CHB	Clear, Hold, Build
CLU	criminal landlord unit
CPS	Crown Prosecution Service
CSP	community safety partnership
DPA	Data Protection Act 2018
DoB	date of birth
DVLA	Driver and Vehicle Licensing Agency
DWP	Department for Work and Pensions
EPC	energy performance certificate
FCA	Financial Conduct Authority
FMO	final management order
FPN	fixed penalty notice
FRS	fire and rescue service
FSMA	Financial Services and Marketing Authority
GDPR	General Data Protection Regulation
GLA	Gangmasters (Licensing) Act 2004
GLAA	Gangmasters & Labour Abuse Authority
GMP	Greater Manchester Police
HHSRS	Housing Health and Safety Rating System
HMO	house in multiple occupation
HMRC	His Majesty's Revenue & Customs
ICE	Immigration Compliance and Enforcement
ICO	Information Commissioner's Office
IE	Immigration Enforcement
IMLT	illegal money lending team
IMO	interim management order
ISA	information sharing agreement
LoCTA	Local Authority Council Tax Association system
LGA	Local Government Association
LHA	local housing authority
MASH	multi-agency safeguarding hub
MHCLG	Ministry of Housing, Communities and Local Government
MoU	memorandum of understanding
MS	modern slavery
MSHTU	Modern slavery and human trafficking unit
NAFN	National Anti-Fraud Network
NCA	National Crime Agency

NGO	non-governmental organisation
NHS	National Health Service
NRLA	National Residential Landlords Association
NRM	National Referral Mechanism
OCG	organised crime group
OCU	organised crime unit
PEP	politically exposed person
PIN	personal identification number
PNC	Police National Computer
PND	Police National Database
POCA	the Proceeds of Crime Act 2002
PRS	private rented sector
RART	regional asset recovery team
RIPA	the Regulation of Investigatory Powers Act 2000
ROCU	regional organised crime unit
RLAD	Rogue Landlord and Agent Database
RRO	rent repayment order
s8	section 8, Housing Act 1988
s21	section 21, Housing Act 1988
SiD	Sanction Information Database
SARs	suspicious activity reports
SCPO	serious crime prevention order
SFO	Serious Fraud Office
SOC	serious organised crime
SOCPA	Serious Organised Crime and Police Act 2005
STPO	slavery and trafficking prevention order
STRO	slavery and trafficking risk order
TDS	tenancy deposit scheme
TPO	the Property Ombudsman
TS	Trading Standards
UWO	unexplained wealth order
WYP	West Yorkshire Police

About the toolkit

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