

# Review of Camden's Additional HMO Licensing scheme

**Designation date: December 2020 – December 2025**

**Date: October 2024**

## **1. Summary**

- 1.1. The council implemented a borough-wide licensing scheme for additional Houses in Multiple Occupation (HMOs) on 8 December 2020 for a period of five years. The purpose of the scheme was to improve the management and safety standards within these privately rented properties.
- 1.2. The council has a legal duty to undertake a review of this scheme, which it is doing so now, to determine whether its aims and objectives are being met, and to help inform the decision on whether to introduce a further 5-year scheme. This report brings together the data, feedback and wider considerations from the review process.
- 1.3. In summary, the review demonstrates that the existence of the scheme is resulting in improving standards within a large number of licensed HMOs. These improvements relate to a range of factors including fire safety precautions, amenity provision, controlling overcrowding, and the enforcement of a statutory minimum bedroom size, all resulting in improved safety standards and conditions for tenants within these privately rented properties.
- 1.4. There are however indications that there continue to be issues with non-compliance and poor management relating to a percentage of existing licenses, and there remain a number of properties which should have a license but are operating without one.
- 1.5. There is also evidence of a small number of individuals operating within the sector with a criminal or “rogue” element to them, but that the Council remains determined to deal with this group through robust action, and is making use of the full range of enforcement powers available; including prosecutions and banning orders, to drive the worst offenders out of the sector.

## **2. Introduction**

- 2.1. HMOs are defined in the Housing Act 2004 and include houses and flats occupied by three or more people forming more than one household, and who share a facility such as a kitchen or bathroom. These may typically be shared houses with all occupants on a joint tenancy agreement, or properties let on a room-by-room basis. HMOs can also be buildings which have been converted into self-contained flats which meet certain criteria, including whether the conversion met particular Building Regulations and whether the ratio of owner-occupied to tenanted flats is met.

- 2.2. The licensing of HMOs is acknowledged as being a long-term strategy to drive up conditions, by requiring certain standards to be met relating to matters such as fire safety precautions, the provision of extra cooking or washing facilities, tackling overcrowded conditions, and managing antisocial behaviour.
- 2.3. Licensing schemes are increasingly recognised by Local Authorities as an effective way of helping to regulate HMOs within their boroughs. As of October 2024, 22 of the 33 London boroughs now operate some form of additional HMO licensing scheme. This approach is also supported by the London Mayors Office which as a minimum, encourages Councils to consider licensing for all HMOs, since many of the worst issues in the privately rented sector are concentrated in such properties.
- 2.4. Camden Council has operated successive borough wide additional HMO licensing schemes since 2015, with the current five-year designation due to expire on 8<sup>th</sup> December 2025. The current scheme is being evaluated to determine whether its objective of improving standards is being met and will also be used to consider whether any service improvements could be made for the remainder of the scheme or for any future scheme.

### **3. Background**

#### ***Legislative context***

- 3.1. Part 2 of the Housing Act 2004 introduces HMO licensing but creates a two-tier approach to these privately rented properties: mandatory licensing for larger 'high risk' HMOs, and additional licensing schemes for smaller HMOs. Mandatory licensing operates within every Local Authority, and additional licensing schemes can be introduced where certain conditions are met.
- 3.2. This two-tier approach creates an anomaly for local authorities, as well as for landlords and tenants. Without an additional licensing scheme, those HMOs not subject to mandatory licensing are free to operate with no licence, and therefore the required checks completed by the local authority regarding the property condition and safety are not carried out as part of a licence inspection. Neither is the process of establishing what management arrangements are in place for the property, or whether the proposed licence holder is "fit and proper", meaning properties can end up being poorly managed, and potentially by someone with little or no legal interest in the property.
- 3.3. Under section 56(2) of the Housing Act 2004, Local Authorities can introduce additional HMO licensing schemes, where they "*consider that a significant proportion of the HMOs of that description are being managed sufficiently ineffectively as to give rise, or to be likely to give rise, to one or more particular problems either for those occupying the HMOs or for members of the public*".
- 3.4. Ineffective management can relate to a range of factors such as poor conditions within the accommodation which adversely affect the health, safety and welfare of the occupying tenants. It can also relate to poor standards of the facilities provided, or overcrowding. Residents in the wider community (or those living in areas where there is a high concentration of these properties) will also be aware that poor

management can result in such HMOs becoming a focal point for antisocial behaviour, noise and refuse problems.

3.5. The existence of the additional licensing scheme therefore allows the Council to hold HMO landlords and managing agents accountable, with greater regulatory oversight and controls for these properties. In Camden, the existing scheme requires all HMOs not subject to mandatory licensing, to be licenced, which includes:

- HMOs occupied by 3 or more persons who form more than 1 household (section 254 of the housing Act 2004),
- and certain buildings converted wholly into self-contained flats (Section 257 of the Housing Act 2004). Section 257 HMO are those where the conversion of the original building into flats does not meet the standards required by the 1991 Building Regulations (or those which were in force at the time of the conversion), and where less than two-thirds of the flats are owner-occupied.

**Note:** Guidance issued by the CLG has previously stated that buildings within this category should not be licensed where they are predominantly owner occupied. Therefore, Camden incorporated this principal into the current scheme and requires buildings to have less than 50% of flats as owner occupied, before requiring a licence.

#### ***Strategic context and other considerations***

3.6. When the current scheme started in December 2020 “Camden 2025” set out the Councils vision for the future of residents and businesses in the borough, and within a housing context identified the following ambitions:

- Whether renting or buying, homes should be affordable and secure
- Homes should be safe, warm and free from damp.
- Homes should be accessible and flexible to meet people’s needs, whether that is someone growing older or a growing family.
- Nobody should be sleeping on the streets.

3.7. The associated Camden Plan confirmed the Councils response to this vision, and acknowledged that too many people’s lives are blighted by poor housing conditions:

- We will make sure that everyone has a sustainable roof over their head or is on a pathway to achieving this, minimising homelessness and rough sleeping.
- We will strive to make homes in Camden safe, well-managed and well-maintained, and make sure that people’s homes meet their needs. We will play an active role in shaping a private rented sector that works.

3.8. In recent years, the Council has had to respond to external and unexpected factors including the continued cuts from central government funding, and the impacts of the pandemic. This led to the evolution of Camden 2025 into “We Make Camden”. This vision highlights Housing as one of the six key challenges the Council is facing with its mission for Camden being to have “...*enough decent, safe, warm and family-friendly housing to support our communities*”. The regulatory oversight an

additional licensing scheme brings, with its focus on improving safety standards and management of these homes within the private rented sector, clearly aligns with meeting this challenge.

### ***Housing needs and homelessness prevention***

- 3.9. Camden's current Homelessness and Rough Sleeping Strategy acknowledges the role the licensing scheme plays in reducing homelessness, in the way that such schemes can improve conditions without the tenant having to ask for improvements. PRS tenants, particularly those in less secure or temporary accommodation, can be afraid of 'retaliatory evictions' if requests for repairs or improved standards are made. But via the licensing scheme, improvements are identified via the inspection carried out by the Council, and thereby removing the need for the tenant to confront the landlord regarding inadequate conditions and improves the PRS overall.
- 3.10. For HMO tenants who may be at risk of homelessness or illegal eviction, or who might be vulnerable or being exploited, the HMO team provides tenancy relations support and advice. The Private Sector Housing Service has also started working with Safer Renting of Cambridge House to expand this offer. Safer Renting provides more specialist advice, support and advocacy to help protect tenants who are often victimised by criminal landlords and has provided a vital extra resource for tenants of HMOs.
- 3.11. Cases they have been involved with to date include cases of harassment, illegal eviction (and threatened illegal eviction), rent deposit protection penalties, financial scams, defending S21 evictions, and helping evicted tenants into temporary accommodation. Where possible, Safer Renting will try to get landlords to follow due process, and can assist in mediation where possible, but again, having this resource available makes it clear to HMO landlords who act unlawfully, either through intimidating behaviour or illegal evictions, the Council will act to protect those who are most vulnerable in this sector.

### ***Empty Homes***

- 3.12. It's recognised there is very high demand for housing in Camden, so by increasing the availability of housing supply by bringing long term empty properties back into use, will contribute to relieving some of this pressure.
- 3.13. The Empty Homes function is due to be incorporated into the Private Sector Housing team to allow for more effective targeting in dealing with long term empty properties. The Council offers Housing Supply Grants to help pay for refurbishments, with various lease agreements, guaranteed rents and other incentives offered to help bring these properties back into use. Grant conditions can include ensuring the property meets the HMO standards where applicable, therefore ensuring a high standard of accommodation is provided for any future tenants.

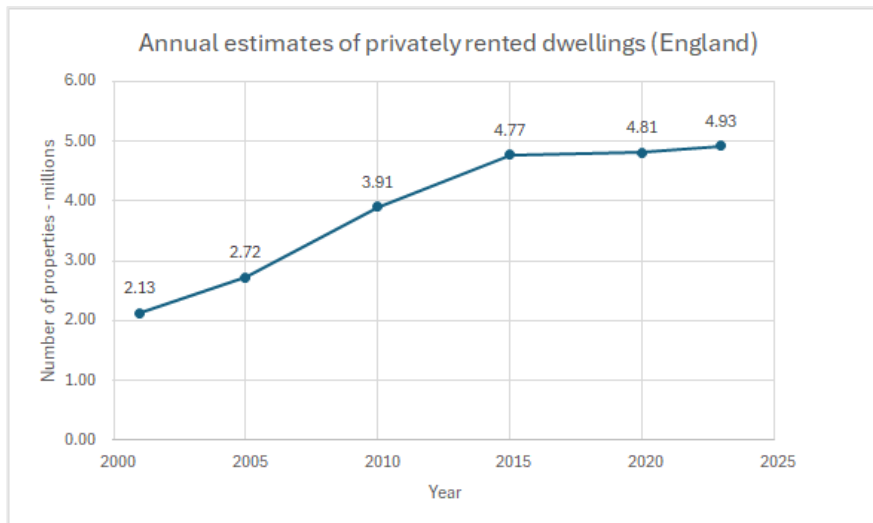
### ***Antisocial behaviour***

- 3.14. The current "Camden Community Safety Partnership Plan" aims to create a safer borough for people to live, work, and visit, and a key priority is to decrease antisocial behaviour and reduce the impact on individuals and communities. The licensing scheme can be seen to contribute to achieving this aim as it offers

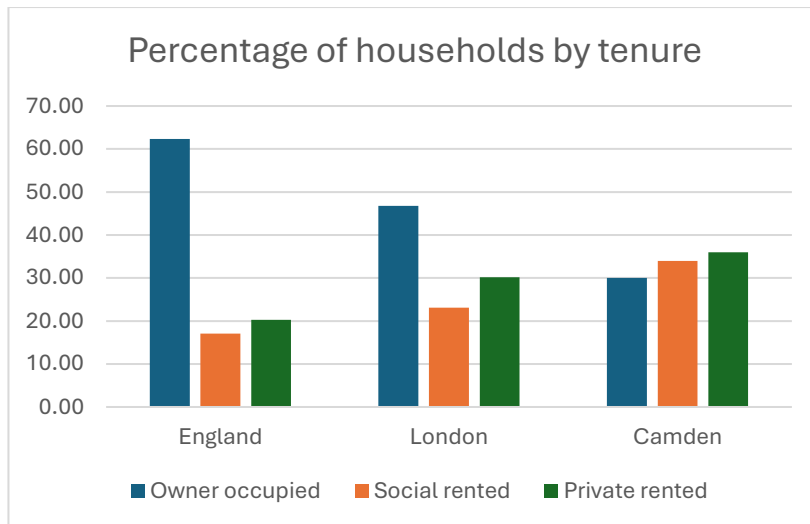
increased level of oversight and powers to tackle ASB via the licence where it arises from these properties. There is also a duty on the Council to ensure the licence is issued to someone who is both “fit and proper” and is the most appropriate person to hold the licence which ensures the conditions of the licence are enforceable.

**Current tenure and rent levels within Camden**

3.15. Nationally, the private rented sector has seen significant growth over the last 20 years. In 2001, 2.1 million households lived in privately rented accommodation, and that figure has now grown to over 4.9 million in 2023. There has been acknowledgement from Government that the private rented sector provides the least affordable, poorest quality and most insecure housing of all tenures, and is set to introduce the Renters Rights Bill with the aim of transforming the experience of private renting.

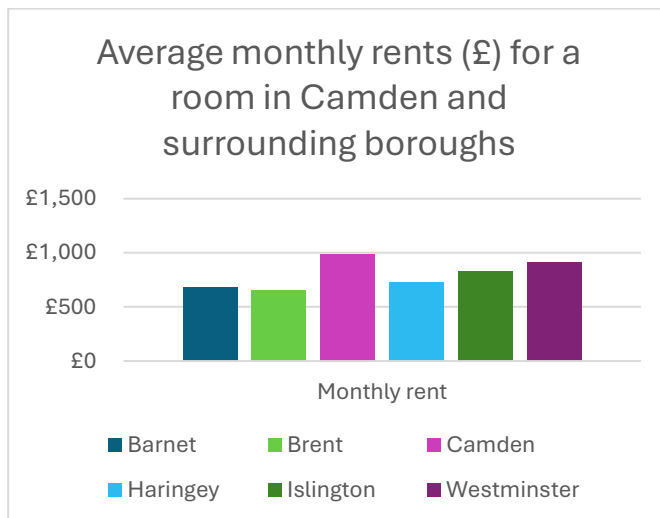


3.16. Although the rate of growth of the private rented sector nationally appears to have slowed in more recent years, within Camden it has grown to now be the largest tenure in the Borough at 36%. 34% is owned by the local authority or a registered social landlord, and the remaining 30% is owner-occupied. Therefore, having an HMO licensing scheme to help regulate and improve conditions within part of the largest tenure in the borough, is consistent with the Councils overall vision of providing safe housing for Camden’s communities.



### Rent levels

3.17. Across the country, affordability of all types of housing has been a significant problem for some time, with rents, fees and practices in the private rented sector in particular attracting many national headlines. ONS data confirms the average cost of renting a room in Camden has now reached £982 per month (as of September 2024), which is the highest monthly amount payable within any of the Boroughs immediately surrounding Camden (City of London data not available).



Borough	Monthly rent
Barnet	£676
Brent	£654
Camden	£982
Haringey	£726
Islington	£826
Westminster	£911

[ONS data. 2024](#)

3.18. With high rents being indicative of a lack of supply and high demand, the inevitable consequence is a pressure on private tenants to accept accommodation where the standards or conditions do not meet their minimum expectations. Therefore, the successful operation of the licensing scheme to help monitor and regulate standards in this sector of the rental market is essential in applying minimum standards and providing protections for private tenants.

3.19. Having considered the legal and strategic background, as well as the current make up of tenure and private rental costs, the operation of the current scheme will now be considered.

#### **4. The current additional licencing scheme process:**

- 4.1. Applications are made online. The applicant is required to provide information relating to ownership, management arrangements, details of any interested parties, and confirm the property layout, rooms sizes, facilities and occupation. Gas Safety certificates, Electrical Safety reports, and fire alarm and emergency lighting certificates are required where necessary. The information and supporting documentation all requires verification. This will include confirming that suitable management arrangements are in place for the property, that the most appropriate person is the proposed licence holder and confirming the “fit and proper” declarations are acceptable. Part 1 of the licencing fee is also payable at this stage.

If the information and documents are satisfactory, the application is considered “duly made”, and the next stage of the process is for the inspection to be carried out.

An Environmental Health Officer completes the property inspection. This is a notified visit, which enables the landlord or managing agent as well as the tenants to be present and raise any matters of concern should they wish to do so. The inspection confirms the condition of the accommodation against the required standards as well as ensuring the minimum room sizes are met. It also allows for any management issues, deficiencies or hazardous conditions which may impact the health and safety of the occupying tenants, to be identified.

The proposed licence is then drafted with a schedule of works that is required in order to meet the licencing standards. This may typically include improving the overall fire safety within the property (fitting fire alarms, fire doors, safety locks and other fire precautions), requiring mechanical ventilation in kitchens and bathrooms, installing additional electrical sockets, and improving kitchen and bathroom facilities where necessary. A reasonable period of time is given for the licence holder to complete the works, and it becomes a condition of the licence (and therefore a legal requirement) for the licence holder to ensure these works are completed. The proposed licence is sent to all interested parties and any representations made are considered before the final licence is issued and comes into force.

As part of this review process, it was noted the high volume of applications within the scheme, coupled with the need to complete the inspection has resulted in there being a delay between the application being submitted and inspection being carried out. Thought will need to be given as to how to manage this bottleneck, to ensure the delay is minimised for the remainder of the scheme or any new scheme. This may include additional resources such as recruiting additional EHOs to complete the property inspections, streamlining the process where possible, and considering whether a more generalised licence could be issued without an inspection being carried out in 100% of cases. An improved IT system is also being introduced which should result in efficiencies when producing the licence.

#### ***Fees and charges for the current scheme***

- 4.2. Local authorities are able to charge fees to cover the costs of their licencing scheme, and the fee must be split into 2 parts:

**Part 1** – the fee levied at the point of application to cover the costs of the scheme's 'authorisation procedures and formalities', i.e. the costs of processing and determining the application; and

**Part 2** – if the application is successful, a further fee is payable to cover the costs of running and enforcing the scheme.

- 4.3. A review of the fees for the previous scheme (2015-2020) revealed they failed to cover the full cost of its operation. This led to a detailed review and analysis of all the costs involved with the scheme and resulted in a simplified fee structure for the current designation. The current fee structure is as follows:

**Standard fees for new HMO applications**

HMO Type	Part 1	Part 2	Total fee payable (on successful application)
House or flat in multiple occupation (section 254)	£1,260	£228	£1,488
Converted building into flats (section 257)	£1,260	£228	£1,488
Purpose-built student accommodation	£1,260	£64	£1,324

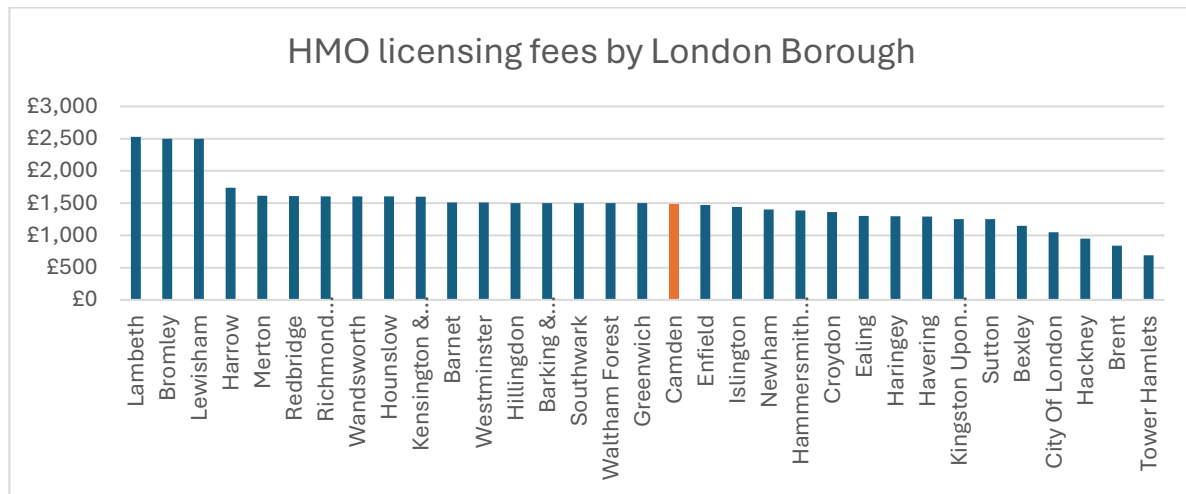
**Standard fees for licence renewal applications**

HMO Type	Part 1	Part 2	Total fee payable (on successful application)
House or flat in multiple occupation (section 254)	£1,065	£228	£1,293
Converted building into flats (section 257)	£1,065	£228	£1,293
Purpose-built student accommodation	£1,065	£64	£1,129

- 4.4. There is also a further discount of £100 given where the named licence holder is a private landlord (individual) who provides evidence of their landlord accreditation status.
- 4.5. A benchmarking exercise of HMO licensing fees across London local authorities has been completed for this review. It revealed a wide range of ways in which fees are calculated, making a direct comparison quite difficult. Many authorities apply a flat fee for both mandatory and additional HMOs, some have a different fixed fee for each type, and some have a fixed basic fee which then increases based on the number of lettings or households within the HMO.
- 4.6. It was noted there is also a wide variation in the weighting of how the fees are split between Part A and B payments. There were also a range of circumstances where reduced fees were applied, such as discounts where the proposed licence holder is an accredited landlord, a registered Charity, or if the EPC for the property was C or above. There was also a large variation in the level of discount applied for accredited landlords, ranging from a £35 discount (Havering) to £100 per room (Lambeth). Some local authorities also offer a discount if the application is a renewal, although these are in the minority, with only 9 out of 33 boroughs doing so.



4.7. When taking all these variables into account, a typical licence fee was noted for each borough, with Camden being broadly average at £1,488.



4.8 Feedback from those staff involved in processing the fees included the lack of an efficient payment/refund system, the time it took to correct and chase up any mis payment of fees from applicants (under or over payment where discounts had been incorrectly claimed, or renewal fees being paid when in fact the application should be considered as new). These matters will need to be considered if a new scheme is proposed.

**Impact and enforcement of the current scheme:**

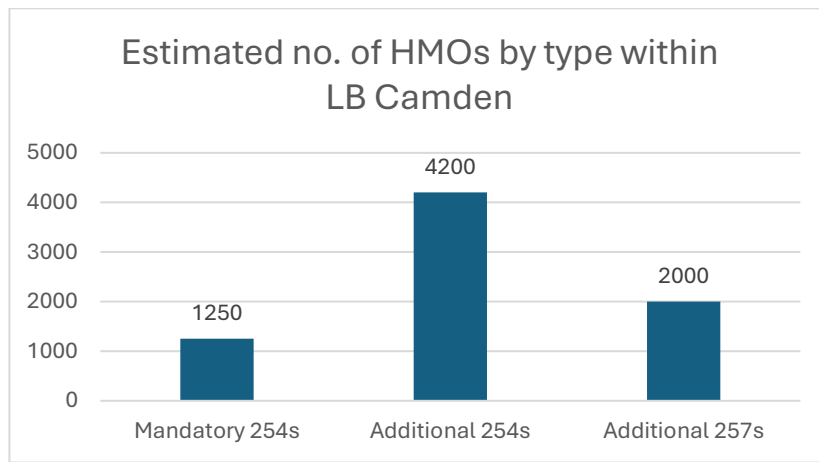
4.9 Section 60 of The Housing Act 2004 contains the statutory duty to “..review the operation of any designation made by them”. Therefore, it must be evaluated whether the scheme is meeting the original aims and objectives of improving the management and conditions of additional HMOs across the borough. Various data has been reviewed to demonstrate the effect and impact the scheme is having in meeting this aim. This includes a review of:

- Licensing data (applications received, licences issued, and those still to licence).
- Licensing to improve standards and management
- Compliance rates with licence conditions and enforcement.
- The 1-year policy introduced for the current designation
- Targeted action for s257 HMOs (building converted into self-contained flats which are often lacking Building regulation approval).
- Local and national reporting of enforcement which promotes awareness of the scheme
- An internal review

**Licensing data**

4.10 BRE data estimates there are approximately 6,200 properties in the borough meeting the additional HMO definition, with the most common type being additional HMOs with shared facilities (section 254 HMOs), and a further 2,000 being converted buildings (section 257 HMOs). This dwarfs the figure of mandatory

HMOs, being only 1,250 across the borough. It can therefore be seen that to only licence mandatory HMOs, would leave a far higher number of such properties free to operate without the increased oversight an additional scheme brings.



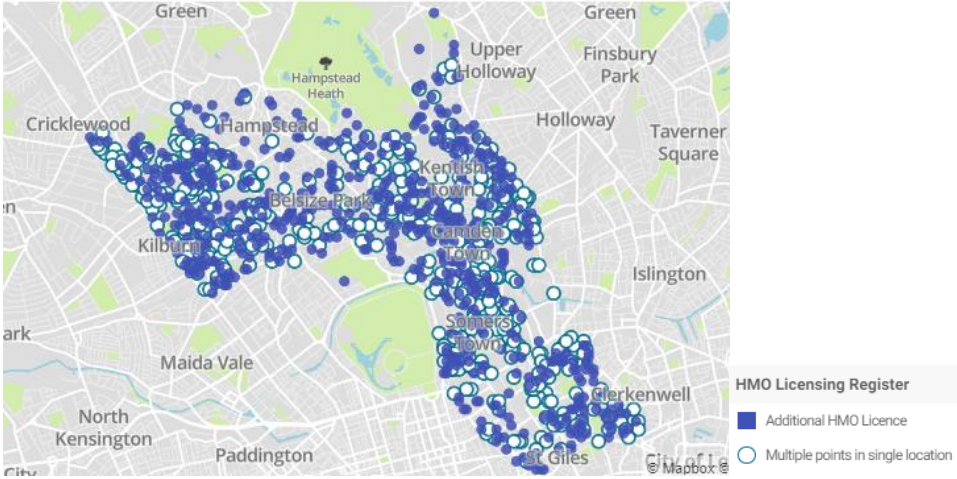
[BRE Housing Stock Modelling Report by the BRE 2020](#)

**The figures relating to licensing as of October 2024:**

Number of additional HMO applications received:	1636
Number of applications validated:	1485
Number of additional HMOs granted within current scheme	2055
Number of additional HMO licences in force:	<b>2566</b>

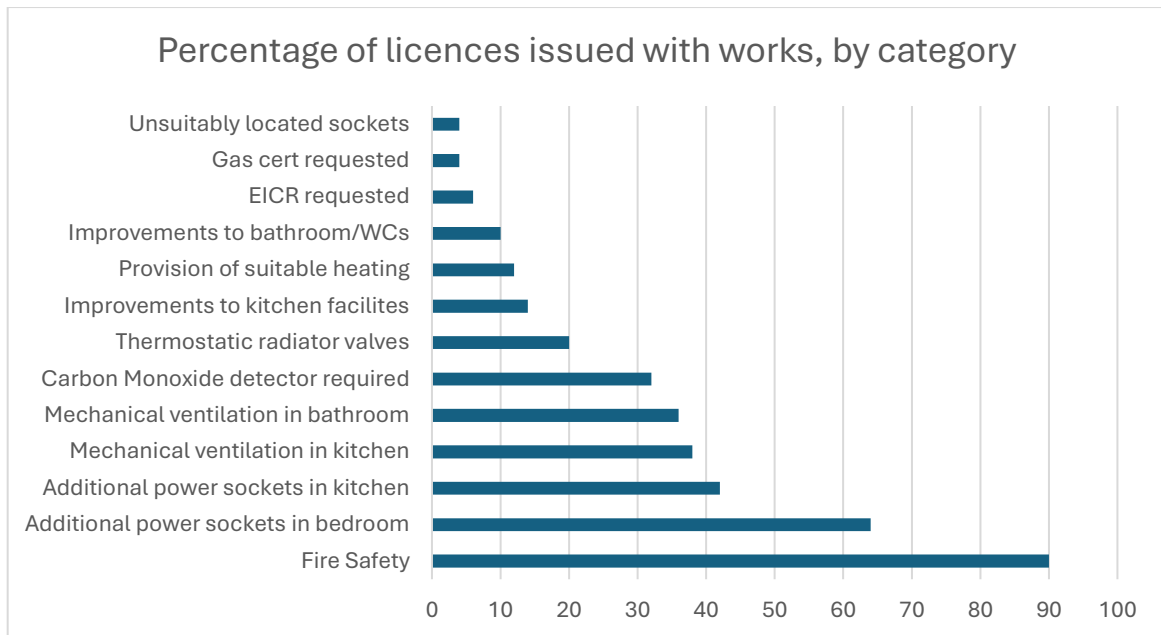
- 4.11 The difference between the number of applications received and licences in force can be explained as follows. A licence application has to be submitted whilst a designation is in force, and the resulting licence issued for up to a maximum of 5 years. As Camden operated a scheme between 2015 and 2020, licences would have been issued in those later years which expire within the current designation period. This leads to an overlap at any one time between the numbers of applications received, licences granted, and those currently in force.
- 4.12 With over 2,500 additional licences currently in force, and close to a further 1,500 (1,485) being processed and validated, there is clearly a good awareness of the scheme with over 4,000 applications either dealt with or awaiting inspection. There remain however a significant number of HMOs operating within Camden without a licence, based on the BRE modelling data.
- 4.13 Thought will be given how to further promote and raise awareness of licensing for the remainder of the current scheme. This promotion should target landlords and managing agents (who should already be aware of their legal obligations, and the significant penalties for failing to comply), but also target tenants of HMOs being aware whether the accommodation they occupy requires a licence or not. Publicising the work carried out by the compliance and enforcement team will also help raise awareness of the consequences of failing to apply for a licence. The work of this team will be summarised later in this review.

4.14. A review of the location and spread of licenced properties shows that other than the areas of open parkland of Regents Park, Primrose Hill and Hamstead Heath, additional HMOs are spread fairly evenly across the borough, rather than being concentrated to just a few streets or Wards. This supports the decision for the scheme to apply Borough wide.



**5. Licensing to improve standards and management**

- 5.1. As previously mentioned, a purpose of the inspection carried out prior to the HMO licence being issued, is to ensure the property meets the HMO standards. These standards and expectations are published on the Council website in guidance documents, and set out the expectations regarding fire safety precautions, the minimum sizes of bedrooms, communal living areas, shared kitchens and bathrooms, as well as the ratio of washing and cooking facilities which can be shared by a maximum number of tenants. These documents therefore confirm the Councils expectations and enable landlords and managing agents to see the standards to be met, if renting out a property as an HMO.
- 5.2. A small number of managing agents (and portfolio landlords) have become familiar with the standards and are able to make the necessary improvements to properties prior to the licensing inspection. In the remaining cases, the inspection identifies the works required to meet the standards, and a schedule of works is provided with the licence with a reasonable period of time given to complete them.
- 5.3. This review looked at a sample of licences to assess what improvement works are most often required, and what percentage of licences require works to be carried out.



- 5.4. As can be seen, the most common category of improvement work relates to fire safety (90%). Fire safety works can relate to a variety of issues, including the installation of mains operated smoke and heat detectors (automatic fire detection systems), the fitting of fire doors to create a protected means of escape, the removal of key operated locks to enable the occupants to exit in an emergency, fitting fire blankets in kitchens, requiring misting systems where inner rooms are identified (and the circumstances allow), and upgrading separation between residential and commercial buildings. All of these items will significantly improve the safety of the property for the occupying tenants.
- 5.5. A range of other works which improve the safety and condition of the properties include items such as providing additional power sockets in kitchens and bedrooms, where otherwise electrical sockets are overloaded, or trailing extension leads are used. The installation of mechanical extractor fans to help prevent damp and mould in bathrooms and kitchens, installing carbon monoxide detectors, ensuring tenants have adequate controls for their own heating, and more general improvements such as providing wash hand basins in WC compartments where they are lacking, can all be dealt with via the licence.
- 5.6. A sample of the data showed that of the additional licences issued, 94% require works to bring the property up to meet the HMO standards. This is a slight improvement on the previous scheme where 99% needed works. On average, between 3 and 4 different standards are improved via a schedule of works (ie: fire, electrical safety, mechanical ventilation, etc).
- 5.7. The inspection is also used to advise of any issues which would be considered a breach of the relevant management regulations, or hazards under the HHSRS (the housing health and safety rating system which is the assessment tool used by Environmental Health Officers to determine housing conditions and health impacts).

- 5.8. Of these licences reviewed, 10% had management regulation breaches identified, and just over 1 in 4 (26%) had HHSRS issues.
- 5.9. The Management Regulation breaches related to matters such as the means of escape being obstructed, and the common parts of the HMO being poorly maintained. This included items such as: lights not working, radiators being detached from the wall, broken kitchen floor tiles, blocked drains, and faulty heating controls.
- 5.10. Of the HHSRS hazards identified during licensing inspections, the most common within the HMOs were:

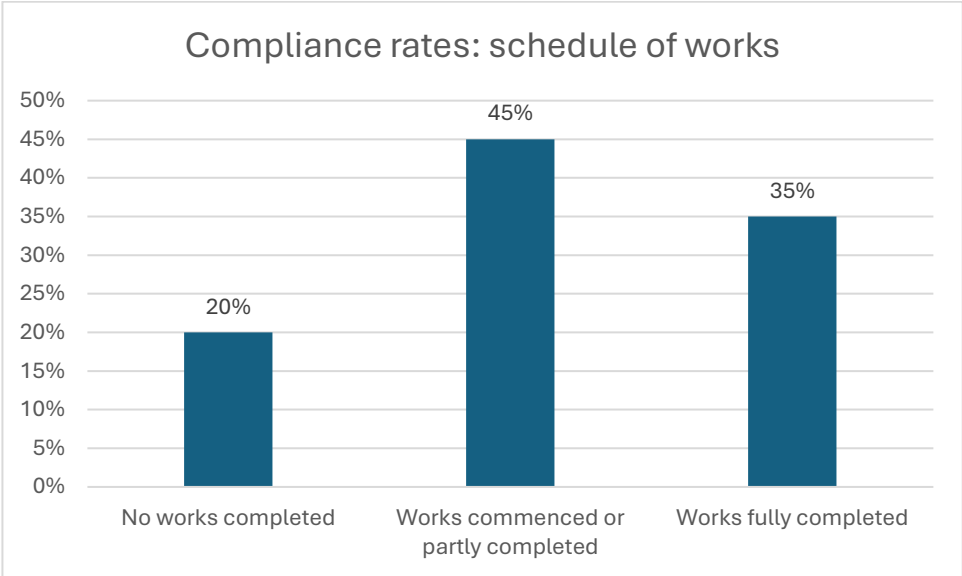
Hazard	Example of deficiency or conditions found
Excess Cold	Lack of insulation (walls, windows, roof), an inadequate heating system
Damp and mould	Lack of controllable ventilation/extraction, disrepair allowing water penetration
Falls between levels	Lack of window limiters or guarding to balconies
Entry by Intruders	Lack of secure door or window locks.
Electrical hazards	Disrepair to electrical fittings or inappropriately cited sockets

5.11. All these matters are therefore captured from the inspection process, and the resulting HMO licence directs the licence holder to complete the works. It is therefore clear from the data that the inspection is extremely effective in identifying where improvements are required, to ensure the HMO meets the necessary standards, and once the works have been completed, provide private sector tenants with improved conditions within their accommodation.

**General compliance rates and enforcement of the scheme**

- 5.12. The inspection process ensures the HMO standards are applied consistently across all HMOs, and where the works are completed, results in improvements to the condition and safety of the accommodation. If these works are not completed, it means the HMO falls below the expected standards and it is an offence under the Housing Act 2004, s72 for failing to comply with this condition of the licence.
- 5.13. To ensure the scheme remains effective, it is essential that licences are complied with, and the Council must enforce this where legal obligations are not being fulfilled.
- 5.14. Under the current scheme, the HMO compliance and enforcement team has been established as a permanent part of the Private Sector Housing service. Originally created after receiving some MHCLG funding, the team has developed and grown into a vital part of the HMO licensing schemes success, both in identifying unlicensed HMOs, and conducting compliance inspections to ensure works are completed and the licence conditions enforced. They also identify and pursue those landlords operating with a rogue or criminal element to their actions.

5.15. As part of this report, a sample of the compliance inspection data was reviewed.



Sample of 183 compliance visits conducted up to November 2024

5.16. These compliance checks confirmed that of the properties inspected, approximately 4 out of 5 had completed some if not all of the works required. 1 in 5 (approximately 20%) had failed to complete any works at all. This is a significant finding as it shows that where a licence has been issued with a schedule of works to complete, when prioritised for a compliance check, 80% of these inspections revealed that the improvement works were underway or had been finished and therefore improving the condition of the accommodation, in line with the scheme’s objectives.

5.17. The fact that in 20% of cases the works had not been carried out, suggests there are still some landlords who either don’t realise the licence requires them to complete the improvement works, or who chose to ignore their legal obligation to comply with the licence requirements.

**Management regulation breaches identified during compliance inspections**

5.18. From the inspections above, it was found that 43% of properties had at least 1 management regulation breach as show below:

Management regulation breached	Total	Percentage
Duty of manager to take safety measures	52	28
Duty of manager to maintain common parts	43	23
Duty of manager to provide information to occupier	33	18
Duty of manager to maintain living accommodation	24	12
Duty of manager to supply and maintain gas and electricity	4	2
Duty of manager to maintain water supply and drainage	2	1

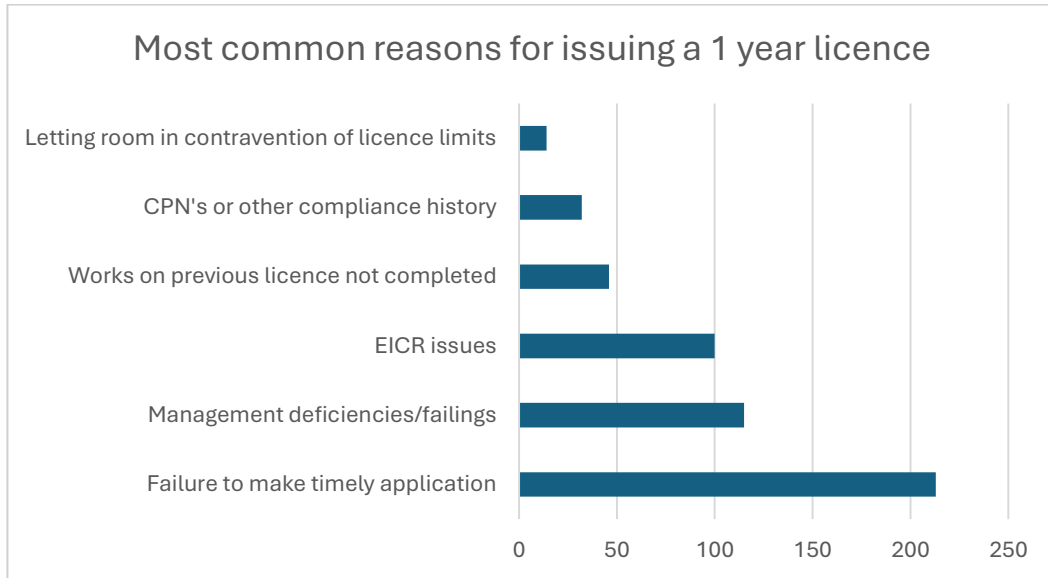
5.19. In cases of non-compliance, it is essential the Council enforces the breaches where they are identified. The above inspections resulted in a combination of

informal and formal action, including civil penalty notices for the offences committed. Civil penalty notices as part of enforcement will be considered further on in this review.

### ***A review of the 1-year policy introduced for the current designation***

- 5.20. When granting an HMO licence, there is no prescribed length for its duration, other than the legislation sets a *maximum* licence period of five years. In granting a licence, the council will ordinarily do so for this maximum five-year period. However, for the current licensing scheme designation, the Council introduced a policy of issuing shorter (1-year) licences where there is evidence that a landlord, a property manager, or other person in control, gives the Council cause for concern.
- 5.21. A comprehensive list of circumstances that may give rise to such cause for concern is set out in the Enforcement Policy and its appendices, but as an example, it includes matters relating to the condition and the management of the HMO such as:
- Failure to submit an application when the property has become licensable.
  - Continuing to let an HMO on an expired licence/ submitting a late application to re-license an HMO ('late renewals')
  - Where the licence is a renewal and the works required on a previous licence have not been carried out.
  - The re-letting of rooms which had been given a "zero" occupancy on the previous licence.
  - Management deficiencies and failings
  - Failing to comply with obligations to tenants.
  - A history of complaints.
  - Failure to pay relevant charges, fines or penalties to the Council (including Council Tax)
  - Failure to possess a current Electrical Installation Condition Report, or where provided, to it is obtained from a suitably qualified contractor who is registered with a competent person scheme specifically for the purposes of undertaking inspection and testing.
- 5.22. The purpose of the Policy's introduction was to focus landlords and/or managing agents towards matters which had been neglected or overlooked either from the obligations from the previous licence, or in the preparation of applying for a renewal. Via its introduction, this policy has also brought a degree of fairness for those who had submitted timely applications with the necessary and valid supporting documentation.
- 5.23. These issues are highlighted either during the checks made as part of the application process, which for example might reveal the property was operating without the necessary licence having been applied for in a timely manner (either a new application or a renewal). Alternatively, the inspection might identify a failure of the licence holder to have completed previously required works to bring the property up to standard, or there might be breaches of the management regulations identified which require immediate attention. Other reasons include

invalid documentation being submitted, such as EICRs being obtained from electricians who are not sufficiently qualified in inspection or testing, and bedrooms which have been confirmed as being below the legal minimum room size being re-let to new tenants, in breach of the previous licence conditions. A review of the reasons for a licence being issued for the 1-year period are shown in the following chart.



5.24. At this stage in the current scheme (October 2024), a total of 2055 additional licences have been granted, with nearly 1 in every 6 of those (331) being identified as having a management failing, or there being a reason for cause for concern. Overall, these figures are encouraging and suggest that the majority of applications are considered satisfactory and receive a 5-year licence, but the range of reasons and the number of licences to which the 1 year penalty applies demonstrates that a significant proportion of HMOs within the scheme have evidence of being managed ineffectively or have a cause for concern. The full list and breakdown of these figures can be found at **Annex 1**.

***Wider licensing enforcement: Financial penalties, prosecutions and banning orders:***

5.25. There are a range of potential offences which can be identified via the operation and enforcement of a licensing scheme. A person in control of a property who operates it as an HMO without making a licence application commits a criminal offence under the Housing Act 2004. Local Authorities can impose civil penalties of up to £30,000 for failing to licence a property or may choose to prosecute the most appropriate person, which can result in an unlimited fine and/or up to 6 months in prison.

5.26. Furthermore, where a licence is in place, a civil penalty notice can also be issued for any breach of the licence conditions (including the failure of the licence holder to complete the work required to bring the property up to standard). Overcrowding the property or occupying undersized rooms is a further offence included as a



breach of licence conditions. Breaching the relevant management regulations can also result in a civil penalty notice for the most appropriate person.

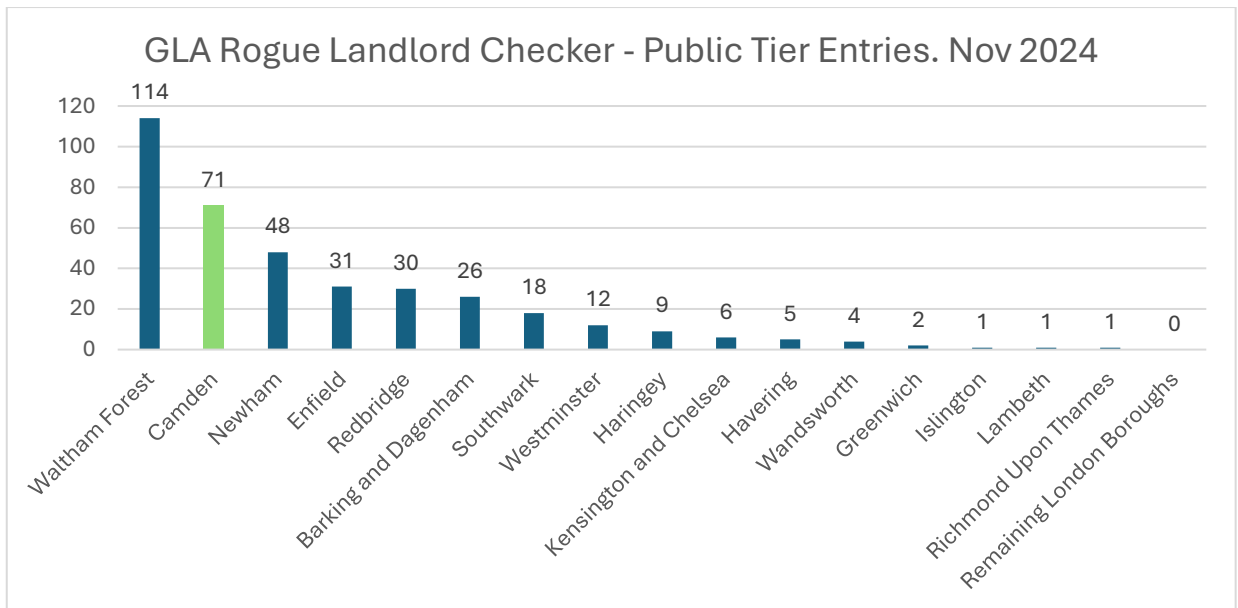
5.27. Through a combination of notified and unannounced visits, once the enforcement team has obtained sufficient evidence that an alleged offence has been committed, a proposed Civil Penalty Notice (CPN) is served which allows the recipient to make representations. These are considered, and then if appropriate, a final CPN is served. These can be appealed to the First Tier Tribunal, but where they are upheld, the guilty party is added to the rogue landlord register. Below are the figures of licensing offences since December 2020 which Camden have recorded on the rogue landlord database.

<b>Housing Act 2004 offence</b>	<b>Number of CPNs</b>	<b>Average CPN issued</b>
Failing to licence an HMO. Section 72 (1)	75	£5,488
Breaching permitted numbers. Section 72(2)	5	£6,900
Breaching licence conditions. Section 72(3)	26	£8,711
Breaching management regulations. Section 234(3)	113	£4,224
<b>TOTAL</b>	<b>219</b>	<b>£5,251</b>

5.28. Where offences are so severe, or there has been a history of previous and significant non-compliance, the Council can choose to prosecute the alleged offender, rather than issue a CPN. Whereas a CPN is limited to a maximum of £30,000, cases heard via the Courts have no upper limit to the level of fine the Judge can impose. Via the HMO enforcement team, Camden Council has taken a number of prosecutions relating to HMO licensing or management regulation offences. Cases have involved multiple parties and multiple offences against both individual landlords and limited companies. With no upper cap, the more significant fines have ranged from £40,000 to over £80,000. The offences and penalties apply equally to both mandatory and additional licencing schemes and provide a strong deterrent to those considering entering the HMO market without complying with their legal obligations. A summary of some prosecution case outcomes is included at **Annex 2**.

5.29. During the current scheme, Camden Council has also successfully obtained 7 Banning Orders against the worst offending landlords, the result of which means they are prohibited from letting property or being licence holders in England.

5.30. In relation to other London Boroughs, Camden continues to take a leading role in PRS enforcement, with only Waltham Forest having more entries on the public facing Rogue Landlord Checker, with many Boroughs have no entries at all.



5.31. These figures and actions clearly demonstrate Camden’s commitment to actively enforcing the existing licensing scheme, and that they take the most robust action possible under the available legislation. This should provide compliant landlords with reassurance that the Council actively pursues those who chose to ignore their legal obligations, and who are still operating within the sector. The number of offences being punished via CPNs or prosecutions, and the fact that Banning Orders are being successfully obtained, does send a clear message to those avoiding licensing that the Council actively seeks out these properties and with deal with those responsible robustly.

## 6. Wider aspects of the scheme

### **A review of a project targeting s257 HMOs (buildings converted into self-contained flats)**

- 6.1 There can be less awareness that these types of HMO require a licence, as they don’t require a shared facility in the same way a “typical” HMO does, and the units of accommodation in these buildings are all self-contained. They can be poor quality conversions, and will lack 1991 Building Regulation approval. They often require additional fire safety measures to be installed in the building to provide a protected means of escape. It can also be a resource intensive process to confirm whether the buildings meet the required ratio of less than 50% of the flats being owner occupied, as well as whether the conversion complied with the relevant Building Regulations at the time.
- 6.2. To raise awareness of the need to licence, the team carried out some targeted area action in Kilburn. A sample of 440 properties were identified, with 232 of these found to be converted into flats.

- 6.3. The project identified 145 possible s257 HMOs, with these properties being written to informing the owner of the existence of the scheme, and inviting an application where necessary.
- 6.4. 11 applications have been received, and a further 9 identified as having particularly poor standards of management. In these cases, where a high fire risk was identified or there were hazards such as “entry by intruders” (where insecure front door locks meant the buildings were vulnerable to break in or antisocial behaviour), these properties were prioritised for further investigation and enforcement action where necessary.
- 6.5. Targeted area action such as this is a good way of raising awareness of the scheme and any future similar action would help in raising the number of applications from this type of property.

### ***Local and national reporting of the scheme and enforcement***

- 6.6. It is important to promote and raise awareness of the scheme. **Annex 3** provides some examples of newspaper or website coverage of successful prosecution and enforcement action taken by Camden Council in relation to HMO licensing offences. Such articles demonstrate to landlords, tenants and the wider public that the licensing scheme is being enforced robustly, and helps promote the schemes existence. The sample include:
  - Environmental Health News magazine article. June 2021.  
Promoting the work of Camden Councils Rogue Landlord taskforce; combining Environmental Health and Tenancy Relations Officers for successful enforcement.
  - Landlord Zone article from website. February 2022.  
Reporting of rogue landlords and 4 banning order secured by the private sector housing team at Camden Council.  
  
Guardian Newspaper. March 2024.
  - Reporting of £67,000 fines for breaches of HMO licence conditions and rogue landlord database.
  - The Ham & High magazine - online article. September 2024.  
Reporting of near £50,000 fine for HMO offences including fire safety and overcrowding.

### ***Internal feedback***

- 6.7. Views on the operation and enforcement of the current scheme were sought. There were some suggestions regarding improvements which could be made to the current or any future scheme. These related to the fees, how to speed up the issuing of licences, the 1 year policy, the EICR checks etc. These will be considered and any changes will be incorporated into proposals for a any new scheme which is to be consulted on.

## **7. Conclusion of review findings**

- 7.2. Improving housing conditions remains central to the Councils vision. “We Make Camden” seeks to ensure the borough has decent, safe and warm housing for everyone. Some of the key objectives of the additional licensing scheme sit at the heart of this challenge, so it’s principals align directly with the Councils mission.
- 7.3. Overall, the additional licensing scheme is resulting in clear improvements to these privately rented properties. These relate to the safety and condition of these HMOs, as well as their management. The physical improvements will have a positive impact on tenants health, safety and wellbeing, and good management ensures that if issues arise such as antisocial behaviour, refuse problems or noise, they should be responded to and dealt with effectively and efficiently.
- 7.4. Despite a previous scheme operating, there remain a significant number of HMOs without a licence application having been submitted. Increasing the awareness of the scheme and continuing the projects of targeted area action should all continue for the remainder of the current scheme to help increase the number of applications being submitted. Any future scheme should also consider how to achieve higher application rates. BRE modelling data indicates the additional licensing scheme applies to 5 times the number of properties as the mandatory scheme does.
- 7.5. The current fees appear to be reasonable in relation to other London boroughs, with Camden’s fee being within the average range. Camden is consistent with other boroughs in offering some discounts for accredited landlords and student accommodation but is in the minority in offering a discount for renewal applications.
- 7.6. It is clear the property inspection allows the Council to produce a licence which is reflective of the conditions found within the property and is therefore effective and enforceable. With the bottleneck of applications awaiting inspection however, should a new scheme be sought, consideration should be given as to how licences may be issued more quickly. This may include circumstances where high management standards, very good compliance history and no causes for concern allow for a licence renewal to be issued without an inspection. But any new application for a property which has not been licensed before, should be inspected. These factors should be considered further in any report for a future scheme.
- 7.7. The data reviewed is encouraging. 94% of licenses issued require works to bring the property up to standard, with the most common improvements relating to fire safety. A range of other works included electrical safety improvements, the installation of mechanical extractor fans to help prevent damp and mould in bathrooms and kitchens, installing carbon monoxide detectors, ensuring tenants have adequate controls for their own heating, and more general improvements such as providing wash hand basins in WC compartments where they are lacking.
- 7.8. Licences prioritised for compliance inspections found that in 80% of cases, works were either in progress or had been completed. The 20% of cases found where no works had been done resulted in a combination of informal and formal action, including financial penalty notices being issued.

- 7.9. Approximately 5 out of 6 applications are considered satisfactory and receive a licence for the full 5-year term. But there remain a significant number of applications where there is a cause for concern, relating to either the management of the property or where previously required improvements have not been carried out, and a 1-year licence is given.
- 7.10. The scheme is being actively enforced by the Council, as demonstrated by the number of civil penalty notices issued, the prosecutions taken, and banning orders obtained, all of which will assist in driving out the worst and “rogue” landlords from operating within the Borough.
- 7.11. This concludes the review of the current scheme.

## **Annexes to Review Report**

1. Data reviewed of reasons for 1-year licences.
2. Summary of sample of prosecution case outcomes
3. Local and national reporting of enforcement cases relating to HMO licensing
4. Photographs of issues found at HMO licensing inspections

## Annex 1

### Reasons for 1-year licences, as of October 2024

Reason for 1 year licence, relating to a management issue or a cause for concern	Additional		Mandatory*	
	1 year issued 331		1 year issued 163	
	No.	No. as %	No.	No. as %
Failure to make timely application	213	64	102	63
Management deficiencies/failings	115	35	46	28
EICR issues	100	30	52	32
Works on previous licence not completed	46	14	46	28
CPN's or other compliance history	32	10	14	9
Letting room in contravention of licence limits	14	4	9	6
Failure to meet obligations to tenants	7	2	3	2
Gas cert issues	8	2	1	0.6
Failure to obtain permissions/approvals	8	2	2	1.2
False, inaccurate or misleading info on application	4	1	3	1.8
Failure to notify relevant parties of application	2	1	0	0

Data extract from APP, Oct 2024

\*Mandatory rates included for comparison.

## Annex 2

### Summary of sample of prosecution case outcomes

Summary of significant cases taken by Camden Council, relating to HMO licensing and management regulation offences.

Property	Date	Found guilty of offences	Guilty party	Total penalty including victim surcharge and costs
Case 1	2024	72(2), 234, 238	A Limited Company and an individual	<b>£47,200</b>
Case 2	2023	72(1), 234, 236	An individual	<b>£9,930</b>
		16,72(1), 234	A Limited Company	<b>£44,190</b>
		72(1), 234	A Limited Company	<b>£14,690</b>
		72(1), 234	A Limited Company	<b>£9,190</b>
Case 3	2022	72(1), 234	A Limited Company	<b>£50,190</b>
		72(1), 234	An individual	<b>£7,190</b>
Case 4	2022	72(1), 234	A Limited Company	<b>£80,190</b>
		72(1), 234	An individual	<b>£40,190</b>

Offence	Description
16	Failing to provide information. Local government (Miscellaneous Provisions) Act 1976
72(1)	Failing to apply for a licence. Housing Act 2004
72(2)	Breaching permitted numbers on licence / overcrowding. Housing Act 2004
234	Management regulation breaches. Housing Act 2004
236	Failing to provide documents requested. Housing Act 2004
238	Providing false or misleading information. Housing Act 2004



## **Annex 3**

### **Local and national reporting of enforcement cases relating to HMO licensing**

#### **Article 1:**

Environmental Health News magazine article. June 2021.  
Promoting the work of Camden Councils Rogue Landlord taskforce; combining Environmental Health and Tenancy Relations Officers for successful enforcement.

#### **Article 2:**

Landlord Zone article from [website](#). February 2022.  
Reporting of rogue landlords and 4 banning order secured by the private sector housing team at Camden Council.

#### **Article 3:**

Guardian Newspaper from [website](#). March 2024.  
Reporting of £67,000 fines for breaches of HMO licence conditions and rogue landlord database.

#### **Article 4:**

The Ham & High magazine - [website](#). September 2024.  
Reporting of near £50,000 fine for HMO offences including fire safety and overcrowding.



TALES FROM THE FRONT LINE

# ‘Our intervention involving tenants really does work’

Camden Council’s Rogue Landlord Taskforce brings together the skills of EHPs and a tenancy relations officer to great effect

**F**OR ANY EHP WITH experience of HMOs, Jack Kane’s story starts off on familiar ground. Having identified a property owned by a well-known family of rogue landlords as likely to be an unlicensed HMO, his team obtained a warrant. “We executed the warrant and went in with the police. It was as expected: an unlicensed HMO. There were the partition walls to create additional bedrooms, there were inadequate fire precautions, undersized rooms, it was overcrowded. Everything we would expect. The tenants were all migrants, none of them had been given any tenancy agreements. They’d been given a name of a person who would come and collect the rent every week, and a mobile telephone number.”

After the inspection, an agent turned up at the property and threatened to turn off the electricity if the tenants didn’t vacate. What the agent perhaps didn’t know was that Kane’s team was now in constant contact with the tenants. “During the visit my colleague Annie [a tenancy relations officer] had advised them of their rights. We’d then given



Jack and Annie on an inspection visit

## “The Taskforce’s mission is to tackle the most exploitative landlords”

them a copy of a letter addressed to the police explaining the situation, which meant the police would understand if an illegal eviction was taking place.”

### TAKEN TO TASK

The agent did cut off the electricity – and one of the tenants called Kane’s team. Within a few days Kane had got the electricity company round to replace the meter and reinstate the power. The team is now in the process of applying for an emergency injunction to prevent any further harassment of these tenants.

And the police know that those tenants are at high risk of illegal eviction.

This is a precis of a complicated case but illustrates how Kane’s team – Camden Council’s Rogue Landlord Taskforce – works. Set up in 2019, the Taskforce was initially funded through MHCLG’s Controlling Migration Fund. “The aim of the team was to address rogue landlords and letting agents who were exploiting migrant tenants living in unlicensed and dangerous HMOs,” Kane says. That remains its core purpose, and since last year it has been funded by the council. Camden has had an HMO licensing scheme since 2015. But with an estimated 8,000 HMOs in the borough, and a high proportion of migrants and students living in them who might not be aware of their rights as tenants, the Taskforce’s mission is to tackle the worst and most exploitative of those landlords.

There are four people on the team: Kane, an EHP and the operations manager; Annie Ngundam, a tenancy relations officer; one other EHP; and a solicitor. As we spoke, three further posts were being advertised.

Kane and Ngundam each has an obvious appreciation of what the





Camden Council's Rogue Landlord Taskforce helps guard against unsafe conditions for tenants

other brings to the team. Kane says: "With a lot of our initial visits we're turning up at 8am. Understandably there are some tenants who have refused us access. But the way we approach it is 'This is nothing for you to worry about. We are here to support you.'"

This is where Ngundam comes in. "I introduce myself and immediately try to let the tenant know what to do and empower them by informing them of their rights while the EHOs get on with their work," she says. "And it works. If they didn't have that knowledge, and the landlord started to harass them, they would probably just leave the property."

Kane adds: "Whereas if we just went as EHOs to a property, we'd obviously refer the situation with the tenants on to our colleagues, but it might take a couple of days for a letter to be sent. The tenants could have conceivably been illegally evicted in that time."

#### TENANTS WHO KNOW THEIR RIGHTS

The empowerment of tenants is one of the Taskforce's weapons. Tenants who know their rights put pressure on rogue landlords who try to stay under the council's radar. Ngundam says: "We've had cases where the landlord has really backed off knowing that the council is involved. They might even get their solicitors to get in touch with us and sometimes issues are resolved that way."

With MHCLG funding, the council is creating a tenant engagement project to build on this aspect of the Taskforce's work. Kane adds: "I'm sure that many tenants would have been illegally evicted if we weren't so forceful in our approach."

#### USEFUL INFORMATION

Another weapon in the arsenal is data analysis. The council is running a project to identify unlicensed HMOs using council tax data, land registry information, flatshare websites, even bin collection data. Kane says: "That isn't quite in full flow yet but they've given us a list of about 1,000 properties that they believe could be unlicensed HMOs. We did a cross-referencing exercise where we took five of those and it does appear that four of them are unlicensed HMOs."

In the last financial year, the Rogue Landlord Taskforce has issued civil penalty notices (CPNs) to landlords and agents totalling £255,000, prosecuted two with two further prosecutions pending and dealt with 65 requests for tenancy relations support. "But a lot of this is also focused on making sure that licence applications are then submitted so that the properties comply," Kane says, describing a situation where one CPN triggered more than 30 licence applications from the same landlord.

Having the key skills of Ngundam, Kane and their colleagues in one

#### DID YOU KNOW?

- 1 Around a third of Camden residents rent from private landlords.
- 2 Camden was the first inner London borough to introduce an additional licensing scheme for HMO properties in 2015. In December 2020 the scheme was renewed for a further five years.
- 3 Since the scheme's introduction more than 3,600 Camden HMOs have been inspected and licensed, resulting in an estimated 15,000 improvements made by landlords.
- 4 The council estimates that there are over 8,000 HMOs in Camden, with a significant number still illegally unlicensed.
- 5 Camden has secured more than 100 prosecutions and put more than 50 rogue landlords on the Mayor of London's Rogue Landlord Checker. The team also secured the first ever banning order of a landlord in London against a man who repeatedly placed tenants' lives at risk through letting unsafe housing. The order meant he could not let a property for the next four years.

DO YOU HAVE A TALE TO SHARE? Email [editor@cieh.org](mailto:editor@cieh.org)



close-knit team means the Taskforce is nimble enough to stay ahead of agents and landlords trying to make retaliatory evictions. "Our intervention involving tenants really does work," Ngundam says. "I've had cases where after the tenants receive the letters from us, the landlord is on the phone to me. We now have some kind of contact with them, which we never had in the past."

**"I'm sure that many tenants would have been illegally evicted if we weren't so forceful in our approach"**



**Nigel Lewis**  
February 17, 2022



Camden Council has handed out banning orders to four rogue landlords for letting an unlicensed and unsafe home in Kilburn.

All part of the same interconnected group of London-based family and business associates - Mohammed Ali Abbas Rasool, 30, of Manor House Drive, Daya Ahmed Daysaldeen, 64, of Upper Grosvenor Street, Henna Mohamed Rashid, 65, of Duke Street, and Talal Faliez Fahad Sagor Alenezi, 82, of Picton Place were previously fined for ignoring defects at the property in Pandora Road (pictured).

A [First Tier Property Tribunal heard](#) that the building originally had six/seven rooms and two bathrooms but was converted illegally to provide 16 self-contained units. During inspections, council officers found a lack of fire safety equipment and poor management of the flats.

Last July, Rasool was slapped with the [first ASBO injunction against a landlord](#) after he was found to have harassed and tried to illegally evict tenants. The High Court heard of similar reports made against him by tenants in other boroughs.

### Prison

The banning orders will take effect in six months and prevent all four from letting property, engaging in letting agency work, and engaging in property management work in England for five years. If the orders are breached, penalties can include prison or a fine, or both, or a civil financial penalty of up to £30,000.



Camden's private sector housing team is supporting the tenants of the Kilburn property. It has now secured seven banning orders against landlords 'the highest of any local authority in England.'



Councillor Meric Apak (pictured), cabinet member for [better homes](#), says its HMO licensing scheme and rogue landlord taskforce are continuing to improve the standards in Camden's private housing sector.

He adds: 'Most landlords are decent law-abiding people however, for too long a minority have been able to let housing that is unsuitable while exploiting their tenants and woefully disregarding their wellbeing and safety. The legal action taken in this case was a necessary last resort.'

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## Part of billionaire family's property empire named on London's rogue landlord list

### Subsidiary of Lazari Investments fined £67,000 for breaches of HMO licence conditions on Camden flats

[Jack Simpson](#)

Sun 24 Mar 2024 13.00 GMT

A family-owned property empire whose holdings include the former Fenwick department store building on London's Bond Street has seen one of its subsidiaries named on the city's rogue landlords register and hit with fines totalling £67,000.

The Lazari family have an estimated fortune of £2.5bn, [placing them 72nd on the Sunday Times rich list](#). It is based on a property portfolio that includes some of the most luxurious addresses in central London as well as rental flats in the north of the city.

The Guardian has learned that last July a subsidiary of the property group Lazari Investments was fined seven times and named on the Greater London authority's rogue landlord or agent database in relation to the condition of three flats above shops on Camden High Street.

Fines are imposed when landlords fail to comply with licensing conditions that require homes to be in "safe and good condition". The penalties were all issued on 12 July, and the company, Lazari Properties 1, will remain on the the GLA database for 12 months from that date.

The flats are all houses in multiple occupation – typically low-cost rentals in which two or more households share amenities such as a kitchen or bathroom.

The GLA database was set up by the London mayor, Sadiq Khan, in 2017 to "name and shame" poor landlords or agents, and publicly lists property owners who have been fined more than £500 by a housing authority. It also allows tenants to report issues and people looking to rent to check a landlord's track record.

Cypriot-born Christos Lazari built his property empire after making his fortune in the fashion business. He set up the Drendie Girl label, which sold in London's high street stores during the 1970s, before using his profits made from the company to invest in London real estate, acquiring property in Mayfair, Baker Street and Tottenham Court Road.

Lazari's children, Leonidas, Nicholas and Andrie, have continued to grow the business since his death in 2015. The family now own 3.25m sq ft (301,935 sq metres) of commercial real estate in central London, making them one of the capital's biggest landlords.

Fenwick's department store on Bond Street, London, the morning after it closed its doors for the last time. Photograph: Leon Neal/Getty Images

The portfolio includes 63 New Bond Street, which was bought for £430m in 2022 and housed the luxury department store Fenwick from 1891 [until February this year](#). Lazari Investments is planning to spend millions more redeveloping the site, with a mix of retail and office space.

All three Lazari siblings are directors of Lazari Properties 1, which owns the Camden flats. In one of the properties, situated above a pharmacy, the council found licence conditions had been breached five times, resulting in fines totalling nearly £40,000 including one for £17,500.

A register of licensed houses in multiple occupation shows the Lazari family owns 11 such properties across the borough of Camden. Photograph: Christian Sinibaldi/The Guardian

The company was fined £17,500 and £13,000 respectively for two properties above a restaurant and bar.

When asked by the Guardian, Camden council said it could not provide further detail on what its housing officers found. Council rules state a landlord must secure a licence for each property they own, and adhere to certain conditions including gas and safety checks, installing and maintaining smoke alarms and maintaining the property in reasonable repair.

The maximum fine is £30,000, with anything [between £10,000 and £20,000 regarded as a "serious" breach](#), and those below that regarded "moderate". Three of the fines relating to Lazari Properties 1 are in the serious category, while the other four would be labelled moderate.

A register of licensed houses in multiple occupation released by Camden this month showed the family owned [11 such properties across the borough](#).

A spokesperson for Lazari Investments said: "Once we were aware of the breaches, we commenced a process to rectify them with a particular focus to ensure no tenants were at risk."

### Dodgy Camden landlord and agency fined for housing breaches

21st September 2024

A dodgy landlord and his agency have been fined nearly £50k for packing too many people into two homes - one of which had faulty fire doors. Alvaro Odeh-Torro and his company London Living Group also gave Camden Council false information about rent receipts. At Highbury Corner Magistrates Court on September 6, they were convicted of eight offences under the Housing Act at two Camden houses in multiple occupation (HMOs).

Camden Council inspectors swooped on the homes early in 2023 after learning that Odeh-Torro, of London Road, Leigh-on-Sea, and Chalk Farm Parade, Hampstead, and his company were involved in their management. Odeh-Torro was known to the council after it took action against other companies, Alterna and LRTR, for similar offences, and fined companies of which he was a director.

Visiting 25 Carrol Close, Gospel Oak, in February 2023, they found more households than its HMO licence permitted living there. Officers also spotted several breaches of regulations, including faulty fire doors.



Inspectors found multiple breaches including faulty fire doors in homes managed by London Living Group (Image: Camden Council)



An undersized room was being occupied despite the HMO licence saying it should not be lived in (Image: Camden Council)

An inspection of 68-70 Falkland Road in Kentish Town the following month revealed someone living in an undersized room despite its licence specifically stating it should not be

occupied. Odeh-Torro and London Living Group, based in Chalk Farm Parade, Hampstead, also pleaded guilty to offences under the Housing Act after they were found to have provided false or misleading information to the council about the receipt of rental payments.

Cllr Sagal Abdi-Wali, Camden Council's cabinet member for better homes, said: "Around a third of Camden residents rent from private landlords and they deserve to live in properly regulated, safe homes and to be treated fairly.

"Most of our landlords are decent law-abiding people. However, for too long, a minority have been able to let housing that is unsuitable while exploiting their tenants and woefully disregarding their wellbeing and safety.

"Our Private Sector Housing service are continuing to improve the standards in Camden's private housing sector, empowering renters to take action and helping good landlords to run successful businesses.

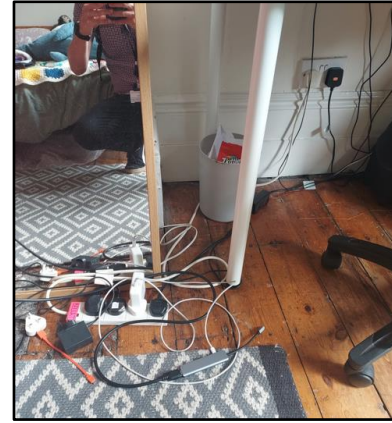
"Our message to landlords and letting agents is that we are here to work with you; to provide advice and assistance first of all and to ensure you can meet your obligations."



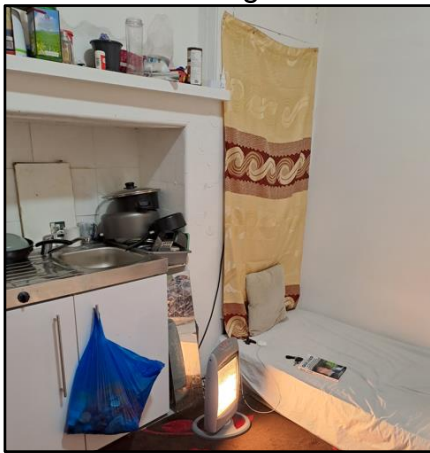
Photographs of issues found at HMO licensing inspections



Broken electrical sockets with exposed wiring



Inadequate provision of electrical sockets leading to overloaded extension leads



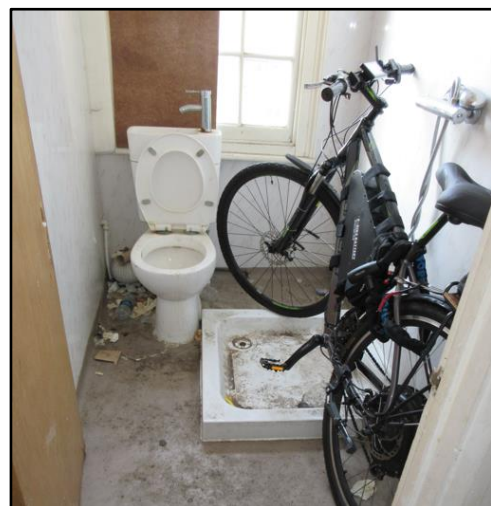
Bedsit with totally inadequate cooking facility and portable heater presenting significant fire risk



Cooker in filthy condition



"Kitchenette" with inadequate space, worktop provision, food storage, power sockets and general layout.



Communal WC and shower in total disrepair

Photographs of issues found at HMO licensing inspections



Communal cooker with defective heat seal and scorched controls.



Bedroom of 5.6m<sup>2</sup>, below national statutory minimum, being let



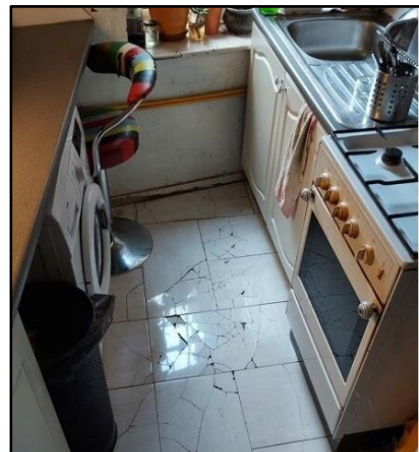
Communal kitchen with insufficient worktop, plug sockets and poor layout



Washing machine in means of escape



Fire safety issue from lack of door and partition to separate the kitchen from means of escape



Cracked floor tiles in communal kitchen

Photographs of issues found at HMO licensing inspections

**Before**



Exposed electrical component presenting risk of electrocution

**After**



New heated towel rail installed



Damp conditions affecting shower ceiling



Cause investigated and replastered



3 Inner rooms required fire protection via the installation of this partition.



This work physically separated the means of escape thereby improving fire safety