

REQUEST FOR DIRECTOR DECISION – DD2693

Supporting renters at risk of illegal eviction by funding Safer Renting and the Better Renting programme

Executive summary:

This decision proposes that the Mayor provides grant funding to expand the Safer Renting programme. This would support London's private renters who face illegal eviction, and are at risk of homelessness, to sustain their tenancy. There is also an opportunity to supplement the GLA's objectives, by promoting and expanding the Mayor's existing upskilling training offer for private rented sector enforcement officers across the London boroughs.

Decision:

That the Executive Director of Housing and Land approves expenditure of:

- £60,000 in grant funding to Cambridge House and Talbot, to expand the delivery of its Safer Renting programme – thus increasing the reach and scope of its activities to support London's private renters at risk of, or experiencing, illegal eviction
- £30,000 to procure training from external organisations, which extends the GLA's existing upskilling training offer (including on illegal eviction and harassment) to private rented sector (PRS) enforcement officers across the London boroughs, as part of the Mayor's PRS Partnership and the Better Renting programme.

AUTHORISING DIRECTOR

I have reviewed the request and am satisfied it is correct and consistent with the Mayor's plans and priorities.

It has my approval.

Name: Tim Steer

Position: Executive Director, Housing and Land

Signature:



Date:

19/02/2024

PART I – NON-CONFIDENTIAL FACTS AND ADVICE

Decision required – supporting report

1. Introduction and background

- 1.1. Despite having no powers over private renting, the Mayor has committed to standing up for London's 2.7m private renters.¹ Illegal eviction is the sharp end of private renting in London, where renters are at risk of being evicted through landlords changing the locks; disposing of renters' possessions onto the street; and harassing tenants until they have no choice but to leave.
- 1.2. The potential human impact of an illegal eviction cannot be overstated, in terms of risks to the physical and mental wellbeing of families and vulnerable renters. Victims of an illegal eviction are at risk of homelessness and/or sleeping rough; and may enter temporary accommodation. Due to the lasting trauma of losing a home, it can also be difficult for those who are rehoused to feel safe in their home again. This is especially true for renters who have lost their home following physical violence, or weeks of harassment.
- 1.3. Many boroughs in London lack capacity and resources to proactively tackle rogue landlords, improve standards and support private renters due to years of government budget cuts. Local authorities need sufficient resources and capacity to ensure that landlords do not allow their property to fall into disrepair.
- 1.4. No official statistics exist on the prevalence of illegal eviction. Many renters do not know that the practices that constitute this type of eviction are illegal. The Safer Renting programme, which is run by Cambridge House and Talbot (Cambridge House), conducts an annual count of evictions in England and Wales that are considered illegal under the Protection from Eviction Act 1977. The most recent report indicated a 19 per cent increase from 7,341 reported offences in 2021, to 8,748 in 2022. A total of 26 landlords were convicted in 2022.² Taken with this data, the Ministry of Justice's prosecution figures suggest that 99 out of 100 offenders avoid prosecution. Safer Renting highlighted this data in a December 2023 press release.³
- 1.5. In responding to these challenges, the Mayor has decided to intervene by making funding available to: increase the Safer Renting programme's capacity; and expand the Better Renting programme.

Safer Renting programme

- 1.6. Safer Renting is one of the programmes delivered by Cambridge House, a social justice charity that aims to tackle poverty and inequality across various frontline services and local authority areas in and around London. It is the recommended provider for receipt of Mayoral grant funding, because it has had a unique and established service offer in London since 2015. This offer is detailed below:
 - Its unique selling point is the provision of direct specialist support and advice to private renters who are exploited by rogue landlords, and facing immediate illegal eviction. This frequently includes intervening on the doorstep to keep renters in their homes.
 - Safer Renting's model of support has a 93 per cent service-user satisfaction score for case outcomes; in 2021-22, it successfully sustained tenancies in 51 per cent of cases.⁴

¹ GLA Housing and Land, [Housing Research Note 9: Understanding recent rental trends In London's private rented market](#), June 2023

² Cambridge House, [Safer Renting – Offences under the Protection from Eviction Act 1977 in England: 2022 update of the annual count](#), November 2023

³ Cambridge House, press release, [Safer Renting: Illegal eviction and harassment](#), December 2023

⁴ Cambridge House, [Annual Report and Accounts 2021-22](#)

- Safer Renting operates across 11 local authority areas, providing capacity for local authorities that have had to reduce or disband their in-house tenancy-relations service because of financial constraints.
 - Since 2022, Safer Renting has seen more referrals from existing local authority partners; and expanded its scope to new partner boroughs. In addition to the increasing number of reported offences, this rise in referrals underpins the need for growth in Safer Renting's capacity.
- 1.7. In 2022-23, Safer Renting supported 1,271 people (an increase from 625 in 2021-22 and 414 in 2020-21) across 11 London boroughs (up from six boroughs in 2021-22). In 2022-23, Safer Renting secured £195,317 in legal compensation or out of court settlements for their clients (£118,000 in 2021-22 and 136,000 in 2020-21).⁵
 - 1.8. A significant proportion of Safer Renting's work includes providing specialist advice and support to protect renters from illegal eviction and harassment by rogue landlords; and the associated criminal behaviour to evict unlawfully, such as assault and use of force or violence to gain entry. This outreach service includes informing both tenants and landlords of their legal rights and responsibilities; and agreeing joint actions. Safer Renting can also negotiate with the landlord on behalf of the renter to prevent an illegal eviction.⁶ Safer Renting works closely with the Metropolitan Police Service (MPS) and boroughs to uphold compliance with the Protection from Eviction Act (1977) and the Criminal Law Act (1977). Safer Renting also supports renters to make a claim against the landlord and access redress, where appropriate. Safer Renting will seek to uphold the tenant's rights; provide support to navigate the court and First Tier Tribunal systems; and help in finding a lawyer and accessing Legal Aid, where it is available. Such support may include securing compensation; obtaining a rent repayment order; and/or obtaining an injunction to prevent a particular action from happening.
 - 1.9. In addition, Safer Renting delivers training to frontline MPS officers on how to deal with unlawful behaviour by landlords. More than 7,000 officers have received this training to date. To mitigate the risk that frontline MPS officers wrongly support landlords to facilitate an illegal eviction, the GLA convened a working party – with Safer Renting, Generation Rent and the MPS – to review and update guidance for officers.⁷ Boroughs and MPS officers play a key role in tackling illegal evictions, so it is vital they have the training, knowledge, skills and confidence required to do so.
 - 1.10. The Safer Renting proposal is a good-value intervention. It increases the Safer Renting programme's capacity to support Londoners at risk of illegal eviction and homelessness.
 - 1.11. This grant will be made in accordance with the GLA's Contracts and Funding Code.⁸

Better Renting programme

- 1.12. The Better Renting programme is funded by the Mayor. In November 2019, [MD2547](#) approved Better Renting expenditure. The programme facilitates nine training opportunities to support boroughs' capacity for enforcement. Recent upskilling training for borough enforcement officers includes addressing damp and mould; and tackling harassment and illegal eviction. After a competitive process, Safer Renting was one of the providers chosen to deliver training under the Better Renting programme.
- 1.13. Various organisations provide upskilling training, depending on the need identified. For example, in 2023 Upkeep Training delivered damp, mould and remediation training to over 70 officers. Also in 2023, Safer Renting delivered training on tackling harassment and illegal eviction to almost 100 officers over four sessions. Feedback for this training was strong, and demand is consistently high.

⁵ Cambridge House, [Annual Report and Accounts 2022-23](#)

⁶ Safer Renting, [Safer renting](#)

⁷ Guardian, [Met officers to be told to arrest landlords who try to illegally evict tenants](#), August 2023

⁸ GLA, [Contracts and Funding Code](#)

- 1.14. In total, nearly 400 housing and environmental health officers have been trained under the Better Renting programme.
- 1.15. It has been shaped by involvement from the Mayor's Private Rented Sector (PRS) Partnership, whose members have been critical in informing and shaping the Mayor's services, including identifying training needs. Launched in 2017, the Partnership is made up of the PRS lead for each London borough to share intelligence and best practice; and develop initiatives to improve standards and conditions for renters.

2. Objectives and expected outcomes

- 2.1. The objectives relating to the Safer Renting recommendation are:
 - tenancy sustainment, by enabling renters to stay in their homes for longer
 - homelessness prevention, particularly by intervening in illegal evictions
 - improving standards and conditions in the PRS
 - enabling renters to promptly access the right redress, where appropriate.
- 2.2. The main outcome is that Safer Renting will have more capacity to manage casework, and provide the necessary support to renters at the earliest opportunity.
- 2.3. The objectives relating to the Better Renting recommendation are to:
 - increase the capacity, skills and knowledge of enforcement officers to enable London boroughs to take more action against rogue landlords
 - improve standards and conditions in the PRS
 - increase sector-wide learning and networking to continually improve services.
- 2.4. The main outcomes are:
 - more borough officers can access upskilling training
 - an enhanced training offer, allowing boroughs to access a wider range of training opportunities that meet their needs.

3. Equality comments

- 3.1. Under section 149 of the Equality Act 2010, the Mayor and GLA are subject to the public sector equality duty (PSED) and must have 'due regard' to the need to eliminate unlawful discrimination, harassment and victimisation; and advance equality of opportunity, and foster good relations, between people who share a relevant protected characteristic and those who do not.
- 3.2. Protected characteristics under section 149 of the Equality Act are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage or civil partnership status.
- 3.3. It is expected that both recommendations will have a positive impact on those with a protected characteristic under the Equality Act. This will make strides towards addressing structural inequalities associated with poor-quality housing, overcrowding and housing insecurity. Both recommendations relate to London's PRS, and have the shared objective of improving standards and conditions. The main impacts, in this regard, are as follows:

- Age: The number of older people living in the PRS is growing. Between 2009 and 2019, London's private renters aged 40 and over almost doubled from around 290,000 to around 570,000; and those aged 65 and over increased from around 50,000 to around 80,000.⁹
- Race: Black and Asian households in the PRS are particularly likely to live in 'non-decent' homes.¹⁰ Black households in London are significantly likelier than those of other ethnicities to report moving because their landlord ended the tenancy or evicted them; and likelier than people of other races to say they expect to be treated worse by private landlords.¹¹

3.4. This funding will enhance Safer Renting's capacity to engage vulnerable renters; and support them to understand and uphold their tenancy rights and prevent homelessness.

3.5. Safer Renting has committed, via its service charter, to embed equality, diversity and inclusion into service delivery by:

- facilitating different service-entry pathways to meet different levels of skill, capability and confidence
- promoting services in accessible, non-stigmatising and non-threatening ways
- providing safe spaces that are inclusive, non-judgemental, uplifting, respectful, empathetic, nurturing, warm, challenging and genuine
- using strength-based approaches that focus on service users' skills as their starting point; and supporting people's independence, resilience, ability to make choices and wellbeing
- supporting service users to identify barriers to achieving life goals; and facilitating access to the community-based, statutory or multi-agency services they need to secure positive sustainable outcomes for themselves.

3.6. In addition, Safer Renting's Service User Engagement Strategy aims to extend the reach of its services by seeking to understand the potential barriers to involving users with multiple disadvantages and complex interrelated needs.

4. Other considerations

Risks

4.1. The risks and mitigations are detailed in the table below.

Risk	Rating	Mitigating action
Other providers may be better placed to help meet Mayoral objectives with the GLA's funding	Low	Initial scoping identified Safer Renting as the optimum provider, in terms of its unique direct specialist-support provision in London's illegal evictions space and its established partnerships with boroughs.
Lack of interest and participation from boroughs in an expanded Better Renting programme, which has been in-flight since 2020, which may result in low uptake	Low	The need for a renewed upskilling programme has been driven through the PRS partnership and feedback from the existing programme. GLA officers will continue to consult with boroughs on specific training needs.

⁹ GLA Housing and Land, [Housing Research Note 9: Understanding recent rental trends In London's private rented market](#), June 2023

¹⁰ GLA Housing and Land, [Housing Research Note 8: Housing and race equality in London: An analysis of secondary data](#), March 2022

¹¹ Ibid

Links to Mayoral strategies and priorities

- 4.2. Improving conditions in the PRS, tackling rogue landlords and making renting safer are amongst the Mayor's priorities. The London Housing Strategy sets out the Mayor's ambitions for improving standards for private renters; and states that private renters should benefit from decent property standards and management practice across the system. This proposal supports the Mayor's objectives, set out in the latest London Housing Strategy, to improve standards and security for private renters.¹² The specific proposals in the strategy are:
- the Mayor will encourage consistently good standards in London's private rented sector by enabling councils to make better use of their powers
 - the Mayor will work with councils and the government to target enforcement resources against the minority of poor quality and criminal landlords.

Consultations

- 4.3. These proposals were developed in consultation with the Mayor's PRS Partnership and through feedback received via delivery of the Better Renting programme.

Conflicts of interest

- 4.4. No one involved in the drafting of this report has any relevant conflicts of interest to declare.

5. Financial comments

- 5.1. The Executive Director of Housing and Land's approval is sought for expenditure up to £90,000. Of this, up to £60,000 will grant fund Cambridge House to expand the delivery of the Safer Renting programme, increasing the reach and scope of their activities to support London's private renters at risk of, or experiencing, illegal eviction. The remaining £30,000 will be used to procure training from external organisations, which extends the GLA's existing upskilling training offer (including on illegal eviction and harassment) to PRS enforcement officers as part of the Mayor's PRS Partnership/Better Renting work. This funding is expected to be paid in 2023-24, and to be funded from existing 2023-24 budgets.

6. Legal comments

- 6.1. Under section 30(1) of the Greater London Authority Act 1999 (the GLA Act), the GLA has a general power to do anything that it considers will further one or more of the principal purposes of the GLA. The principal purposes, as set out in section 30(2) of the GLA Act are:
- promoting economic development and wealth creation in Greater London
 - promoting social development in Greater London
 - promoting the improvement of the environment in Greater London.
- 6.2. It is open to the GLA to take the view that the funding proposed in this report will promote social development in Greater London; and is therefore within its power contained in section 30(1) of the GLA Act.
- 6.3. In determining whether or how to exercise the power conferred by section 30(1) of the GLA Act, the GLA must:

¹² GLA, London Housing Strategy, [London Housing Strategy](#), May 2018

- have regard to the effect that its decision will have on: the health of persons in Greater London; health inequalities between persons living in Greater London; the achievement of sustainable development in the United Kingdom; and climate change and its consequences (sections 30(3-5) of the GLA Act)
- pay due regard to the principle that there should be equality of opportunity for all people (section 33 of the GLA Act).

- 6.4. In taking the decisions requested, the GLA must also have due regard to the PSED – namely the need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act 2010; and to advance equality of opportunity, and foster good relations, between persons who share a relevant protected characteristic (race, disability, sex, age, sexual orientation, religion or belief, pregnancy and maternity, and gender reassignment) and persons who do not (section 149 of the Equality Act 2010).
- 6.5. In respect of paragraphs 6.3 and 6.4, regard should be had to section 3, above.
- 6.6. In addition to the above, where the GLA is proposing to use the power conferred in section 30(1) of the GLA Act, the GLA must consider consulting in accordance with section 32 of the GLA Act (see paragraph 4.2, above).
- 6.7. To mitigate any risks that proposed funding might be considered unlawful subsidy, officers should work with Legal to consider the structure and detail of proposed funding arrangements.
- 6.8. The award of GLA grant funding to Cambridge House (Safer Renting) is not a payment for services, and is not therefore subject to the requirements of the Public Contracts Regulations 2015. This notwithstanding, the GLA remains subject to the overarching duties of fairness and transparency. Officers must ensure that the funding is distributed fairly, transparently, in accordance with the GLA's equalities duties, and in a manner that affords value for money in accordance with the GLA's Contracts and Funding Code.
- 6.9. With regard to the procurement of training services, through the Better Renting programme, officers must comply with the GLA's Contracts and Funding Code when undertaking the programme-related procurements. Furthermore, officers must put in place an appropriate agreement between the relevant service provider(s) and the GLA before the training services commence.

7. Planned delivery approach and next steps

- 7.1. The project will be delivered according to the following timetable:

Activity	Timeline
Safer Renting	
Signing of grant agreement with Safer Renting	February 2024
Announcement	March 2024
Delivery start date	March 2024
Delivery end date	March 2025
Better Renting (internal)	
Procurement and delivery of training from external organisations	From February 2024, ad hoc throughout 2024-25 to respond to borough demands

Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FoIA) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary. **Note:** This form (Part 1) will be published either within one working day after it has been approved or on the defer date.

Part 1 – Deferral

Is the publication of Part 1 of this approval to be deferred? YES

If YES, for what reason: project not a certainty until grant agreement is signed

Until what date: Signing of grant agreement with Safer Renting. April 2024.

Part 2 – Sensitive information

Only the facts or advice that would be exempt from disclosure under the FoIA should be included in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a part 2 form? NO

ORIGINATING OFFICER DECLARATION:

Drafting officer to confirm the following (✓)

Drafting officer:

Calum Davidson has drafted this report in accordance with GLA procedures and confirms the following:

✓

Assistant Director/Head of Service:

Natalie Daniels has reviewed the documentation and is satisfied for it to be referred to the Sponsoring Director for approval.

✓

Financial and Legal advice:

The Finance and Legal teams have commented on this proposal, and this decision reflects their comments.

✓

Corporate Investment Board

A summary of this decision was reviewed by the Corporate Investment Board on 19 February 2024.

✓

INTERIM CHIEF FINANCE OFFICER:

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

Signature:



Date:

22/02/2024