



Houses in Multiple Occupation Strategy

July 2004

Contents	Page
SECTION 1: THE CONTEXT	3
SECTION 2: THE STRATEGY	8
SECTION 3: ACTION PLAN 2004-2006	16
ANNEX: LIST OF CONTACTS (to be inserted)	23

SECTION 1: THE CONTEXT

The Legislative Framework

Two pieces of legislation underpin our approach to Houses in Multiple Occupation (HMOs) in Clackmannanshire, and the content of this strategy:

- The HMO Licensing Order 2000, under the Civic Government (Scotland) Act 1982 made it mandatory from 1st October 2000 for local authorities to establish an HMO licensing scheme and for all qualifying HMOs¹ to be licensed. All HMO owners must apply for and obtain a licence, in accordance with the provisions of the Order and the local licensing standards set by each authority. The national framework allowed authorities to introduce their local schemes in stages and from 1st October 2003, all HMOs with 3 or more qualifying persons from more than 2 families required a licence to continue to operate.
- More generally, the Housing (Scotland) 2001 Act requires local authorities to undertake a comprehensive assessment of housing needs and conditions, and to produce strategies to tackle the housing problems in their areas. HMOs are an integral part of the Clackmannanshire housing system. The Act also requires local authorities to carry out an assessment of homelessness in their area and to produce a homelessness strategy

Our HMO strategy is designed to meet our statutory licensing obligations, while ensuring that the HMO sector continues to play a valuable role in providing housing within Clackmannanshire, particularly where this involves vulnerable people.

Homelessness and Housing Strategies in Clackmannanshire

The Council is currently updating its Homelessness Strategy. It will be published in Summer 2004. We will ensure the HMO strategy remains consistent with this.

The Clackmannanshire Local Housing Strategy 2004-2009 (LHS) indicates there are around 40-50 HMOs in Clackmannanshire, providing accommodation for around 150-250 people.

HMOs can occur in any tenure. However, most HMO properties, and those most likely to give some cause for concern, are likely to be found in the private rental sector. The LHS records 5% of homes in Clackmannanshire as in the private rental sector (around 1000 properties). It notes that the private rental sector in Clackmannanshire is particularly important in housing households moving in response to changing employment or relationship circumstances, and in meeting the needs of certain vulnerable households

The Clackmannanshire LHS concludes that the private rented sector is likely to remain around its current size over the next few years, but notes the existence of a minority of 'rogue' landlords who neglect the management and maintenance of their properties.

Objectives set in the Clackmannanshire LHS that have a bearing on this HMO strategy are:

- **Objective 2:** An additional 20% of privately owned or rented housing attaining or exceeding the Scottish Housing Quality Standard² by 2009

¹ It can sometimes be unclear whether a property should be considered to be an HMO for licensing purposes. We discuss what should be taken into account in this regard on pages 5 and 6 of this document.

² A new quality standard defined by the Scottish Executive that social rented accommodation must meet as soon as possible and that authorities should promote in the private housing sector

- **Objective 4:** All private rented housing in Clackmannanshire meeting minimum Council specified physical standards and managed to minimum Council specified quality standards by 2009
- **Objective 9:** Reduction in the future incidence of homelessness in Clackmannanshire through adoption of preventative measures

The LHS identifies a set of planned actions to be undertaken to achieve these objectives. Six of these have a potentially important bearing on the implementation of our HMO Strategy and have been taken into account:

- Using possible new powers³ to require owners to improve their properties
- Using Private Sector Housing Grant, targeted on private residential properties in the worst condition
- Establishing a Private Landlords Forum
- Implementing a code of management practice for private sector landlords
- Developing and publishing a best practice guide to letting and renting property in the private sector
- Updating Clackmannanshire's HMO Licensing Scheme

The Overall Aims of the HMO Strategy

While the main emphasis of this strategy focuses on private sector HMOs, we must ensure that acceptable standards are achieved in the non-profit, social rented sector as well as the private rented sector. We have developed this strategy aware that, in the final analysis, HMO licensing is about - and is for - the residents who live in shared accommodation across all tenures.

We also acknowledge that while private HMOs in Clackmannanshire form a very small part of the housing market, they are important for those who, through necessity or choice, live in this sector.

We therefore see our HMO strategy as having two key drivers:

- **Regulation** through licensing and other powers to improve the quality of current shared accommodation and to eliminate poor property and management standards
- **Promotion and support** to protect supply levels and enhance opportunities for expansion in the supply of good quality shared accommodation, particularly in the private rented sector

The overall aims of our HMO strategy are therefore to:

- Meet our legislative obligations for HMO Licensing under the Civic Government (Scotland) Act 1982
- Raise HMO property standards to acceptable levels of safety and quality

³ Arising from anticipated new private sector housing legislation

- Encourage greater professional tenancy and property management standards by HMO landlords
- Inform HMO tenants of what they can expect as minimum standards of housing and management, and what they can do if these are not being met
- Support the retention of a well managed, good quality, private HMO market and encourage its expansion where appropriate

Principles Underlying the HMO Strategy

The core of our strategy towards the HMO sector is based on the operation of an appropriate and effective licensing scheme. That scheme, described below, is based on the following broad principles:

- Council regulation of the sector must not impose undue or unreasonable burdens on landlords, yet ensure tenants live in safe and satisfactory accommodation
- The licensing scheme must be clear to those affected by it, being well publicised, understandable, fair and contain effective complaints and appeals procedures
- The various services of the Council involved in running the licensing scheme must work together and must apply it consistently to different landlords
- The licensing scheme must be as simple and as user friendly as possible
- The licensing scheme should be reviewed on a regular basis

We will adopt a corporate approach within the Council, and make engagement with the scheme as straightforward for landlords and tenants as possible.

The Clackmannanshire HMO Licensing Scheme

The Council's mandatory HMO Licensing Scheme is established under the Civic Government (Scotland) Act 1982 (Licensing of Houses in Multiple Occupation) Order 2000.

What happens when we receive a licence application is shown in Figure 1.

All landlords (ie **owners**) of HMOs that meet the eligibility criteria for licensing must by law apply for and acquire a licence to operate, and renew this on a regular basis. The requirement applies to HMO owners in the public, voluntary and private rented sectors. HMOs can take many forms in terms of types of properties and types of residents but all involve shared accommodation. Common types of HMOs include a shared flat or house, a set of bedsits, a bed and breakfast establishment, a hostel, supported accommodation projects and student halls of residence.

The Council's Environmental Health Services provides detailed advice where required on the definition of an HMO for licensing purposes and on the duty of different types of HMO owners to apply for a licence but, in general terms, a licensable HMO must be:

- The principal or only home of the residents (this includes students' term time rented accommodation)

Clackmannanshire Council HMO Strategy

- Occupied by residents who are not all from one or two families (ie the minimum threshold for licensing is 3 persons who do not form one or two families)

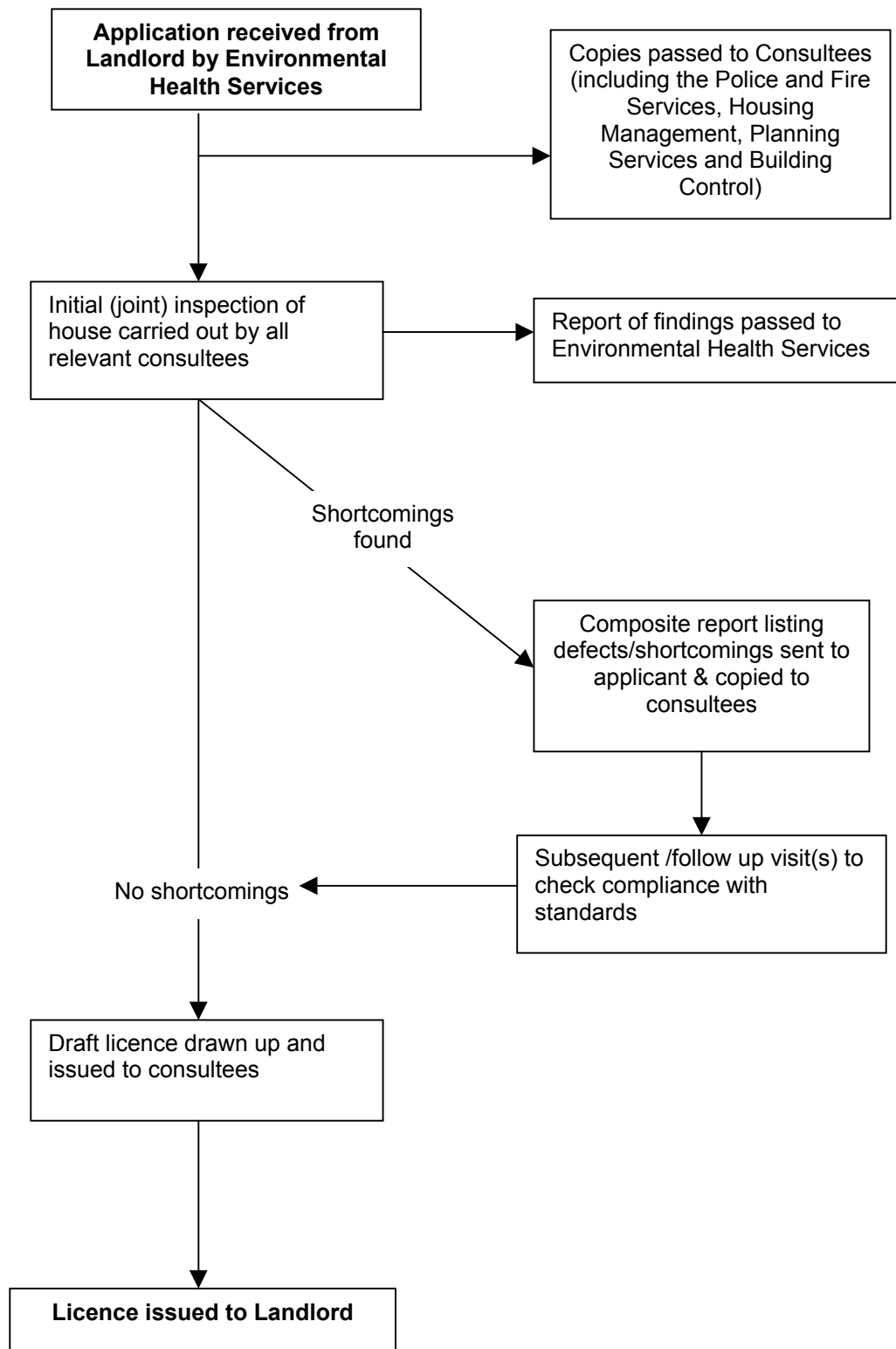
The statutory framework is quite all embracing but there are a number of exemptions, the most common of which are:

- HMOs that are regulated by the Scottish Commission for the Regulation of Care ('The Care Commission'). This includes residential care homes, nursing homes, boarding accommodation linked to schools, and secure accommodation for children. Note that other types of shared accommodation for which a Housing Support Service is provided are *not* exempt from licensing
- Properties occupied by persons from different families who are joint owners and, co-operative housing associations
- Houses with a resident landlord and 2 lodgers
- HMOs owned by the Crown.

The position of **letting agents** should also be noted as it has changed since the original Order was issued in 2000. If someone other than the owner carries out the day-to-day management of the property, that person or company will be named on the licence as a joint licence-holder. Letting agents or property managers should check that their clients are licensed where necessary. It is now a criminal offence for anyone to act as an agent for the owner of a licensable HMO who does not hold a licence, by doing anything "*which directly permits or facilitates the occupation of that house*". Again, Council officers can advise agents about the interpretation of this issue where required, but it is normally related to signing up tenants, taking rents and/or dealing with repairs and maintenance.

The Clackmannanshire licensing scheme should operate as part of a broader strategy for HMOs. The following section explains what this broader strategy entails.

Figure 1: Gaining a Licence to operate a House in Multiple Occupation in Clackmannanshire



SECTION 2: THE STRATEGY

Our HMO Strategy translates our aims into strategic objectives, and these objectives into operational tasks and actions. In this section, we set out our operational objectives and the series of practical actions and tasks by which we expect each objective to be realised. We have grouped related objectives within stages of implementation. While there is a sequential logic to a number of the stages, this has its limits and we will address some stages simultaneously as implementation unfolds.

Key HMO Strategy Elements

A Monitoring procedure is essential from the outset, in order to track and review our progress and efficiency. We will establish a performance review procedure commensurate with the scale of our HMO sector

Establishing **Co-ordination** is also necessary from the outset, in terms of good internal (and external) professional working relationships to implement the strategy.

Information, Communication and Publicity is then needed to raise awareness in the private rented sector about both the strategy and the HMO licensing imperative.

HMO Identification is the follow up to our publicity effort; by adopting a proactive approach to seek out HMOs we will advise and encourage the owners of HMOs that are eligible but unlicensed, to make application.

Compliance with Standards is at the heart of the licensing process to ensure that HMOs subject of an application attain the property and tenancy management standards set by the Council for obtaining a licence; we will also initiate enforcement action including prosecution of HMO owners who wilfully evade licensing.

Funding is a potential source of support that may be available to assist HMO owners to attain the required standards; administration costs are also an issue and the Council needs, as best as possible, to set fees that are equitable to both the Council and applicants.

Advice and Support has to be planned and resourced from an early point to help private tenants appreciate how the licensing process will affect them and to ensure that they are aware of both their rights and responsibilities; support is also needed to ensure HMO landlords address and do not ignore any anti-social behaviour by their tenants.

We now consider each element in turn.

Monitoring

Objective 1. Establish key Performance Indicators (PIs) to monitor the efficiency and effectiveness of the licensing scheme.

Action

We already capture HMO data on a corporate database, and have a target for licensing 31 HMOs by April 2005. We have established a further set of key PIs and specific targets. We will use these PIs to monitor our progress.

In assessing our performance, a number of inputs from different Council services and from Central Region Fire Brigade and Police are necessary before a decision on a licence application is possible. While the time that applicants take to carry out their responsibilities to meet our standards is also an important factor, **the 'turn-around' times for the delivery of the various inputs from Council services is critical to the Council delivering an efficient service to applicants.**

Whether or not an applicant needs to apply for planning consent or needs to apply for a Building Warrant and carry out the works under the Warrant, are particularly important issues in shaping the likely timescale involved in providing a final licence decision.

Time Efficiency

- Average time from date of application (with all necessary documentation) to date of agreed joint inspection: no longer than 2 weeks
- Average time from inspection to date of licence approval where:
 - No Building Warrant or Planning Consent is required: no longer than 13 weeks
 - A Building Warrant and or Planning Consent is required: no longer than 26 weeks
- All newly identified licensable HMOs advised to apply for licences within 4 weeks of being identified

Volume of Activity

- 75% of all identified licensable HMOs licensed by April 2005
- 95% of all identified licensable HMOs licensed by April 2006
- No less than 95% of licensable HMOs licensed from April 2006 onwards

Quality of Service

Annually (in March), we will request feedback from HMO owners and tenants on satisfaction with the information they have received, and the helpfulness and courtesy of the Council in dealing with their applications and queries. Someone independent of those engaged in regular dealings with HMO tenants and owners will conduct this regular exercise to ensure impartiality. We will publish the results annually (in June) on the Clacks Website. The PI will be to achieve at least 75% of owners/tenants 'fully satisfied' with their dealings with the Council

Co-ordination

Objective 2. Establish an effective form of joint working within the Council and with external partners to:

- Provide corporate advice on all matters relating to HMOs
- Improve procedures for co-ordination, liaison and information-sharing between services, teams and sections on licensing and wider HMO issues
- Monitor and regularly review Council procedures to ensure a corporate approach to all matters relating to HMOs
- Oversee staffing and training issues for Council staff dealing with HMOs

Actions

Effective liaison between services is essential to deliver the strategy.

Joined Up Policy

To deal with matters of overall policy and action co-ordination, an HMO joint officers group will be convened. The group will not be expected to meet on a frequent basis, but if major problems of inter-service working arise, the lead service, Environmental Health, will be empowered to call ad hoc meetings of the group.

Internal representation will come from Housing, Building Control, Planning, Social Work and Legal Services. Externally, we will look for an input from the Fire Service on fire safety standards and from the Police who have a duty to provide a report on whether HMO owners are 'fit and proper' to hold an HMO licence.

Joined up Delivery

Less formal arrangements will be instigated for co-ordinated action at property/landlord level. The key to the Council achieving its HMO licensing obligations is 'on-the-ground' co-operation for property inspections, agreement on standards in individual properties, clarity on planning consent and efficient delivery of assessment reports. We will achieve these by agreed informal co-ordination by relevant officers.

The variety of types of HMOs and owners justifies decisions on a per property basis by officers about the appropriate type of joint action required. This will allow a flexible response tailored to each case and allow scarce staff resources to be used judiciously. In all cases, Environmental Health officers will take lead responsibility for identifying the appropriate level and type of response to individual HMO properties.

The core 'case' level action is likely to involve Environmental Health, Building Control, Housing Services and the Fire Service. Council based services are committed to ensuring effective joint action to assess property and tenancy management standards – though this does not necessarily mean that Housing Services will have to visit properties. Trading Standards officers will also be involved as they have responsibilities in relation to regulations for fire retardant upholstery and for unfair terms of contracts (the latter involving liaison with Housing Services on the fairness of tenancy agreements). Planning, Legal Services, and Finance (Housing Benefit) are likely to have a more variable input but will provide it efficiently when requested.

Information, Communication and Publicity

Objective 3. Improve the information, publicity and communication channels between the Council and HMO landlords.

Objective 4. Raise awareness amongst HMO tenants and landlords of the Council's HMO Strategy and licensing scheme.

Actions

Information must be accurate before it is communicated. Additional knowledge will be gathered on tenancy agreements (particularly how Notice To Quit applies in HMOs used as temporary accommodation for homeless families) and Occupancy Agreements

Currently there may be HMO owners unaware of their obligation to apply for a licence. We will undertake a number of actions to publicise our approach to HMOs and to encourage tenants and owners of HMOs in Clackmannanshire to contact us.

In our publicity for landlords, we will adopt a positive tone and convey a supportive message about the Council's commitment to a well managed Private Rented Sector in general and HMO sub sector in particular. However, we will also set out the need for compliance where a statutory duty arises.

Our information for HMO tenants will be clear and straightforward. Information will be produced in conjunction with Housing Services and will cover licensing implications and tenancy rights plus information on general housing rights and responsibilities. If appropriate, we will draw on Scottish Executive 'rights' leaflets but supplement them with our own material.

We will communicate and publicise our strategy by:

- Placing notices in the local press regarding HMO licensing requirements.
- Revising our HMO licensing leaflet for landlords
- Producing a leaflet on HMO licensing and related issues for private tenants and ensuring that the leaflet is distributed to as many tenants as possible in the HMOs that we inspect for licensing purposes.
- Placing our HMO Strategy on our website with links to information about the licensing scheme and to the Local Housing Strategy
- Ensuring copies of this strategy and our licensing leaflets are available in libraries, and from Council Offices, the premises of social landlords and from Citizens Advice Bureaux
- Contacting local estate agents and letting agents to seek their assistance to advise their rental clients of our strategy and the licensing scheme
- Encouraging private tenants and landlords of HMOs to contact us through local press and radio announcements.

HMO Identification

- Objective 5** Monitor the scale of HMO activity over time and in particular whether the size of the sector is increasing or reducing.
- Objective 6** Ensure, through corporate activity, that new HMOs are identified as quickly as possible and appropriate action taken to ensure they are licensed.
- Objective 7** Maintain a corporate database of licensed and unlicensed HMOs located within Clackmannanshire.
- Objective 8** Establish an HMO Register as a public document

Actions

We currently hold information on around 20 HMOs operating in Clackmannanshire, and completing the picture is a major priority.

Identification of new HMO's will trigger direct contact from the Council to ensure that the landlord is aware of licensing requirements, and how to apply. We note, and will follow the latest Guidance from the Scottish Executive on identifying HMOs:

“Enquiries from current or prospective tenants, complaints from neighbours and intelligence from other departments or partner agencies who visit the property in the course of their activities can be harnessed to build up a database of possible HMOs for further investigation.”

While there is little evidence of student HMOs in the Clackmannanshire area, we will liaise with Stirling University Student Accommodation Service to ensure we are advised of any possible HMOs it is aware may exist. Additionally, we will ask the Citizen's Advice Bureau (who may receive complaints from tenants who happen to live in an HMO), the Fire Service and letting agents to let us know of any properties that appear to be HMOs.

Local newspaper 'for rent' adverts will be monitored on a regular basis and if we think it is warranted, we may conduct limited street survey work to establish the existence of HMOs we suspect to be operating without a licence.

We will seek access to data held by other services that could assist in identifying HMOs such as Housing Benefit records and the Council Tax Register as well as any data held by Housing, Planning or Building Control that might suggest an HMO. This will be carried out within any constraints of data protection legislation.

We currently capture HMO information on a corporate database, which will be maintained and extended as our knowledge of the sector grows. This database will be used to record all dealings with individual landlords, and provide the basis for issuing reminders for licence reapplication.

We will also use the corporate database to provide the basis for a public HMO register. This register will list all known HMO properties (excluding any Woman's Aid refuges or hostels), the name and address of the property owners, and for each property when a licence was applied for/granted and when reapplication is required. The HMO register, updated quarterly, will be available for inspection by the public at Council Offices, and will be published on the Clacks web site on a quarterly basis.

Compliance with Standards

Objective 9 Carry out initial and subsequent inspections of known HMOs and use all available means (including grants) to ensure standards are maintained.

Objective 10 Establish an effective means of assessing tenancy management standards for licence approval purposes

Actions

Our strategy provides an opportunity for the Council to support the development of a responsible HMO sector in Clackmannanshire. We will do this in the following ways:

Licence Application and Issue

All identified HMO landlords requiring a licence will be invited to apply, and provided with an application pack containing an application form, and details of standards to be met. It will also contain contact details for advice on specific issues. Physical and management standards required for the issue of a licence will be those recommended by the Scottish Executive, including any changes introduced through the current work of an HMO Working Group the Executive has established. Fire safety standards will be those recommended by the Central Scotland Fire Brigade. Details of these standards will also be made available from Council offices in printed form.

Actual physical and fire safety standards will be established on first application for an HMO licence by inspection, carried out jointly by Council (Environmental Health and Building Control) and Fire Service staff. Any required changes to qualify for an HMO licence will be advised within a target time of 4 weeks of inspection, and re-inspection, if necessary, will occur within 2 weeks of being notified by the landlord that the changes have been made.

Standard background checks on landlords applying for an HMO licence will be carried out by the police within an average of 3 weeks of application, and Housing Services will assess management standards within a target time of 3 weeks. Management standards will predominantly be based on assessment of a specimen tenancy agreement the applicant landlord or agent will be required to submit with the application. Current tenants will be contacted directly to make them aware of the licensing process taking place (as advised in the latest HMO Guidance). Housing Services will assess the tenancy agreement and other tenancy management standards.

Initial licences will be for one year. Licensed landlords will be reminded to reapply after a year for a three-year licence. If initial licensing was straightforward, and no subsequent issues (for example tenant or neighbour (justified) complaints against the landlord) have arisen, reapplication will be on the basis of self-verification by a declaration from the licensee. Landlords will complete a form confirming that nothing material has changed since first application, and this together with required certificates (of gas appliance safety for example) will be the basis for licence reissue. In developing the self-verification model we will follow the latest HMO Guidance. A small number of applications will be investigated more fully on a random basis to ensure the system is operating effectively. If there has been a material change between first issue of a licence and subsequent application, a further inspection of the property will be undertaken.

Improvement and Enforcement

An annual report on HMO licensing activity will be submitted to the Private Landlords Forum (once established) and its advice sought on ways to improve the operation of the scheme over time. Securing compliance with the scheme is fundamental. If a landlord fails to meet or comply with licensing requirements, no licence will be issued and if still operating after notification, enforcement action will commence. As a matter of priority, we will clarify exactly what our enforcement options are, taking into account the position of HMO residents. However, all opportunities to support landlords in successfully meeting the requirements will be explored, including, where relevant, eligibility for Private Sector Housing Grant to improve their property to the required standards.

Funding

Objective 11 Ensure as equitable a balance as possible between the costs to the Council of operating the licensing scheme and the fees charged to HMO owners for obtaining a licence.

Objective 12 Use available grant giving powers to support landlords seeking to improve the condition of their HMO properties where required by licensing conditions

Actions

HMO Licence Application Costs

As far as possible, the licensing scheme needs to be self-financing. In practice, given the scale of the HMO sector in Clackmannanshire, this is not feasible. Moreover, it is important to recognise a well functioning HMO sector will reduce the number of households presenting to the Council as homeless or in housing need.

Fees will be scaled so that smaller HMOs pay less than larger HMOs. We will also move to a 3 year renewal period as a norm whereby the fee will reflect the cost of two annual fees rather than three. This 'rebating' reflects the expectation that the Council will be required to provide less input on inspections and administration for renewal applications. Therefore, from September 2004, we will apply the following fee structure:

	First (1 year) Licence Application	3 year Renewal Application
3 occupants	£150	£300
4-6 occupants	£200	£400
7-9 occupants	£350	£700
10 and more occupants	£450	£900

While our intention at the first renewal point is to offer a 3 year renewal licence we reserve the right to only offer a one year renewal (at the same fee as the first year application) to an applicant where we have received consciously misleading or seriously inaccurate information or where the property or the owner has been the subject of justified complaints or investigation by the Council or the police.

These charges will be reviewed annually and revised after consultation with both the Private Landlords Forum, and the Joint Officers Group.

We are conscious that landlords do not necessarily realise the work involved in administering the HMO licensing process (outlined in Figure 1 on page 7), so, as advised in the latest HMO Guidance, we will print a leaflet, making clear all the activities which are involved in operating the system and include this in licence application packs.

Grant Support for Private Landlords

Where possible and appropriate, Clackmannanshire Council will look to support private landlords in improving the physical standards of their properties through Private Sector Housing Grant. In 2004/5 a total of up to £150,000 will be available for this purpose.

Details of qualifying criteria and how to apply for Private Sector Housing Grant (PSHG) will be included in licence application packs.

Operation of the PSHG scheme as it involves HMO landlords will be reviewed regularly through the Private Landlords Forum

Advice and Support

Objective 13 Ensure HMO tenants have access to a basic advice and support service either in-house or in conjunction with the voluntary sector

Objective 14 Help responsible HMO landlords operate effectively through advice and support in dealing with tenants causing problems through anti social behaviour, and through efficient operation of planning procedures, Housing Benefit, and grant administration

Actions

Advice for tenants and landlords

We will ensure that private HMO tenants and landlords have a clear contact and information point within the Council. We will seek agreement for extending the current role of the Council's 'Contact Centre' as a referral-on point to other services to incorporate a basic 'question-answer' service and to dispense HMO leaflets and possibly HMO licence application forms. Other Council access offices will be informed about the HMO Strategy and the licensing scheme.

However, we recognise that, at times, tenants require more than information. They need help. We will examine ways to ensure they have access to advice and support with any problems that arise from our licensing activity.

Additionally, we will discuss with the local Citizens Advice Bureau whether it could act as another point of contact for private HMO tenants and landlords seeking advice on their rights or responsibilities under licensing activity. If this is agreeable, we will brief CAB staff on our licensing work and the expectations in the HMO Strategy.

Advice on best practice for HMO Landlords

We will build upon the commitment in the LHS to develop and publish a best practice guide to letting and renting property in the private sector. We will assist with the inclusion of relevant HMO licence material (eg on property and tenancy management standards) and will support its early production and distribution.

The Private landlord's Forum

We will encourage HMO landlords we deal with in licensing work to participate in the Private Landlords Forum as set out in the Local Housing Strategy.

Where we have identified responsible HMO landlords we will encourage other Council services such as Finance (Housing Benefit), Planning and Housing (Grants Administration) to be as supportive as possible.

Anti-social behaviour

In terms of anti-social behaviour by HMO tenants, we will:

- In conjunction with Housing Services, give HMO landlords specific guidance on how to deal with anti-social behaviour
- Expect landlords to deal with the problem and do so in a lawful manner.

SECTION 3: ACTION PLAN 2004-2006

In this, the final part of the Clackmannanshire HMO strategy we provide a more detailed action plan covering the next 3 years. This identifies when each of the specific actions that collectively constitute the strategy will be undertaken, what resources will be used to achieve this, who is responsible for ensuring it happens, and who else is involved. Achieving the objectives and actions is predicated on the appointment of a support officer within Environmental Services to drive forward the work under the guidance of the Health and Consumer Services Manager, Environmental Services.

The action plan makes absolutely clear what is involved in implementing the Clackmannanshire HMO strategy. We will monitor the performance indicators established for the HMO strategy on an ongoing basis, as already explained. In addition, in April 2006 we will assess the overall impact of the HMO strategy through the Private Landlord Forum. This may involve the appointment of external consultants.

**Clackmannanshire HMO Strategy
Action Plan 2004-5**

MONITORING					
Objective	Action	Timescale	Resources	Lead Responsibility	Others Involved
1: Establish key Performance Indicators (PIs) to monitor the efficiency and effectiveness of the licensing scheme	Baseline information in Place	By September 2004	Internal Staff	EH (Ian Doctor)	Not Applicable
	Customer feedback forms designed and arrangements for conducting exercise agreed	By December 2004	General Fund	EH (Ian Doctor)	Housing Services
	First Customer Feedback survey completed	March 2005	General Fund	tbc	Housing Services
	Results on Clacks web	June 2005, and annually thereafter	Internal Staff	tbc	EH (Ian Doctor)

COORDINATION					
Objective	Action	Timescale	Resources	Lead Responsibility	Others Involved
2: Establish an effective form of joint working within the Council and with external partners	Joint Officers Group convened and remit agreed	September 2004	Internal staffing/external partners	EH (Ian Doctor)	Housing Services Building Control Planning Legal Services Fire Service Police
	Protocols agreed for: <ul style="list-style-type: none"> • Information sharing • Co-ordination of action • Monitoring overall progress 	September 2004	Internal	EH	
	Staff training requirements identified and resourced	September 2004	General Fund	EH	
	Review of progress and resolution of any issues	Annually, from May 2005			

Clackmannanshire Council HMO Strategy

INFORMATION, COMMUNICATION AND PUBLICITY					
Objective	Action	Timescale	Resources	Lead Responsibility	Others Involved
3: Improve the information, publicity and communication channels between the Council and HMO landlords	Place notices in the press re licensing requirements	September 2004	General Fund	Marketing	EH
	Revise and distribute HMO leaflets	November 2004	General Fund	EH	
	Local radio announce-ments re HMO strategy and responsibilities	December 2004	General Fund	Marketing	EH
4: Raise awareness amongst HMO tenants and landlords of the Council's HMO Strategy and licensing scheme	Produce a tenants leaflet and distribute to as many tenants as possible	November 2004	General Fund	Marketing	EH Housing Services
	Contact and distribute HMO material to estate and lettings agents	December 2004	Internal Staffing	EH	
	Distribute HMO material to Libraries, CAB and all landlords	December 2004	General Fund	EH	
	Provide internet access to the strategy and licensing scheme	October 2004	General Fund	EH	

Clackmannanshire Council HMO Strategy

HMO IDENTIFICATION					
Objective	Action	Timescale	Resources	Lead Responsibility	Others Involved
5: Monitor the scale of HMO activity over time and in particular whether the size of the sector is increasing or reducing.	Review of CT and HB databases for new HMO properties	Quarterly, from December 2004	Internal Staff	EH (Ian Doctor)	Housing Services Finance
	Press monitoring for new lettings	Ongoing from July 2004	Internal Staff	EH (Ian Doctor)	
	Press reminders of HMO licensing requirements	Annually from September	General Fund	EH (Ian Doctor)	
6: Ensure, through corporate activity, that new HMOs are identified as quickly as possible and appropriate action taken to ensure they are licensed	Obtain information on possible HMOs from other Council services and from external agencies Written contact to be made with newly identified HMOs, with details of what the landlord needs to do and how to apply for a licence	Contact to be made within 4 weeks of identifying a new HMO property	Internal Staffing	EH (Ian Doctor)	
7: Maintain a corporate database of licensed and unlicensed HMOs located within Clackmannanshire	Keep the FLARE database fully updated as new HMOs are identified and brought into the licensing scheme. Ensure details of contact and subsequent actions (including provision of grants to private landlords) are maintained on the database	Continuous	Internal Staffing	EH (Ian Doctor)	Housing Services
8: Establish an HMO Register as a public document	Make an HMO register available from Council Offices and on the internet	From March 2005, thereafter updated quarterly	Internal Staffing	EH	

Clackmannanshire Council HMO Strategy

COMPLIANCE WITH STANDARDS					
Objective	Action	Timescale	Resources	Lead Responsibility	Others Involved
9: Carry out initial and subsequent inspections of known HMOs and use all available means (including grants) to ensure standards are maintained	Prepare HMO licence application pack (including self certification form for licence re-applications)	To September 2004	Internal Staffing/General Fund	EH	Housing Services Planning Building Control Legal
	Update if required following conclusion of HMO Working Party	Tbc	As above		
	Implement Joint Officer Group Inspection protocol	To September 2004	Internal staffing/Fire Service/Police	EH	
	Deliver annual licensing activity report to Private Landlord Forum, and act on any recommendations arising	Annually, from May 2005	Internally produced report	EH	
10: Establish an effective means of assessing tenancy management standards for licence approval purposes	Implement Housing Service assessment of management agreements	From November 2004	Internal staffing	Housing Services	
	Initiate limited tenant contact on random sample basis	From April 2005	Internal Staffing	Housing Services	

Clackmannanshire Council HMO Strategy

FUNDING					
Objective	Action	Timescale	Resources	Lead Responsibility	Others Involved
11: Ensure as equitable a balance as possible between the costs to the Council of operating the licensing scheme and the fees charged to HMO owners for obtaining a licence	Secure Council agreement to fees for HMO licensing	September 2004 and annually thereafter	Internal Staffing	EH	
	Review fees on an annual basis through the Joint Officers Group and the Private Landlords Forum	September 2004 and annually thereafter	Internal Staffing	EH	
12: Use available grant giving powers to support landlords seeking to improve the condition of their HMO properties where required by licensing conditions	Prepare PSHG information for inclusion in the HMO landlords application pack	To September 2004	Environmental Health	Housing Services	Finance
	Review operation of PSHG for HMO landlords through the Private Sector Landlords Forum	May 2005	Private Landlords Forum	Housing Services	

Clackmannanshire Council HMO Strategy

ADVICE AND SUPPORT					
Objective	Action	Timescale	Resources	Lead Responsibility	Others Involved
13: Ensure HMO tenants have access to a basic advice and support service either in-house or in conjunction with the voluntary sector	Establish a contact point/person for HMO tenant advice within the Council, and publish details in the press and on the internet	December 2004	General Fund/Internal Staffing	EH	Housing Services
	Brief CAB staff on our HMO strategy	December 2004	Internal Staffing	Housing Services	EH
14: Help responsible HMO landlords operate effectively through advice and support in dealing with tenants causing problems through anti social behaviour, and through efficient operation of planning procedures, Housing Benefit, and grant administration	Produce HMO specific material for inclusion in general guide to letting and renting property in the private sector	Tbc	Internal Staffing	Housing Services	EH
	Promote the Private Landlords Forum through inclusion of information on it in the HMO Licence Application Pack	September 2004	Internal Staffing	EH	Housing Services
	Circulate lists of landlords applying for or licensed to provide HMO accommodation to other Council service departments	Quarterly, from September 2004	Internal Staffing	EH	

ANNEX: LIST OF CONTACTS

To be inserted