

## **Residential Enforcement Policies Consultation**

<https://consultation.oxford.gov.uk/regulatory-services-and-community-services/residential-enforcement-policies>

This report was created on Thursday 12 October 2023 at 09:36

The activity ran from 14/09/2023 to 11/10/2023

Responses to this survey: **55**

### **1: What is your name?**

#### **Name**

There were 52 responses to this part of the question.

### **2: What is your email address?**

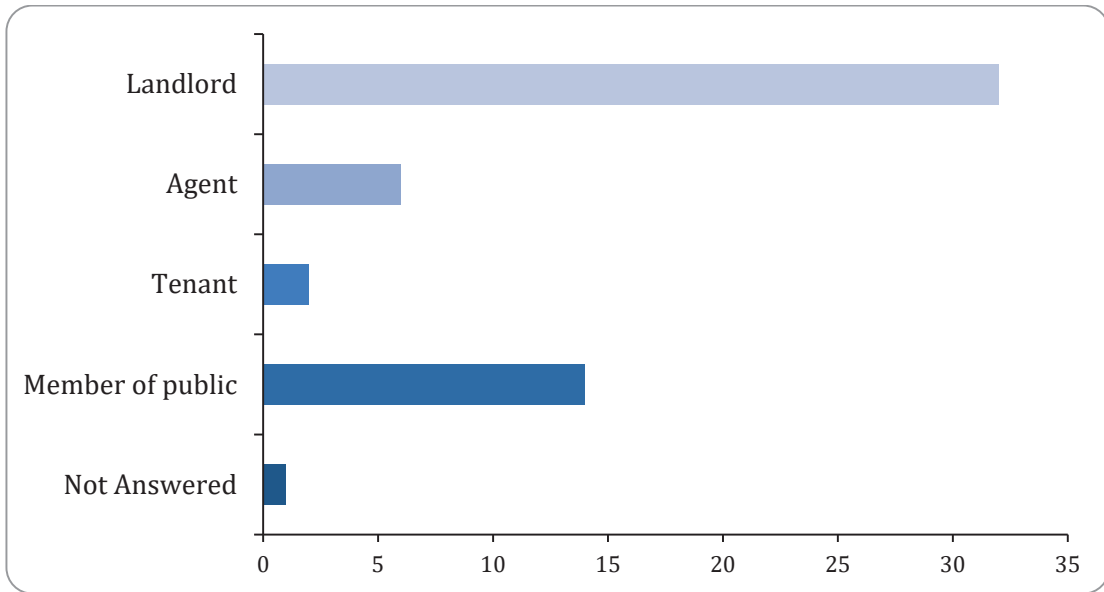
#### **Email**

There were 52 responses to this part of the question.

### **3: What is your interest in private rented properties? interest**

There were 54 responses to this part of the question.

Appendix 4 – Consultation report

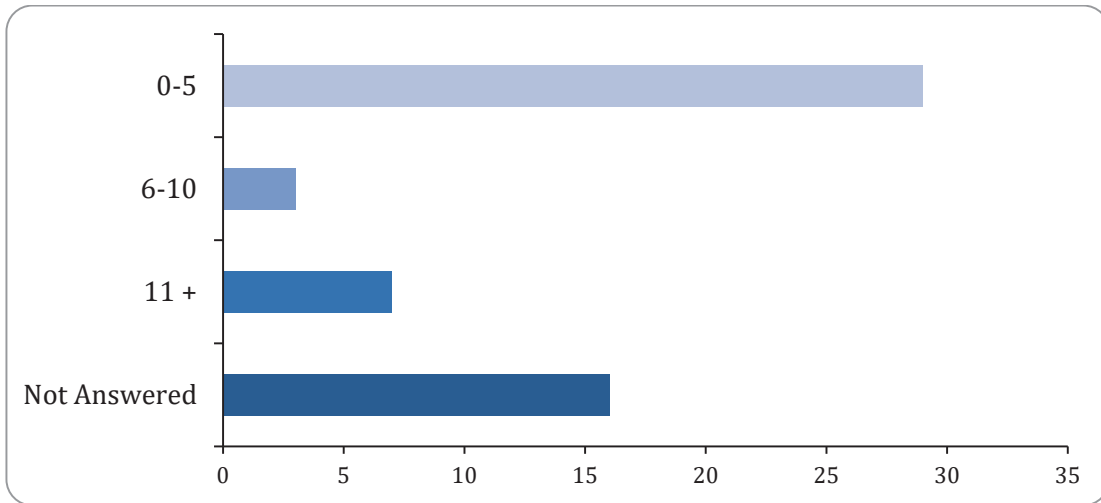


Option	Total	Percent
Landlord	32	58.18%
Agent	6	10.91%
Tenant	2	3.64%
Member of public	14	25.45%
Not Answered	1	1.82%

**4: If you are a landlord or agent, how many privately rented properties do you own / manage within Oxford City?  
number of properties**

There were 39 responses to this part of the question.

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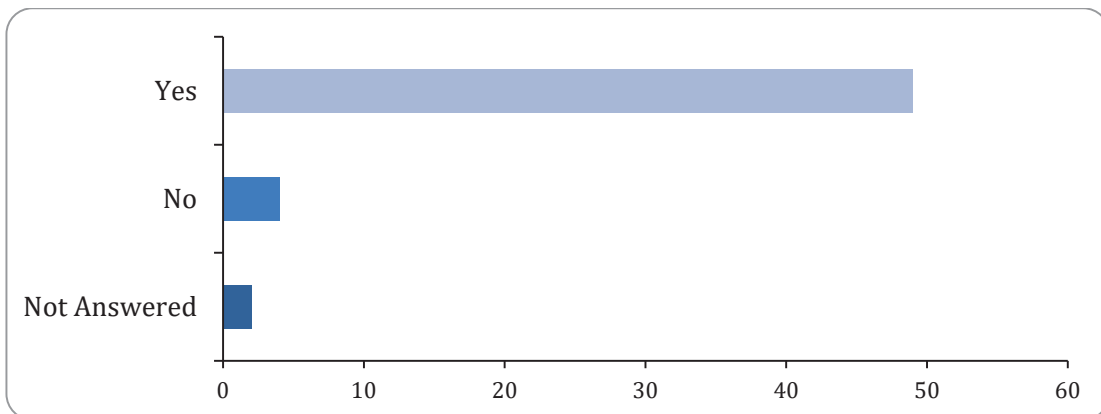


Option	Total	Percent
0-5	29	52.73%
6-10	3	5.45%
11 +	7	12.73%
Not Answered	16	29.09%

**5: Is it useful to have clear enforcement policies?**

**clear policies**

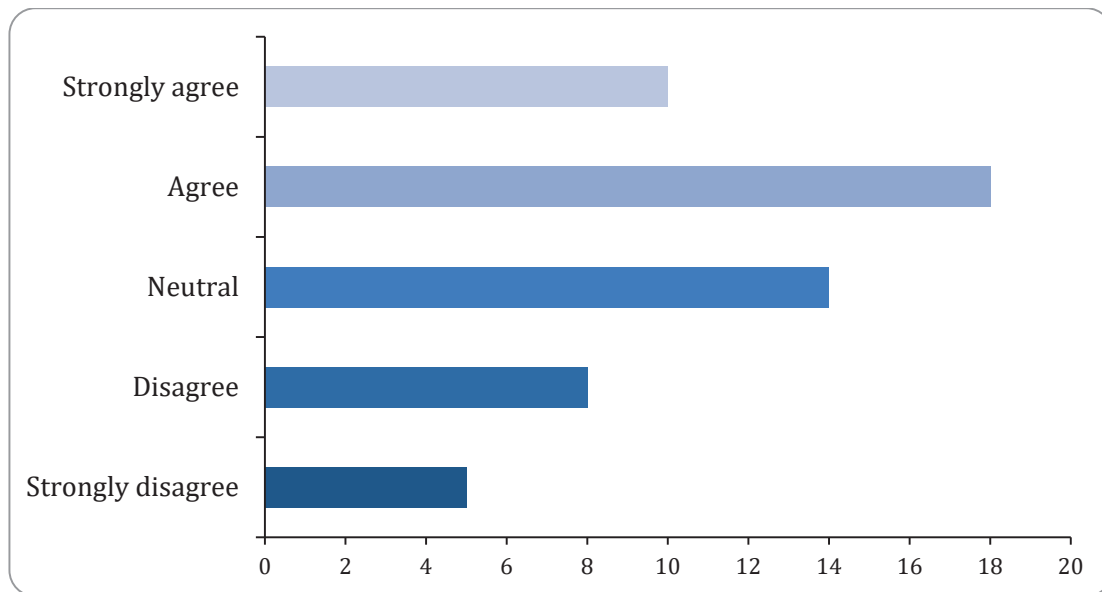
There were 53 responses to this part of the question.



Option	Total	Percent
Yes	49	89.09%
No	4	7.27%
Not Answered	2	3.64%

**6: Is the policy easy to understand?**  
**easy to understand section1**

There were 55 responses to this part of the question.

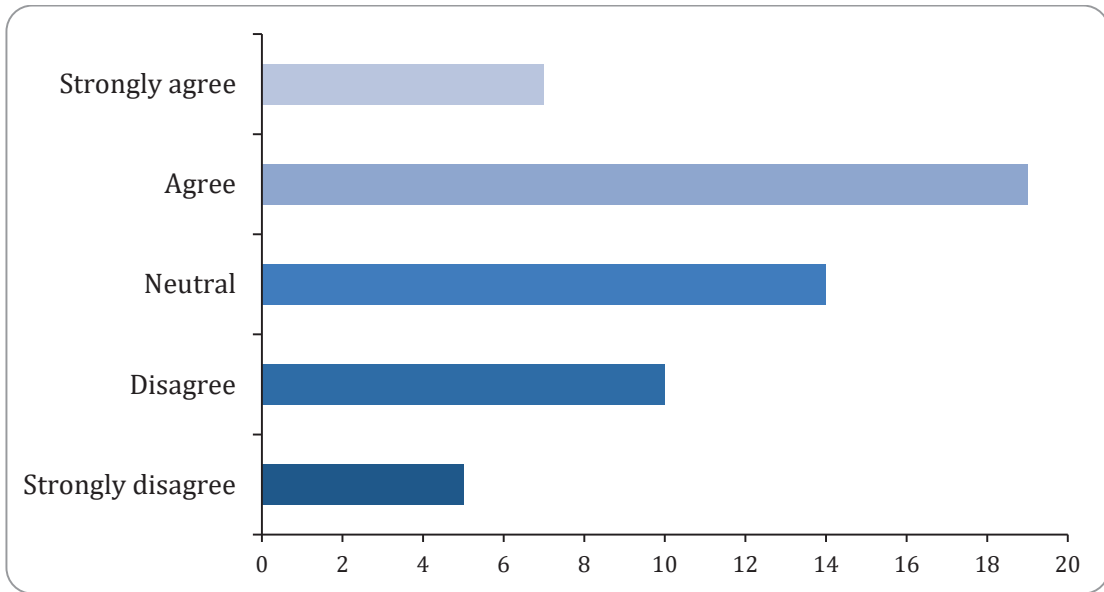


Option	Total	Percent
Strongly agree	10	18.18%
Agree	18	32.73%
Neutral	14	25.45%
Disagree	8	14.55%
Strongly disagree	5	9.09%
Not Answered	0	0.00%

**7: Does the policy explain how the council makes decisions in relation to a person being fit and proper?**  
**clear explanation**

There were 55 responses to this part of the question.

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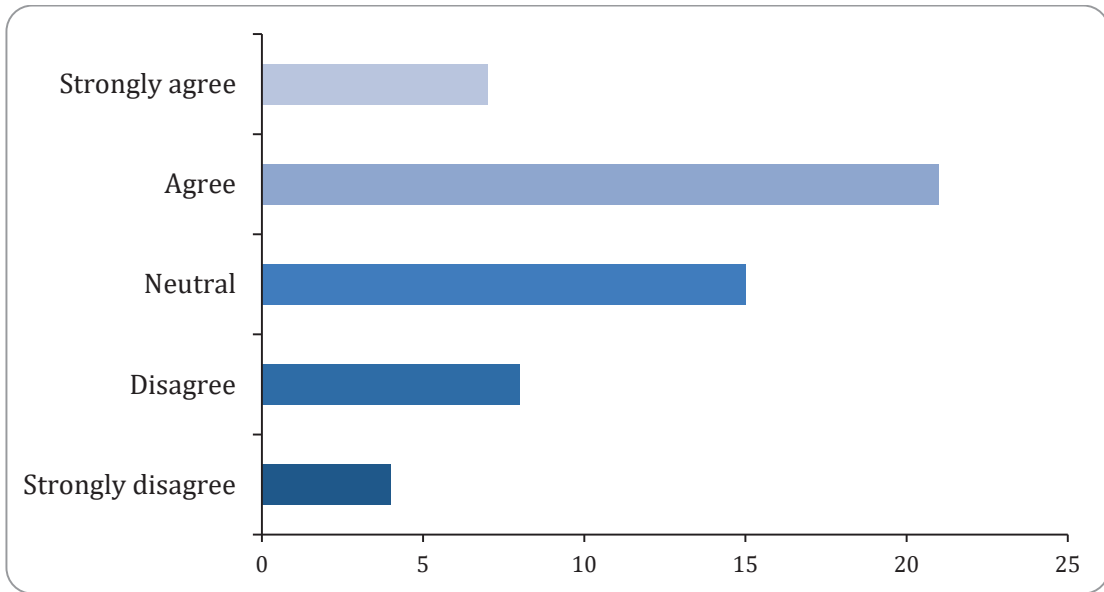


Option	Total	Percent
Strongly agree	7	12.73%
Agree	19	34.55%
Neutral	14	25.45%
Disagree	10	18.18%
Strongly disagree	5	9.09%
Not Answered	0	0.00%

**8: Do you agree with the duration for not being considered a fit and proper person (para 7)?  
duration**

There were 55 responses to this part of the question.

## Appendix 4 – Consultation report



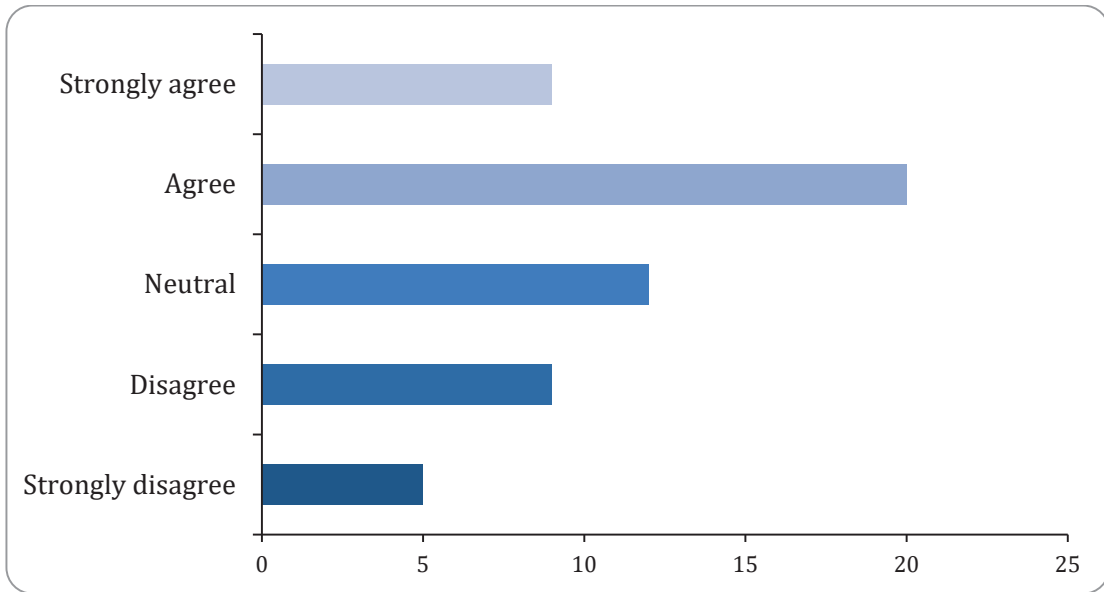
Option	Total	Percent
Strongly agree	7	12.73%
Agree	21	38.18%
Neutral	15	27.27%
Disagree	8	14.55%
Strongly disagree	4	7.27%
Not Answered	0	0.00%

### 9: Is the policy easy to understand?

#### Section 2 - easy to understand

There were 55 responses to this part of the question.

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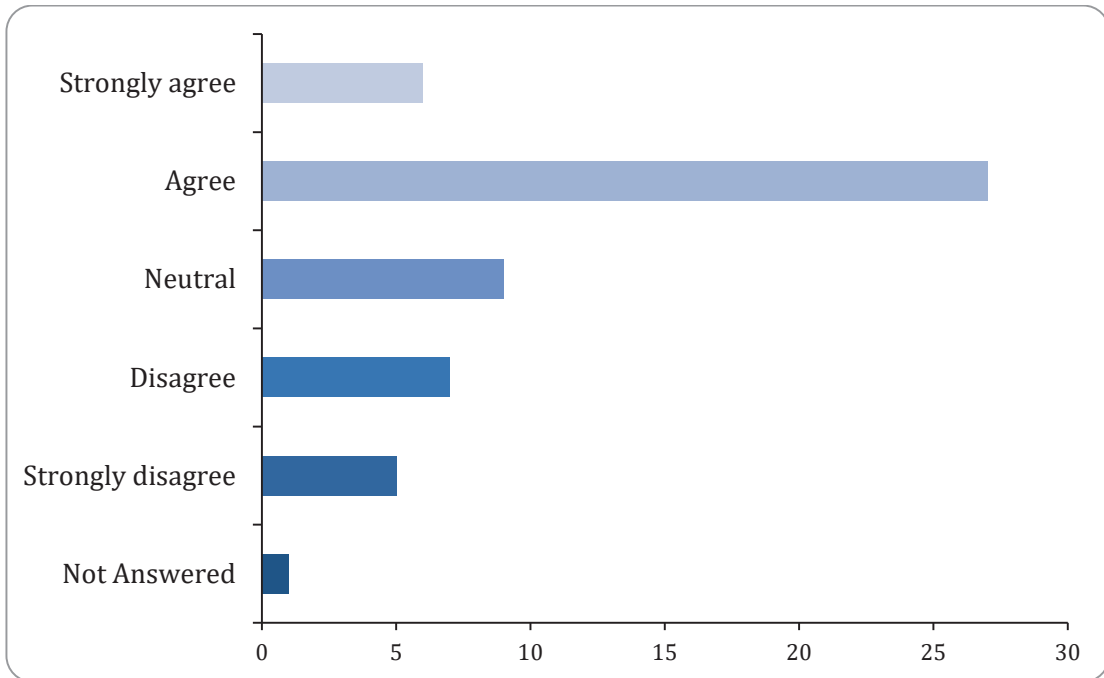
Option	Total	Percent
Strongly agree	9	16.36%
Agree	20	36.36%
Neutral	12	21.82%
Disagree	9	16.36%
Strongly disagree	5	9.09%
Not Answered	0	0.00%

**10: Does the policy explain how the council makes decisions in relation to making an application for a Banning Order and entry onto the RLDB?**

**Section 2 - clear explanation**

There were 54 responses to this part of the question.

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Option	Total	Percent
Strongly agree	6	10.91%
Agree	27	49.09%
Neutral	9	16.36%
Disagree	7	12.73%
Strongly disagree	5	9.09%
Not Answered	1	1.82%

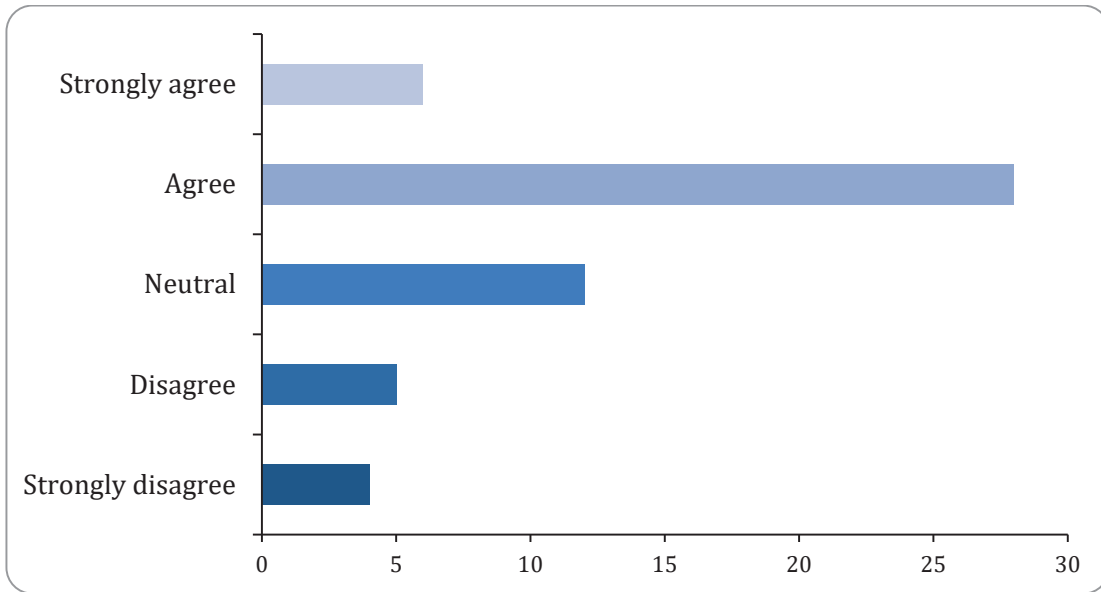
**11: Do you agree with the duration of the maximum length of time a person will remain on the RLDB following 2 financial penalties being issued within 12 months (Para 6.5)?**

**Section 2 - duration**

There were 55 responses to this part of the question.



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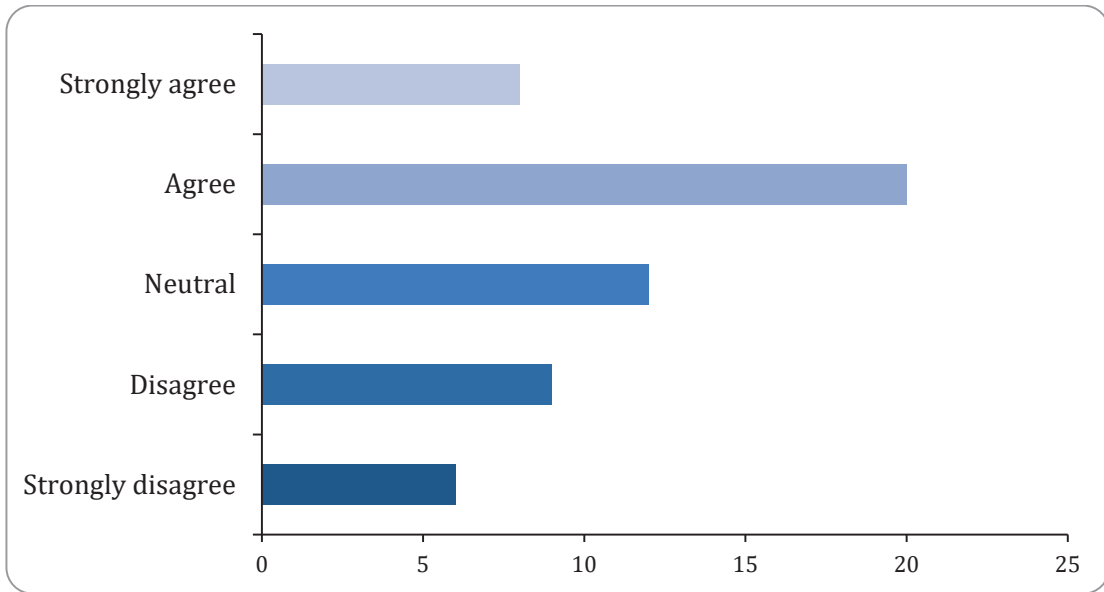
Option	Total	Percent
Strongly agree	6	10.91%
Agree	28	50.91%
Neutral	12	21.82%
Disagree	5	9.09%
Strongly disagree	4	7.27%
Not Answered	0	0.00%

**12: Is the policy easy to understand?**

**Section 3 - easy to understand**

There were 55 responses to this part of the question.

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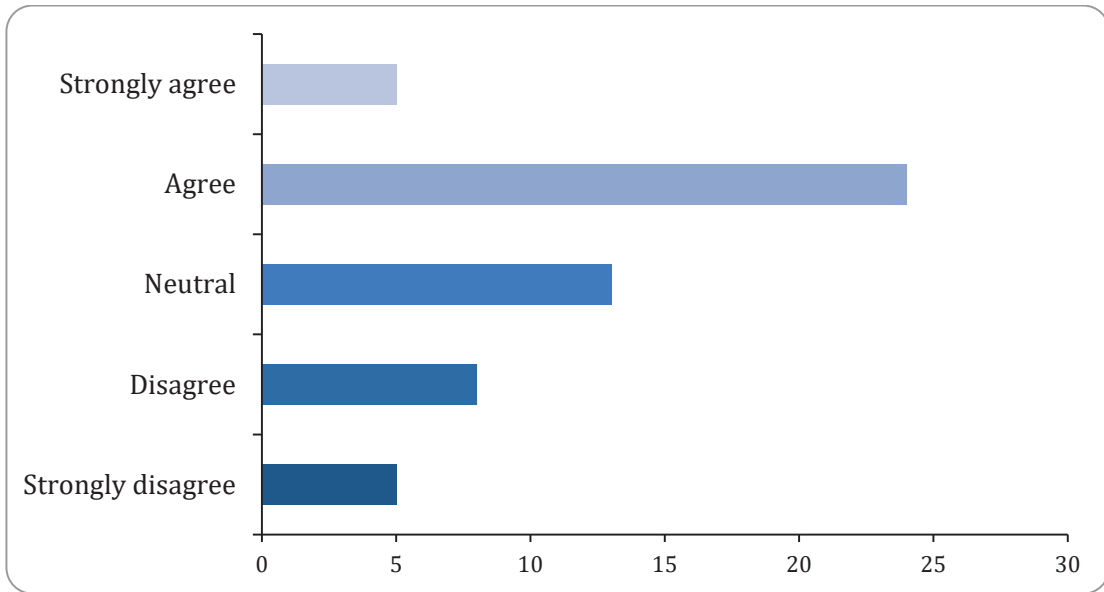
Option	Total	Percent
Strongly agree	8	14.55%
Agree	20	36.36%
Neutral	12	21.82%
Disagree	9	16.36%
Strongly disagree	6	10.91%
Not Answered	0	0.00%

**13: Does the policy explain how the council makes decisions in relation to imposing civil penalties?**

**Section 3 - clear explanation**

There were 55 responses to this part of the question.

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Option	Total	Percent
Strongly agree	5	9.09%
Agree	24	43.64%
Neutral	13	23.64%
Disagree	8	14.55%
Strongly disagree	5	9.09%
Not Answered	0	0.00%

**14: Do you have any other comments about these policies?**

**Please type here if you do.**

There were 39 responses to this part of the question.

**Positive Comments**

	<b>Comment</b>	<b>Response</b>
5	It is a good and much needed policy	Thank you for the positive comments and suggestions.
11	Would not object if the length of bans were extended. Perhaps a quick summary sheet would be easier to read rather than wading through the comprehensive documents?	
12	Excellent	
24	Personally I have no objections to these policies if implemented fairly. They ensure standards are maintained for all parties involved.	
26	I support the intention of these policies to ensure that landlords take responsibility for the quality of their properties and defaulting landlords are held to account.	
28	I think it is very important to make sure that all License holders are "fit and propoer persons" to hold such licenses. Rogue landlords are bad for the reputation of all landlords. I applaud OCC for their efforts in this direction.	
36	Great work, thank you!	

**Comments raising suggestions or concerns about the consultation itself**

	<b>Comment</b>	<b>Response</b>
6	Very difficult to report rogue landlords	<p>The Council has an online form to report problems with rented homes, this can be completed anonymously.  <a href="https://www.oxford.gov.uk/info/20113/houses_in_multiple_occupat ion/978/report_a_hmo">https://www.oxford.gov.uk/info/20113/houses_in_multiple_occupat ion/978/report_a_hmo</a></p> <p>It is acknowledged more promotion for this may be needed.</p>

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1 8	An executive summary in PowerPoint format (with links to the relevant full text) would be useful for those who lack the patience to read so many words.	Acknowledged, will seek to produce a summary
2 9	This is not a consultation. There is nothing here detailing what the current policy is currently and what you are changing. Yes and no is not a consultation	Thank you for the feedback.
3 5	The questions about whether you agree with durations should ask whether they should be longer or shorter. Otherwise the data that x number of people disagree with the length is meaningless as you don't know whether they think it is too long or too short. It would have been helpful to have the sections the questions related to shown (or a link). I had to go and search again to find the policy.	Thank you for the feedback.

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**Comments raising concerns specifically about the policies**

	<b>Comment</b>	<b>Response</b>
1	I understand the reason for the policy, but have no idea about what it will mean or what the rules are, let alone how they will be enforced. Also what is the position of letting agents in relation to landlords, and what happens about old houses, that struggle to meet modern standards, if they even can?	The Council's website includes information on rules. The Council has a webpage on enforcement of housing legislation explain the approach. Letting agents are subject to the same criteria as landlords however the council cannot intervene in landlord-agent disputes (the Agent Redress schemes exist for these disputes). Older houses may require improvement works however some may benefit from exemptions.
2	Rental properties are scarce and it is important that the council works with the landlord to try and make properties available for tenants if at all possible. This should not mean allowing landlords to get away with anything, but the policy should aim if at all possibly, to remedy the situation.	The council has a rent guarantee scheme to work with landlords to make properties available for tenants. The policies are focused on those landlords who do not abide by the rules.

4	<p>The private rental market is brutal in Oxford and landlords have been taking advantage of that for a long time. As a tenant, I am VERY afraid these policies will make the landlords increase even more the rents (that most of us can't afford already).</p>	<p>These policies outline the fines and sanctions for landlords that fail to abide by the rules. The vast majority of landlords abide by the rules and this policy should not affect rent levels.</p>
8	<p>* Lack of Explicit Anti-Discrimination Measures: The document does not explicitly mention measures to ensure that the Fit and Proper Persons Assessment is conducted in a manner that is free from racial, ethnic, or other forms of discrimination. This could disproportionately affect landlords from minority communities.</p> <p>* Ambiguity in "Fit and Proper" Criteria: The criteria for what constitutes a "fit and proper" person are somewhat vague and open to interpretation. This could lead to subjective judgments that may inadvertently target minority landlords.</p> <p>* Mitigating Circumstances: While the document mentions that mitigating circumstances will be considered, it does not specify what these might be. This lack of clarity could lead to inconsistent application of the law, potentially affecting minority landlords more harshly.</p> <p>* Associated Persons' Conduct: The inclusion of the conduct of persons associated with the applicant could be problematic. This could lead to guilt by association, which may disproportionately affect landlords from minority communities where communal living or extended family structures are more common.</p> <p>* Data Sharing with Other Bodies: The sharing of information with other statutory bodies raises concerns about data privacy and the potential for profiling, which could disproportionately affect landlords from minority communities.</p> <p>* Appeal Process: While an appeal process is mentioned, there is no information on how accessible this process is, especially for landlords who may face language or other barriers.</p> <p>* Lack of Transparency: The document does not specify how the Council will ensure transparency in its decision-making process, which is crucial for building trust, especially among minority landlords who may already feel</p>	<p>Thank you for the comments, these have been constructive. The application form for licences does not ask questions on race, religion, sexual orientation. The policy has been amended to include that officers are trained in equalities, unconscious bias and the policy has been subject to an equality impact assessment. Mitigating circumstances are not detailed because this could encourage a "tick box" approach and be unfair.</p>

	<p>targeted.</p> <ul style="list-style-type: none"> <li>* Case-by-Case Basis: While this allows for flexibility, it also opens the door for potential bias or discrimination, especially if the evaluators are not trained in cultural competence.</li> <li>* Severity of Offenses: The document mentions that offenses involving fraud, violence, drugs, or sexual offenses are generally considered to make a person unfit. However, it does not consider the systemic issues that may lead to higher rates of certain types of offenses in minority communities.</li> <li>* No Mention of Training or Oversight: There is no mention of any training for those conducting the assessments to ensure they are free from bias, nor is there mention of any oversight or auditing process to ensure fairness.</li> </ul> <p>Overall, while the document outlines a structured approach to determining a landlord's fitness to hold a license, it lacks specific measures to ensure that this process is equitable and does not disproportionately target landlords from minority communities.</p>	
13	<p>Enforcements should be carried out as last resort, as opposed to be a way to collect money for the Council. We're human being and one mistake should be tolerated. I did receive an oversized penalty for a minor beach but I shouldn't be put in the position of living in constant fear of being considered an 'unfit person'. On the contrary there should be a clear indication on WHEN I'll be able to be pardoned for my mistake (mold in the bathroom). Apologies for venting my frustration.</p>	<p>In line with the general enforcement policy, enforcement is a last resort.</p> <p>Where a person has been assessed as not fit or proper or on the rogue landlord database, they are given a clear indication of when this ends.</p> <p>We cannot comment on specific cases in the consultation.</p>
16	<p>We already have among the highest rents in the whole of Europe right here in Oxford.</p> <p>This is predominantly down to an anti landlord default which justifies charging all landlords penalties just for being landlords - which of course pushes rents up further and leads to landlords selling up in their droves, exasperating the shortage of properties available to rent.</p> <p>Furthermore the local authorities are unable to manage simple services such as council tax (have you tried contacting someone in the council tax office recently?) so just leads to rising costs and incapable management -</p>	<p>The policies only affect those landlords that fail to abide by regulations.</p> <p>The council has no powers over rent control.</p>

	<p>the authorities simple do not posses the expertise.                  The 'rouge' landlords are actually in the vast minority in the country/ city.                  This is simply because being a landlord is a long term investment and if you do not protect that investment (the same as any other investment) it will not earn any money and will actually leave you out of pocket. If you do not maintain a property for example.                  The market itself rats out rouge landlords - if someone views a poorly maintained property covered in mould and windows hanging out etc. they are entirely free not to sign up to a contract - no obligation to justify why not, and totally free of charge.                  Putting an unskilled and expensive middle man in to 'seek out rouge landlords' in the form of yet another council department is a total waste of time and resources and benefits no one.                  We need to learn lessons from continental Europe where landlords are embraced and the benefits of renting (protection from the market, no maintenance costs, flexibility to move etc etc) are used to their advantages with far lower rents and no local authorities messing things up.                  We should learn from our mistakes - The mistake in this case being rents in Oxford are ridiculously too high - totally unnecessarily so</p>	
15	<p>Rogue landlords should be prosecuted, thus prevented from further renting of properties. Especially if their actions can cause their tenants to live in substandard conditions. I do not believe responsible landlords should be forced to go out of pocket when they uphold the law. Licensing fees are better spent in maintaining their properties. I would like to know where this added tax generated from licensing fees goes?</p>	<p>Thank you for the feedback. Penalties are an alternative to prosecution and the worst offenders are more likely to be prosecuted.                  The fees from licensing pays for the administration and enforcement (a contribution towards inspection of licensed homes and finding unlicensed landlords).</p>
20	<p>The policy adopted by the council is wrong as                  i) it does not focus on the few poor landlords but adopts a blanket approach. This means that extra cost and effort are placed upon 'good' landlords and the consequently their tenants. I would much propose a responsive policy where let accommodation was assumed to be satisfactory. Council would act on complaints.                  ii) the ethos in providing letting accommodation is that this becomes a</p>	<p>It is not meant as a blanket approach. The policies have been written to comply with statutory guidance that requires the council to have these policies.</p>



	<p>person's home as though they 'owned' the property. I have to enforce council required tenancy rules despite these going directly against tenant's wishes. This element of 'council knows best' infuriates both my tenants and me.</p> <p>The road to hell is paved with good intentions. This policy and the council's approach is making residential letting 'hell'. I have been letting property for 18 years. I won't be letting property in two years.</p>	
21	<p>The policies are a chaotic mess. Everybody knows that Oxford is awash with rogue landlords. What you need is an anonymous way for members of the public to report their concerns.</p>	<p>Report mechanism already in place  <a href="https://www.oxford.gov.uk/info/20113/houses_in_multiple_occupation/978/report_a_hmo">https://www.oxford.gov.uk/info/20113/houses_in_multiple_occupation/978/report_a_hmo</a></p>
22	<p>If your aim is to improve the quality of life of the population of Oxford, where is your enforcement policy and database regarding anti social behaviour and non payment of rent by tenants ?                  Landlords and tenants are both citizens and should be treated equally.</p>	<p>We cannot enforce against non payment of rent by tenants, this is a civil matter.                  We may be able to enforce against ASB. See  <a href="https://www.oxford.gov.uk/info/20183/anti-social_behaviour/267/anti-social_behaviour">https://www.oxford.gov.uk/info/20183/anti-social_behaviour/267/anti-social_behaviour</a></p>
23	<p>Introducing these policies is all well and good but they need to be applied to all stake holders properties which includes the universities (both Oxford Brookes and Oxford University), the council and the big portfolio landlords who seem to not be targeted for any kind of compliance.</p>	<p>University managed accommodation (halls of residence) are exempt from licensing.                  "Big portfolio" landlords would fall under these policies.</p>
25	<p>The council are very slow to ban/remove poor letting agents but very fast to penalise landlords. We have clear examples where an agent has broken the law, but no action has been taken.</p>	<p>We can only enforce the powers under relevant regulation.                  Landlord – agent relationship is often civil and is covered by the Redress Schemes.                  However, the council will take action against letting agents if they have failed to comply with relevant regulations.</p>
27	<p>Renting a property is a two way street - governed by a legal and binding contract .                  If rogue landlords are to be identified and penalised it is therefore only right and proper to identify and penalise rogue tenants. Could the council please put forward their policy and legal actions and a list of rogue tenants.                  Everyone , apart from the rogue elements on both sides - want better and</p>	<p>The Council has no powers to ban tenants or create a list of rogue tenants.                  .</p>

	improved rental accommodation. For this policy to work we will need an even handed approach.	
31	How does the Council ‘assess every licence application to ensure that the proposed licence holder and where different, the proposed manager, is a fit and proper person to hold a licence and manage the property’? The selective licensing scheme still seems to be running in arrears - there are only 4 properties on my road showing as having licences when there are in fact many with private landlords and if the landlords/managers don’t apply for a licence, what is the process for catching up with them? A neighbouring property has an owner who on paper, lives in Bolton, a manager who appears once in a blue moon, does not yet appear on the list of selective licences (or on the list of HMOs), is not in good repair, was subdivided into 2 flats without planning permission (which was retrospectively refused twice) and a few years ago, was used as a cannabis farm. And yet it seems to be below the radar!	The Council reviews the information provided with the application to identify concerns. The Council has issued licences to almost 70% those that applied by 30 November 2022. Concerns can be reported via <a href="https://www.oxford.gov.uk/info/20113/houses_in_multiple_occupation/978/report_a_hmo">https://www.oxford.gov.uk/info/20113/houses_in_multiple_occupation/978/report_a_hmo</a>
32	They do not describe a situation where a landlord has breached planning permission eg where a parking space has been rented out as a rubbish tip or where they neglect their property so that there are weeds, salts and damp trickling down the external walls, or do nothing to discourage flytipping by their rental property ie undermining the amenity of the local area for residents, for those who work in the area and passers-by. Is such a landlord a fit and proper person to be a landlord? I don't think so but breach of planning and ruining the amenity of the surroundings of a building have not been listed.	Noted – have amended planning permission as an example of housing law. However, an offence (that is a planning enforcement notice) would need to be served to be considered a relevant offence under the policy.
33	Council should educate and assist landlords as banning some landlords will not resolve the problems.	The Council’s Enforcement Policy states action is proportionate. The Civil Penalty Protocol includes low and high enforcement actions demonstrating for less serious cases, education is taken. The Council send out twice yearly newsletters and hold twice yearly landlord forums as assistance and education. The Council has an accreditation scheme, run by a local authority partnership, with online and in person training sessions.

<p>34</p>	<p>It appears to be almost too tough on Landlords, I'm sure they're not all potential law breakers &amp; whilst maintaining standards &amp; certificates are all important, Tenants themselves have to comply &amp; take care of the properties they live in.                  There is a real danger that many private Landlords will give up altogether resulting in less &amp; less property being available.                  I do feel that the area of any health conditions declared by tenants to be the result of their housing conditions needs managed carefully. Some ailments suffered by tenants would be surely difficult to blame on their landlord &amp; indeed would be totally unjustified in many cases.                  One example being 'Migraines'!                  There are very difficult &amp; unpleasant tenants occupying properties &amp; every support should be offered to landlords. How would this be handled?                  The general stance of these proposals does tend to treat landlords with severity whereas many probably need support.                  Lastly, I noticed that vermin "Rats" are mentioned. Anyone living in Oxford knows that everyone is affected by their existence &amp; caution is needed regardless of whether the tenant feels their property should be 'rat free'.                  This issue in particular needs to be a combined effort of tenant &amp; landlord to lessen the risk of rats. Tenants do need to take responsibility in this issue &amp; education is imperative, not blame on Landlords only.</p>	<p>Thank you for your comments.                  We provide advice and assistance to landlords through regular newsletters and forums.                  We cannot enforce against tenants as we have no powers.</p>
<p>37</p>	<p>Unnecessarily long-winded and opaque in order to hide the Draconian nature of the policy</p>	<p>The policies are not meant to be “long-winded” or designed to hide. They have been written to comply with statutory guidance that requires the council to have these policies.</p>
<p>38</p>	<p>I agree that the council needs policies and the principles of these areas of regulation are required. However the implementation of these policies seems harsh. I saw no ability to protest the council's action and the use of independent review. I found the consultation process awkward.</p>	<p>The policies now include the appeal provisions, giving right of appeal to the First-tier Tribunal (independent review).</p>
<p>39</p>	<p>I would add that any entries onto the RLDB or any financial penalties that are issued should always carefully consider and provide due weight to the relevant circumstances and facts, especially before a decision is reached as</p>	<p>Thank you for the feedback. As made clear, penalties are carefully considered.                  As letting agents, if you feel the landlord is putting you at risk you</p>

	<p>to whether a landlord or agent is still deemed as a "fit and proper" person. From experience, there are occasions when a landlord may compromise an agent's position as manager/licence holder if he repeatedly refuses to undertake repairs or maintain his property to an appropriate standard due to his own negligence. This can occur regardless of the agency's efforts to push the landlord into carrying out the repairs. Therefore, should an agent still be awarded a financial penalty/ies, then each case must be assessed on its merits as to the business maintaining its 'fit and proper' person status. This is particularly the case where one bad landlord with two or more properties could incur financial penalties on each property, which could then result in an agency being shut down or have to cease trading until a suitable manager/licence holder are found.</p> <p>However, these policies should be in place to act as a strong deterrent to rogue landlords and agencies. The inclusion of reviewing and referring to the EICR certificates for C1 or C2 hazards when determining a prosecution/civil penalty also seems to be a sensible and positive step forward given the legal basis/requirement for these to ensure regulatory compliance.</p>	<p>have the option to cancel your agreement or alternatively to come forward and ask us to intervene if appropriate.</p>
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**Comments about enforcement approach in general**

	<b>Comment</b>	<b>Response</b>
7	Enforce the policies to ensure that people have decent houses and decent living conditions	<p>Thank you for the feedback.</p> <p>We enforce as per our corporate enforcement policy and aim to secure compliance by advice and assistance in the first instance and then take action on those who ignore our advice or deliberately avoid compliance.</p> <p>We do not mean for our communications to seem as though we are against landlords and are meant to offer advice and assistance.</p>
1 0	<p>Well overdue but its up to you to enforce them!</p> <p>Please don't go for the easy targets.</p> <p>The worst cases first please even if your success rate appears disappointing. May encourage more to comply.</p>	
1 4	I am concerned about the creeping bureaucratisation of private letting. It places burdens on landlords who already work hard, and the tone of your communications is so dire. We all support the exclusion of bad landlords but	

	surely they are a minority? It would be good if your round robins made this clear.	
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Comments judged not directly relevant to the consultation

	Comment	Response
3	Good landlords will sign up and rogue will continue to work below the line. All you are doing is pushing up the cost of owning a buy to let to landlords who have already had a raft of legislation introduced over the last few years. Beating in mind Oxford has lots of Victorian and older houses in Oxford that will now have to spend up to £ 33,000 to reach the upcoming EPC standards. The price to register seems reasonable but it has taken you so long to get this off the ground that you will problem want to increase the cost next year. Another nail in the coffin of the private landlord who at some point soon will start to sell up reducing your ability to house people on the city	This comment appears to be about licensing fees.
9	who are you who do you think you all are you dont own anything in oxford and you never will you dont have any rights to tell anyone what they can and cant do your all running on fraud and we will take you down one by one hmo are fraudulent council are fraudulent	This comment is judged as generally about the council.
30	Oxford City Council states that “Oxford Needs Homes” on its website. I am a live-in landlord and currently have two lodgers sharing with me. It seems wrong that there are so many students, interns and others seeking only a short-term arrangement of a month or two, who might have to sign a six-month AST elsewhere, yet if I were to take in a third lodger (without first becoming an an HMO) I would potentially face a £30,000 fine. I am single with no children; I like the company and prefer not to work any more, after years of stress when a director of a law firm in the past.	In general, very short term residents would not fall under the category of HMO.

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19	Too much red tape. If we want more rented properties then there should be less interference from Government, local authorities etc. Caveat emptor should come back	The Council has written the policies to comply with statutory guidance. You can direct your concerns to MP.
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Comments that appear to be duplicated

	Comment	Response
17	<p>I have submitted the following regarding this:</p> <ul style="list-style-type: none"> <li>* Lack of Explicit Anti-Discrimination Measures: The document does not explicitly mention measures to ensure that the Fit and Proper Persons Assessment is conducted in a manner that is free from racial, ethnic, or other forms of discrimination. This could disproportionately affect landlords from minority communities.</li> <li>* Ambiguity in "Fit and Proper" Criteria: The criteria for what constitutes a "fit and proper" person are somewhat vague and open to interpretation. This could lead to subjective judgments that may inadvertently target minority landlords.</li> <li>* Mitigating Circumstances: While the document mentions that mitigating circumstances will be considered, it does not specify what these might be. This lack of clarity could lead to inconsistent application of the law, potentially affecting minority landlords more harshly.</li> <li>* Associated Persons' Conduct: The inclusion of the conduct of persons associated with the applicant could be problematic. This could lead to guilt by association, which may disproportionately affect landlords from minority communities where communal living or extended family structures are more common.</li> <li>* Data Sharing with Other Bodies: The sharing of information with other statutory bodies raises concerns about data privacy and the potential for</li> </ul>	See comment #8

<p>profiling, which could disproportionately affect landlords from minority communities.</p> <ul style="list-style-type: none"><li>* Appeal Process: While an appeal process is mentioned, there is no information on how accessible this process is, especially for landlords who may face language or other barriers.</li><li>* Lack of Transparency: The document does not specify how the Council will ensure transparency in its decision-making process, which is crucial for building trust, especially among minority landlords who may already feel targeted.</li><li>* Case-by-Case Basis: While this allows for flexibility, it also opens the door for potential bias or discrimination, especially if the evaluators are not trained in cultural competence.</li><li>* Severity of Offenses: The document mentions that offenses involving fraud, violence, drugs, or sexual offenses are generally considered to make a person unfit. However, it does not consider the systemic issues that may lead to higher rates of certain types of offenses in minority communities.</li><li>* No Mention of Training or Oversight: There is no mention of any training for those conducting the assessments to ensure they are free from bias, nor is there mention of any oversight or auditing process to ensure fairness.</li></ul> <p>Overall, while the document outlines a structured approach to determining a landlord's fitness to hold a license, it lacks specific measures to ensure that this process is equitable and does not disproportionately target landlords from minority communities.</p>	
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