



Rt. Hon Andy Burnham MP
Prime Minister
10 Downing Street
London
SW1A

23rd July 2026

Dear Prime Minister,

A Preventative Housing System – Building on Your Vision for Housing Reform

On behalf of Fairer Housing, I would like to congratulate you on becoming Prime Minister and wish you every success in your new role.

Throughout your time as Mayor of Greater Manchester and during your election campaign, you have consistently spoken about the importance of tackling Britain's housing crisis. We were particularly encouraged by your statement that "everything starts with a good home" and by your commitment to building a more 'preventative state' — one that invests in preventing problems rather than continually paying to deal with their consequences.

We believe housing presents one of the greatest opportunities to turn that ambition into reality.

Fairer Housing works with private renters who are experiencing poor housing conditions, unlawful practices, homelessness and housing insecurity. Every week we see the consequences of a system that too often allows people to move into unsafe homes before anyone has established whether those homes are fit to live in.

Many organisations will understandably ask your government to provide local authorities with more resources to enforce housing standards. While additional resources will always be welcome, we believe this approach does not address the fundamental problem.

The current system is reactive.

A family moves into a property. Damp, mould, dangerous electrics or other hazards emerge. The tenant must recognise that the conditions are unlawful, understand their rights, find the confidence to complain—often fearing retaliation or eviction—and then wait while an overstretched local authority investigates. Only after harm has occurred does the system begin to respond.

No modern safety system operates in this way.

Cars cannot be driven until they have passed an MOT. Restaurants cannot open without demonstrating food hygiene compliance. Gas appliances, lifts and electrical installations all require certification before they are put into use.

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Yet in England, millions of privately rented homes can be occupied before there is any independent confirmation that they are safe, decent and properly managed.

We believe that should change.

For many years Fairer Housing, together with colleagues across the housing sector, has been developing what has become known as the 'Housing MOT' model. Rather than relying on complaints-led enforcement, our proposal requires landlords to demonstrate that a property complies with statutory safety and decency requirements *before* it is let.

This is not about creating another layer of bureaucracy.

Responsible landlords already obtain gas safety certificates, electrical inspections, Energy Performance Certificates and deposit protection. Our proposal simply brings these existing requirements together within a coherent, preventative regulatory framework that gives tenants confidence, supports responsible landlords and enables local authorities to focus their efforts on the relatively small number of landlords who deliberately operate outside the law.

The Property Database established under the Renters' Rights Act provides a once-in-a-generation opportunity to achieve exactly that.

Rather than functioning simply as a register, we believe it should become the foundation of a modern compliance system. Independently verified evidence of safety, decency and competent management could be uploaded before a tenancy begins, creating a simple and transparent process that protects tenants while significantly reducing the need for costly reactive enforcement.

Such an approach would directly support your ambition to build a preventative state.

It would improve public health by reducing housing-related illness. It would improve educational outcomes by ensuring children grow up in homes that are warm, safe and suitable for study. It would reduce pressure on local authorities and the NHS by preventing problems rather than responding to them after the damage has already been done.

Most importantly, it would shift responsibility to where it belongs—requiring landlords to demonstrate compliance before letting a property, rather than expecting vulnerable tenants to police housing standards after they have already suffered harm.

We believe Brent, the main focus of our support, would provide an ideal location for a national pilot. The borough has one of London's largest private rented sectors, significant housing pressures, an experienced local authority and a well-established voluntary sector. It offers an excellent opportunity to demonstrate how a preventative regulatory model could operate in practice before wider national implementation.

I have enclosed a copy of Fairer Housing's policy proposal, "A Proposed Model for the Renters' Rights Act Database," which sets out the Housing MOT model in detail. The proposal has been

developed over many years, has informed wider discussion within the sector, and has received support from members of The Lettings Industry Council.

Prime Minister, your government has rightly committed itself to tackling the housing crisis. We believe the next step is to move beyond a reactive system that waits for families to suffer before taking action, towards one that prevents poor housing from being let in the first place.

That is the principle behind the Housing MOT. It is practical. It builds upon legislation already passed by Parliament. It supports responsible landlords while protecting tenants. Most importantly, it delivers precisely the kind of preventative reform that your government has pledged to achieve.

Our founder, Jacky Peacock OBE, and I would welcome the opportunity to meet with you, your Housing Secretary and your officials to discuss this proposal further and explore how Fairer Housing could support its development. We would be delighted to contribute our practical experience and policy work to help deliver lasting improvements to England's private rented sector.

Thank you for taking the time to consider our proposals, and I wish you every success as you begin the important work of leading the country.

Yours sincerely,



Ross Feeney
Chief Executive
Fairer Housing CIC

CC: The Rt Hon Angela Rayner MP, Secretary of State for Housing, Communities and Local Government
Dawn Butler MP – Brent East
Barry Gariner MP – Brent West
Georgia Gould MP – Queen's Park & Maida Vale
Bob Blackman MP – Harrow East
Cllr. Muhammed Butt, Leader, London Borough of Brent

Appendix 1

PROPOSED MODEL FOR THE RENTERS' RIGHTS ACT 2025 DATABASE

Background

Our proposal has been developed from one that was formulated in the 1990s for a National Licensing Scheme. By the time property licensing was brought in, the model had been modified, making each local authority responsible for running their own schemes.



Over the years, this has resulted in a piecemeal approach, with diverse forms of licensing (HMO, Additional and Selective) being implemented with varying conditions, boundaries, fee levels, and inspections and compliance requirements. It is confusing for the public, and even the most conscientious landlords can be caught out, while unscrupulous landlords find ways to evade the system. Furthermore, it is not possible for licensing teams to enforce licence conditions; councils must rely on identifying HHSRS Hazards which come nearest to non-compliance with licensing conditions, and frequently sub-standard properties are licensed without enforcement action. Freedom of information requests made by *The Guardian* to English councils have revealed that two-thirds have not prosecuted a single landlord in the past three years, despite receiving 300,000 complaints from tenants living in “unfit homes”. This should not be surprising given that there is an average of only 2.2 Council enforcement officers per 10,000 PRS properties in the local area.

Increasingly, licensing has been used as a means of bringing in fees to cash-starved councils but has not had a major impact on increasing standards. Even in areas run by the best enforcement authorities, such as Oxford and Camden, sub-standard accommodation remains common. Enforcement is reactive, relying mainly on tenants having to endure poor conditions before complaining to their local Council which many are reluctant to do, even if they know this is an option available to them, which most do not. *Our model proposes using the Database to provide tenants with a decent and safe home from the start of their tenancy.*

Our Proposed Model

The model has been endorsed by Dr Julie Ruggi¹, and with only minor differences, is promoted by The Lettings Industry Council². It has become known as the MOT model because it is based on the DVLA system for road vehicles. This requires all owners of road vehicles to be registered on a central database, with annual renewals which confirm that the vehicle is road worthy and drivers are competent to drive. Evidence is appropriate to the type of vehicle (e.g. more stringent for HGVs than domestic cars) and is uploaded independently, thereby reducing opportunities for fraud.

¹ The model was recommended by Dr Julie Ruggi in her 2018 Report “The Evolving Private Rented Sector: Its Contribution and Potential”. She said: “There is currently no minimum standard that properties have to meet before they are let. Over a million renters are putting up with damp, disrepair and sometimes life-threatening hazards. A property MOT would give people confidence before they sign a tenancy that the property is fit for purpose, and that standards won’t lapse in the future, while for landlords, it offers greater clarity and protection against prosecution. This proposal is just one way in which existing legislation can be simplified to make the sector work better for everyone.”

² The Lettings Industry Council which represents those working in the industry who are striving to improve standards in the PRS.

To reverse the analogy, the current PRS system applied to vehicles would mean that anyone could legally drive a car in any condition without having any driving lessons, but the police would be empowered to stop any car seen driving on the wrong side of the road, and unable to stop at a red light due to defective brakes, and tell the driver that they had to get the brakes fixed and start to drive on the left hand side at some stage in the next three months or so.

It is noted that there are over 41.4 million vehicles registered with the DVLA compared with the 4.6 million private rented homes that will need to be registered on the Database. Monitoring is also easier because most homes do not move.

While the DVLA principle applied to private rented homes would require checks from multiple sources (gas, electrical safety, energy performance, deposit protection, etc) certification from all sources could and should be standardized for automatic uploading to the database. All should incorporate the Unique Property Reference Number (UPRN) which should also form part of the Database Registration ID Number issued to landlords.

Physical Standards

The only requirement which is not currently undertaken for all properties is an inspection to confirm that the property is safe and decent. Once the Decent Homes Standard is revised for application to private rented homes, a new DHS Certificate could be introduced, and landlords would be required to commission an 'MOT type' inspection prior to letting. DHS Inspectors³ would be trained to check the standard DHS requirements plus the additional elements for HMOs. Following inspections, landlords will be notified of any changes needed to meet the DHS before a DHS certificate can be issued. The certificate would then be issued and uploaded to the Database by the inspector.

Competent Management

Evidence of competent management could offer two options. The first would be for landlords to use a qualified agent to manage the property on their behalf. The Government has already accepted the qualification known as ROPA (Regulation of Property Agents)⁴ which should be mandatory at the appropriate level for all property agents.

Landlords who opt for self-management should be required to undertake Government accredited training with evidence of passing a test, and commitment to CPD, to be evidenced when registration is renewed.

Database Registration

Initial registration of landlord and property details would be required to obtain a provisional registration (equivalent to a provisional driving licence) before properties are marketed for

³ *Property inspectors* – it has been argued that it would be difficult to find enough qualified property inspectors to undertake all the inspections required. We would stress that inspectors do not need to be fully qualified Surveyors or EHOs. The introduction of the requirement for EPCs and the specific training for this soon spawned enough energy assessment officers, and there is already a one-year Advanced Professional Certificate in Private Sector Housing introduced to boost local authority enforcement teams. Interest has already been shown in the proposed property inspectors by Inventory Clerks and Fire Safety Inspectors.

⁴ Regulation of Property Agents Working Group:
https://assets.publishing.service.gov.uk/media/5d2f455240f0b64a855315d7/Regulation_of_Property_Agents_final_report.pdf

letting and the registration number must be quoted on all marketing material. Full registration would be required not later than the start date of the tenancy.

Compliance

Existing requirements would be renewed for the same periods as now, with property inspections every 3 to 5 years depending on age and property type.

Referring again to the DVLA system, as road users found guilty of offences may be fined and have their Licence endorsed, with either an accumulation of penalty points or a very serious offence resulting in having their licence revoked, a similar system could apply. For example, if a local authority had reason to serve a Civil Penalty Notice, or if a tenant made a successful application for a Rent Repayment Order, this would appear on the Database.

Minor breaches of the DHS, for example those identified from tenants' complaints, would attract penalty points while serious breaches, e.g. a fraudulent DHS certificate, would result in revocation of registration.

Similarly, an accumulation of management offences could lead to a prohibition on the landlord's right to manage the property, so the ability to continue letting would be conditional on using a ROPA qualified property agent. Serious management offences such as illegal eviction or misuse of the Sales ground for possession would result in revocation of registration.

No place to hide

Once the Database is fully operational and all landlords are required to be registered, landlords should be required to include their Database Registration ID on all legal documents to validate them. This would include the Tenancy Agreement (including the rent payable) Notices proposing a new rent, and all Notices requiring possession. This, along with public access to the Database at the relevant level, would make it easy for tenants and potential tenants to check whether a landlord is registered and fully compliant. We would also expect to see Database registration as a condition of re-mortgaging or borrowing against PRS properties.

A realistic enforcement role for local authorities

As the new system is phased in⁵, licensing could be phased out, leaving local authorities with a realistic and very effective role. They would be tasked with identifying unregistered (i.e. unlawfully let) properties; overcrowding; or fraudulent registrations and taking relevant action. This could range from entering penalty points on the Database, for example where an 'accidental landlord' had inherited an unregistered property and was in the process of ensuring compliance before registration; to prosecution or in extreme cases, issuing Interim/Final Management Orders, Banning Orders or CPOs.

⁵ It has been announced that the Phase 2 roll out of the Database at the end of 2026 will be regional with PRS landlords in each region specified being required to provide landlord and property-type/occupier information as well as basic safety information, e.g. gas, electric and energy performance. We suggest that this is an opportunity to ensure that gas inspection will require a Certificate that **gas appliances are safe** (the present legal requirement is for an annual inspection only). Phase 3, to include the Decent Homes Standard requirements for private landlords, could be introduced before landlords in the initial Database Regions are required to renew/update their Database registration, e.g. a year after initial registration, and include the requirement for a certificate that the property meets the Decent Homes Standard when registration is renewed.

A percentage of the Database registration fee should be transferred to local authorities to cover the cost of this work.

Cost effectiveness

While the regulatory model will require initial investment, it will show itself to be very cost effective, both for central and local government and for landlords and agents themselves.

The new enforcement role for local authorities will be easier and much cheaper than their current duties, and the Database registration fees will be significantly less than those for Licensing, even allowing for the cost of DHS certificates. Indirect savings would also accrue⁶.

The model will also provide a vital and reliable means for central and local government to communicate with landlords and agents. This will enable landlords to become aware of any changes in requirements and receive guidance on these. Most importantly, they would be made aware of the requirements for homes to be more energy efficient, as well as grants and other financial help that may be available for upgrades.

Jacky Peacock OBE

Founder, Fairer Housing CIC

November 2025

⁶ Public bodies, most notably the NHS would save costs, due to the reduction in property-related ill health. Important if harder to quantify savings would result from, for example, higher educational attainment for students living in homes conducive to study, and to unemployment benefits, as those living in decent homes are more likely to be fit for work. Tenants who are able to rely on having a decent and safe home will move less frequently, avoiding general, employment and schooling disruption as well as reducing the breakdown in relationships.