



**Cabinet Working Party
Houses in Multiple Occupation**

Housing Enforcement Service Transformation

November 2025

1. CONTRIBUTION TO OUR AIMS

- 1.1. The matters for consideration in this report contribute to the strategic objectives and priorities of the Council as detailed in Our plan for North East Lincolnshire: 2025 to 2028.
- 1.2. The plan sets out how our work will contribute to the overarching priorities of delivering a Stronger Economy and Stronger Communities. The Council is clear that everyone should have the right to a safe place to call home, and we understand the vital link between good homes and good health.

2. BACKGROUND

- 2.1. In July 2025, the Private Sector Housing Enforcement Team transferred into the Council and were brought together into a single team with the Environmental Enforcement Team.
- 2.2. In recent years, there has been significant discovery in preparation for the change with the aim of creating a cohesive, integrated enforcement team.
- 2.3. A new management structure was already in place which had increased resilience, professional and technical competency.
 - Head of Regulation & Sustainability
 - Environmental Health & Housing Manager
 - Senior Environmental Health Practitioner (EHP)
- 2.4. The Council also invested in a programme of professional staff development.
 - 3 Apprentice EHPs
 - 2 Graduate EHPs
- 2.5. A significant amount of work was carried out to improve the technical competency and accuracy of the work in Environmental Enforcement, with a similar exercise required for private sector housing enforcement.
- 2.6. Policies will need to be developed and familiarisation with technical guidance, through RIAMS and other professional support channels enabling officers to provide a consistent service delivery and regulatory approach that aligns with the Regulators Code.
- 2.7. Staff capacity was identified as a challenge, especially within housing. Data shared before the transfer indicated that there were 55 houses in multiple occupation (HMO's) known to the authority, requiring investigation and a significant number of open and ongoing general enforcement cases. There has also been a rise in Landlord appeals to the residential property tribunal which impacts on the resources available to respond to general workload. We identified that additional resources would be required to address capacity

challenges within housing enforcement, not only to support current workload demands and support the current workforce but to also address legislative changes on the horizon.

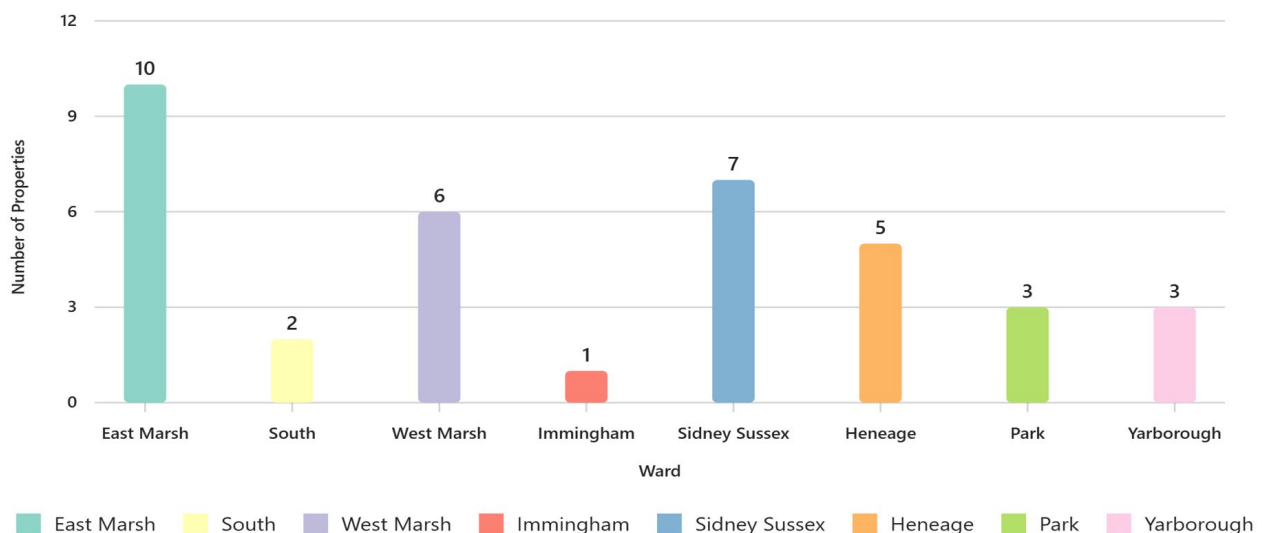
- 2.8. In addition, it was agreed that the Environmental Health and Housing team would take on non-technical highway enforcement for which no identified resources transferred. Estimates suggest this caseload is approximately 700 cases per year.
- 2.9. This transformation is also taking place alongside the need to implement the new Selective Licensing Scheme within parts of the East Marsh ward, which must be in place within 6 months of approval.
- 2.10. The transformation team continues to work closely with Environment to support this and other integration and transformation programmes, collating lists of outstanding procedures and reviewing the 'as is' position across the service.

3. HOUSING ENFORCEMENT

- 3.1. The housing enforcement team undertake a range of responsibilities which include monitoring and enforcing adherence to housing standards (owner occupied, private rented or social housing), HMO's, empty properties, overcrowding, caravan site licenses, empty properties, grants and loans and energy efficiency.
- 3.2. The current staffing provision is:
 - 1 x Housing Enforcement Manager
 - 1 x Senior Housing Enforcement Officer
 - 1 x Housing Enforcement Officer
 - 1 x Housing Enforcement Officer (Empty Properties)
 - 1 x Housing Renewal Officer (HMO)
 - 1 x Housing Renewal Officer (Grants and Loans)
 - 1 x Home Energy Efficiency Officer
 - 1 x Clerical Officer
- 3.3. The team has integrated into the Council on dedicated role profiles, focussed predominantly on the functional areas above. A wider service review is needed to understand whether this mode of operation is sustainable, given the increased service demands and additional responsibilities through future legislative changes.
- 3.4. **HMO's** - The legal definition of an HMO is contained within the Housing Act 2004. For simplicity, a property is an HMO if both of the following apply:
 - At least three people live there, forming more than one household
 - Toilet, bathroom or kitchen facilities are shared

A household consists of either a single person or members of the same family who live together. It includes people who are married or living together and people in same-sex relationships.

- 3.5. An HMO must have a licence if it is occupied by more than five people and meets the above criteria. The Council must keep a register of licensed HMO's which can be found at [NELC HMO Register](#).
- 3.6. HMO's generally offer a more affordable housing option for single people rather than renting a whole house or a flat.
- 3.7. **NELC Data** - HMO's are either discovered and established during inspection or referred to us through the Council's reporting portal. Data shared before the transfer indicated that there were 55 potential HMO's referred to the authority through the portal for investigation. There are now 39 open cases marked as in progress. The locations of these potential HMO's are as follows:



- 3.8. All 39 of these were referred through the online portal. A review of the summary that accompanied each of these service requests showed that the reasons for referral range from potential illegal HMO (i.e. meets the statutory definition for a licensable HMO and operating without a licence), some general disrepair complaints or simply a suspect HMO. All cases have been allocated to an officer and are progressing.

4. PRIORITIES FOR TRANSFORMATION

- 4.1. When preparing for the transformation, the following priorities were identified for the first year. This report provides an update on each of those priorities.
- 4.2. **SERVICE REVIEW** - A wider service transformation will be carried out over the forthcoming months to identify the overall needs of the service. The team is currently carrying vacancies in Environmental Enforcement, which we hope

can be used to create development opportunities across the wider team. By creating career development opportunities for the graduates and enrolled on an Environmental Health Degree we aim to secure their future retention. This is essential, as the Environmental Health and Housing profession is under resourced nationally and it is likely that there will continue to be significant competition for qualified and competent officers in this work area. Our plans will therefore support our aims of building professional knowledge and skill within the team and support with the retention of qualified officer capacity.

- 4.3. **RECRUITMENT** - In September we gained Leadership approval to create some additional positions to support with the identified capacity issues. This included the creation of:
- 4.4. **1 x Senior Environmental Health Practitioner** - This role was created in recognition of the increasing size of the housing enforcement team. Additional management capacity is required to ensure that our front-line staff are supported in their day to day work and that the team manager is able to focus on the ongoing team transformation. Due to the availability of technically competent housing officers in the jobs market we have adopted a 'Grow your own' model. This will also require additional competent manager support. Following an extended period of recruitment, we were unable to fill the vacancy. Approval was subsequently granted to appoint an external contractor to meet the current demands of the service. In addition, approval was granted to use a recently vacated position in the team to appoint an additional contractor to focus on housing. We are currently interviewing agency staff to fill these positions. The contract is for a 12 month term.
- 4.5. **3 x Environmental Health & Housing Graduates (1x 2 year fixed term position funded by Public Health)** - Appointed two graduates through the recruitment and selection process. Currently reviewing options for the third. The start date is the 1st December 2025.
- 4.6. **3 x Regulatory Compliance Officers (1 for Highway Enforcement)** - Successfully recruited to these positions with a start date of the 1st December 2025. Received additional approval to appoint a further two officers from the recruitment exercise using existing vacancies. This is five Regulatory Compliance Officers (RCOs) in total.
- 4.7. The graduates will be enrolled on the Diploma in Housing Interventions and the Regulatory Compliance Officers on a Regulatory Compliance Apprenticeship.
- 4.8. **SERVICE DESIGN / WORKFLOW MAPPING** - The transformation team has been working closely with the team to redesign the service. This includes a complete review of the end-to-end process, existing policies and procedures, letter and notice template documents and the time that officers are spending on each aspect of the job. This workstream is also linked into the work that the Project Team are doing with Arcus (service case management system). The anticipated completion date for this work is December 2025.

- 4.9. **IDENTIFYING TRAINING NEEDS** - Our workforce holds a varied range of experience and qualifications. Within the Environmental Health and Housing profession there are various recognised qualifications that can increase the knowledge, skill and competency of staff across the service area. In addition to the training and qualifications offered to new officers joining the team, a range of development opportunities have been offered to the existing team.
- 4.10. Since July, officers across the service have enrolled on the following:
- The service manager is undertaking a L7 Leadership Course (Sept 2025)
 - Two housing officers are undertaking the Private Sector Housing Regulatory Compliance Apprenticeship (start date Sept 2025)
 - One Environmental Enforcement Officer has enrolled on the Regulatory Compliance Apprenticeship (start date October 2025)
- 4.11. We are also working closely with colleagues in Learning and Development to develop a career mapping report, which provides a clear and transparent framework for development across the service. The report includes qualification routes, skills, knowledge and behaviours required for each role and training requirements. This framework can also be used to assist with future recruitment.
- 4.12. In addition to this, the Service Manager has delivered in house training on Housing Health and Safety Rating System (HHSRS) and consistency with housing inspections. Shadowed officer visits will follow.
- 4.13. Officers are now using the wealth of information available through RIAMS to ensure that formal enforcement action is taken in an accurate and consistent manner.
- 4.14. **POLICIES AND PROCEDURES** - Policies and procedures are being reviewed as part of the service redesign process and will be benchmarked against other local authorities.
- 4.15. **OFFICER AUTHORISATIONS** - The review of officer authorisations is now complete, and all officers have moved onto NELC's Scheme of Delegations. We will need to continually revisit this process as we introduce new roles and responsibilities into the team. We can use the experience of other service areas across Environment that have similar roles and structures to identify opportunities to align officer competency within the teams.

5 WIDER CONSIDERATIONS

- 5.1. **SELECTIVE LICENSING** - Selective licensing received approval to progress on the 8th October 2025. A project team is established to lead on this area of work. The subgroups include:

- Legal and Governance
- Finance
- Operational delivery
- Communications
- System and ICT
- Service design

5.2. Fortnightly sprint meetings take place with each of the project groups to ensure we are in a position to fully implement the scheme within the six-month statutory timeframe.

5.3. A change management business case has been submitted and approved by Leadership for the additional staffing resource required to deliver the scheme. This includes:

- 1 x Team Leader
- 3 x Housing Officers
- 2 x Regulatory Compliance Officers

Role profiles have been finalised which will now be submitted to Job Evaluation Panel. We are also exploring alternative delivery models to ensure that there is resilience should suitable candidates not be forthcoming.

5.4. **RENTERS RIGHTS ACT 2005** - The [Renters' Rights Act 2025](#), recently passed into law in England. It includes several key changes such as abolishing Section 21 'no-fault' evictions, ending discriminatory practices against tenants with children or those receiving benefits, and banning rent bidding. It also converts all existing fixed-term tenancies to periodic ones, limits rent in advance to one month and brings [Awaab's Law](#) and the [Decent Homes Standard](#) to the private rented sector. The legislation will place additional statutory duties on local authorities and strengthen our role and powers in enforcing regulations in the private rented sector.

5.5. We are attending regional and sub regional meetings on Renters Rights Act to prepare, alongside other local authorities for implementation. Justice for Tenants are part of these discussions, supporting with harmonised systems, procedures, processes and documentation. Whilst we are not fully aware of the full impacts in terms of resource, our efforts to increase resource through our current recruitment drive can support with the preparatory work for this.

6 CHALLENGES

6.1. Whilst we are pleased with the progress currently being made, the transformation programme is not without challenge. Key challenges include:

6.2. **Recruiting suitably qualified and competent staff** – Recent recruitment efforts demonstrate the challenge with attracting suitably qualified officers to the roles. Whilst we can demonstrate success with the 'grow your own model',

the length of the course and the training needs place a greater pressure on the existing workforce, especially the Service Manager.

- 6.3. **Capacity** - Executing these plans is resource intensive, placing a greater strain on managerial and officer capacity, including wider local authority support.
- 6.4. **Scale and pace of change** – the current pace of change is outstripping officer capacity.
- 6.5. **Accommodation** – there are limited accommodation options to support the growing size of the team. Whilst the team have the ability and equipment to work from home, when training a growing team, an office base is the preferred option. Conversations continue with Estates.
- 6.6. **Additional legislative requirements** – The implementation of the Renters Rights Act will place additional responsibilities on the team, that may also require policy and procedural changes, a redesign of our systems, additional training and support both internally and with our stakeholders and a greater level of cross departmental work.
- 6.7. **Managing Demand** – The current demands on the team are having a detrimental impact on the health and wellbeing of the workforce. Whilst additional recruitment supports with some of these challenges in the longer term, there will be an increased reliance on existing officer resource to support with training, shadowing and engagement.
- 6.8. **Current levels of absence** – we have experienced an increased level of officer absence over the recent months. We continue to monitor this, with support from colleagues in People and Culture.

7 NEXT STEPS

- 7.1. Finalise the role profiles for selective licensing recruitment and the induction process.
- 7.2. Continue discussions with training providers to enrol the new officers onto relevant courses.
- 7.3. Progress selective licensing implementation including accommodation options.
- 7.4. Continue the service redesign work.
- 7.5. Continued attendance and engagement at regional meetings in relation to Renters Rights Act 2005

8 CONTACT OFFICERS

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