

Appendix 1: Civil Penalties for Housing Offences Policy Matrix

Factors	Score = 1	Score = 5	Score = 10	Score = 15	Score = 20
1. Deterrence and Prevention	High confidence - that financial penalty will deter repeat offending. Informal publicity not required as a deterrence	Medium confidence that a financial penalty will deter repeat offending. Minor informal publicity required for mild deterrence in the landlord community	Low confidence that a low financial penalty will deter repeat offending (e.g., no contact from offender) Some informal publicity will be required to prevent similar offending in the landlord community	Little confidence that a low financial penalty will deter repeat offending. Likely informal publicity will be required to prevent similar offending in the landlord community	Very little confidence that a low financial penalty will deter repeat offending. Informal publicity will be required to prevent similar offending in the landlord community
2. Removal of Financial Incentive	No significant assets. No or very low financial profit made by offender	Little asset value. Little profit made by offender	Small portfolio landlord (between 2-3 properties). Low asset value. Low profit made by offender	Medium portfolio landlord (between 4-5 properties) or a small Managing Agent. Medium asset value.	Large portfolio landlord (over 5 properties) or a medium to large Managing Agent. Large asset value. Large profit made by offender.
3. Offence and History	No previous enforcement history. Single low-level offence.	Minor previous enforcement Single offence	Recent second time offender. Offence has moderate severity or small but frequent impact(s)	Multiple offender. Ongoing offences of moderate to large severity or a single instance of a very severe offence	Serial offender. Multiple offences over recent times. Continuing serious offence
4. Harm to Tenant(s) (Score is doubled on this section in line with Statutory guidance)	Very little or no harm caused. No vulnerable occupants. Tenant provides no information on impact	Likely some low-level harm / health risk(s) to occupant. No vulnerable occupants. Tenant provides poor quality information on impact	Likely moderate level health / harm risk(s) to occupants potentially exposed. Tenant provides some information on impact but with no primary or secondary evidence.	High level of health / harm risk(s) to occupant. Tenant(s) will be affected frequently or by occasional high impact occurrences. Vulnerable occupants more than likely exposed. Small house of multiple occupancy (HMO) (3-4 occupants), multiple occupants exposed. Tenant provides good information on impact with primary evidence (e.g., prescription drugs present, clear signs of poor health witnessed) but no secondary evidence	Obvious high-level health / harm risk(s) and evidence that tenant(s) are badly and / or continually affected. Multiple vulnerable occupants exposed. Large HMO (5+ occupants), multiple occupants exposed. Tenant provides excellent information on impact with primary and secondary evidence provided (e.g., medical, social services reports).