

Appendix 1: Civil Penalties for Housing Offences Policy Matrix

Factors	Score = 1	Score = 5	Score = 10	Score = 15	Score = 20
<b>1. Deterrence and Prevention</b>	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
<b>2. Removal of Financial Incentive</b>	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.
<b>3. Offence and History</b>	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
<b>4. Harm to Tenant(s) (Score is doubled on this section in line with Statutory guidance)</b>	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).