

Landlord-perpetrated abuse of tenants in the English private rented sector

Lisa O'Malley, Loren Parton and Julie Rugg

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A report from the ESRC study: Understanding criminality in the private rented sector and co-producing solutions

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Executive summary

Introduction

- Tenant voices tend to be lost in the discussion of strategies for tackling landlord-perpetrated crime. However, listening to tenants indicates that malign landlord behaviour extends beyond the legislation that is routinely applied to non-compliance in the private rented sector (PRS). This report recognises the incidence of landlord-perpetrated tenant abuse: highly manipulative practices that enable the landlord to engage in long-term exploitation of highly vulnerable tenants. This kind of behaviour is routinised in the 'shadow' PRS and is experienced by tenants who are unable to secure access to mainstream rental property.

Policy responses to tenant problems in the PRS

- Landlord-perpetrated criminality has been recognised as a problem in the PRS. Many reports have highlighted the lived experience of renters, and the Renters' Rights Act was passed to deal with issues relating to property disrepair and tenancy security. These interventions, though welcome, focus on what might be regarded as the middle of the market. Many tenants are excluded from this part of the market because their work is low paid and/or sporadic so they cannot offer bank accounts showing regular income; they may be reliant on Universal Credit; they may not be able to present a home-owning guarantor; their personal characteristics might mean that they are not regarded as 'ideal tenants'; English may not be a first language, and knowledge of housing rights might be poor; and recent migration to the UK might mean that their immigration status could be regarded as problematic.
- Landlords target tenants who have limited housing options, because such tenants are easier to exploit. They also target tenants who may be easy to manipulate including older people and others who are vulnerable. Landlords offer these individuals the very poorest quality accommodation and use the threat of eviction to ensure compliance. Landlords often evict these tenants illegally when the arrangement no longer suits their purpose.

Tenant abuse and crime in the PRS

- This report is one of a series of reports on landlord criminality in the PRS. The research project recognises several modes of criminality. **First**, the PRS is regarded as 'criminogenic space': that is the complex system that makes up the operation of this part of the market contains multiple features that are conducive to crime including: the unbalanced nature of the landlord/tenant relationship; landlords are able to choose tenants it is easiest to exploit; the landlord sets the terms of the tenancy; abusive behaviours are hidden in domestic settings; and tenants are often too ashamed of their living circumstances to invite local authority access.
- 1. **Second**, there are a number of different types of criminal landlord, each relies to some degree on tenant abuse. For example, slum landlords will be 'milking' property – amassing an extremely poor-quality portfolio with no intention of investing in repairs or maintenance. They will seek tenants who have no other housing options. Landlordism linked to organised crime groups might extend abusive behaviours into modern slavery or inducements to criminal activity.
- This report is based on qualitative research with local authorities in the Yorkshire and the Humber region, including interviews with 50 environmental health professionals and

housing officers, and 37 interviews with police officers working in various roles in the four police forces in the region. See Appendix 1 for a full research method.

Abusive landlord behaviours

The nature of abuse: power and control

- The range and nature of landlord-perpetrated abuse rests on power imbalances between landlord and tenant. A modified 'power and control wheel' is a useful tool to explain abuse relationships. The 'spokes' of the wheel describe the behaviours that instil fear in the tenant that enables financial exploitation, which can extend to elements of fraud and inducing tenants to commit crime.
- It could be argued that 'tenant abuse' is no different to commonplace tenant experiences in the PRS in terms of landlords being slow to effect repairs or charging high rents. However, this report demonstrates that abusive behaviour generally includes multiple types of manipulative control and exploitation which often lead to the tenant becoming afraid of the landlord and uncertain about the boundaries they are willing to cross.

Relying on the threat of homelessness

- Abuse was predicated on the landlords' ability to evict the tenant at will. This did not mean that the tenant would be served a legal notice to quit. Eviction would take place in two ways. A coerced eviction would mean that a landlord's abusive behaviour was stepped up so that a tenant's found it impossible to stay in a property, either because of physical threat or because the property was allowed to deteriorate so far as to become unliveable. A 'lock-change' eviction meant that a tenant was immediately deprived of their home *and* all their belongings, so threatening immediate destitution. Tenants living in HMOs were often witness to other tenants being illegally evicted in this way.

Types of abuse

- Types of abuse included: trespass and/or invasion of privacy; physical intimidation; unwanted sexual attention; theft, retention or abuse of tenant possessions; financial exploitation including spurious additional charges or modern slavery; inducement to commit criminal acts; emotional manipulation; violating tenant rights; and removing essential services. This meant that the landlord would cut off supplies of hot water, electricity, gas or even internet connections with no notice, often for long periods. Tenants reported abusive rental relationships that lasted for years.
- These actions were intended to maximise financial benefit to the landlord, but also to create circumstances in which the tenant would be unlikely to seek statutory assistance either through fear of the landlord, because the landlord had successfully misinformed the tenant as to their rights or because the landlord had manipulated the tenant so that they felt a degree of 'loyalty' to the landlord.
- An abusive relationship no longer serving the landlords purpose meant that the tenant was finding it difficult to pay the rent, had complained to the authorities, or the landlord had devised a more profitable way to use the property. This often led to an illegal eviction.

Impact of abuse on tenants

- Tenants reported multiple emotional and mental health impacts. Abuse taking place in a domestic setting constituted a violation of home and self: tenants no longer felt safe. Abuse led to diminished self-esteem, with the tenant blaming themselves for submitting to the abuse, or for failing to recognise that the tenancy would be problematic. Tenants were living in a state of 'hyper-precarity': home was not a place of comfort and security; utilities

could be cut off at any time; trespass could take place at any hour; and eviction was a constant threat. Tenants were powerless to change the landlord's behaviour and often lived in fear of physical altercations. Where households contained children, parents were unable to protect their children from the impacts of abuse, including being unable to explain – for example – why there was no heating or hot water.

- Physical and mental health consequences were inevitable. Poor property conditions exacerbated medical conditions: many of the tenants reported hospital visits. There were reports of serious mental health impacts. Two tenants were referred to safeguarding officers because of the severity of their symptoms, which included suicide ideation, self-harm and suicide attempts. Tenants reported anxiety and depression, and impacts on children also including anxiety, and bedwetting.

Statutory and legal responses

Statutory agencies' awareness of abuse

- Statutory agencies did not use the term 'tenant abuse' but were aware of the range of behaviours outlined in the previous chapter. Housing legislation tends to concentrate attention on property conditions rather than interactions between landlord and tenant; a tenant's experiences within a non-compliant property were rarely an immediate concern.
- The experience of tenants came more strongly into focus in respect to illegal eviction. Enforcement teams were aware of the incidence of illegal eviction but not of the longer-term abuse that very likely predated the harassment action that the landlord intended to oust the tenant from their home.
- Housing Options officers commented on possible financial exploitation arising as a consequence of regulations allowing direct payments to landlords of the housing support element of Universal Credit (Alternative Payment Arrangements). This can often be supportive measure where tenants find it difficult to arrange their own finances. Some landlords insist on alternative payment arrangements, and no monitoring of these payments takes place.
- Housing Options teams noted that there were marginalised groups that were more vulnerable to abuse, including migrant communities and households or individuals with No Recourse to Public Funds.
- Policing interviewees were more likely to be aware of tenant abuse associated with crimes such as cannabis farming or modern slavery. In these circumstances, perpetrators were not immediately recognised as being 'landlords', although their letting property facilitated these types of crime. None of the policing respondents mentioned tenants as victims of crime more generally: this area was regarded as falling under civil rather than criminal legislation.

Reporting abuse and the statutory response

- Local authorities often commented that the scale of landlord abuse is hidden. All the tenants who were interviewed had approached the local authority or police to report their experiences before their situation reached a crisis point. Many were dismayed and disappointed by a lack of support.
- The report identified a reinforcing negative spiral:
 - People in abuse tenancies are unlikely to approach local authorities;
 - Problems that are reported to local authorities are often dismissed, or the tenant is blamed for the situation they find themselves in;

- Where local authorities respond, the priority is often to maintain an abusive tenancy; if the tenant is moved, one abusive letting might be replaced with another;
- Abusive landlord behaviours become normalised or even expected;
- People in abusive tenancies are unlikely to approach local authorities.

Problems being dismissed, or the tenant being blamed

- Tenants who complained to the local authority said that their problems were often dismissed. One tenant who had been subject to sexual harassment by her landlord was told that her property was in relatively good condition, so she had nothing to complain about.
- Local authority homelessness teams often judged a complaint in terms of whether it the tenant was at risk of homelessness. Where a tenant had been given a verbal notice to quit, an invalid written notice, or was being harassed, the Housing Options team informed the tenant that they were not at risk of eviction and so were ineligible for assistance. These tenants were then often subject to a coerced or lock-change eviction.
- Tenants were in some measure blamed for their housing circumstances. They lived 'chaotic lives' and fell into rent arrears, which was taken as a justifiable reason for the illegal eviction. Local authorities lost interest in supporting tenants who might not present well in court.

Local authorities maintaining an abusive tenancy, or replacing one abusive landlord with another

- Local authority homelessness teams and private sector housing teams prioritised mediation as a first step when faced with a tenant complaint. Here, the guiding principle is to ensure that the tenancy does not end in a way that burdens the local authority with a homelessness relief duty. The presumption is that the local authority is stepping in to deal with the tenant's problem, to the landlord's satisfaction.
- Enforcement interventions also often mean that the tenant remained within the property as improvement notices were served, and landlords' problematic behaviours continued.
- Some local authorities indicated that their heavy reliance on the PRS to meet homelessness need meant that they sometimes used landlord who they knew had problematic practices, and where property conditions were poor.

Abusive landlord behaviour becomes normalised

- Many tenants were simply moving – in the words of one housing officer – '*from one crappy landlord to another*', without ever coming to the notice of the authorities. Safer Renting data indicates that tenants often experienced serial abusive rental arrangements, punctuated by illegal evictions. It was not unusual for tenants to regard their experiences in terms of bad luck, and a lack of statutory interest confirmed for tenants that abusive behaviour was an expected characteristic of renting at the very bottom of the market.
- Normalisation then fed into officers' views that these conditions were in some way inevitable: tenants '*just accept that this is how they must live*'.

Recommendations

Recognising tenant abuse as criminality

- The very lowest end of the PRS – the shadow PRS – operates to the extreme detriment of many tenants. Landlords in this part of the market 'milk' properties, making a conscious decision to extract maximum profit by binding a tenant to a poor-quality property through emotional manipulation, misinformation and threat.

- There appeared to be a high degree of tolerance of this behaviour amongst enforcement and homelessness officers. Identifying landlord-perpetrated tenant abuse as a crime would constitute a first, major step in devising effective interventions.

Recognising abuse, and recognising abuse as trauma

- Local authorities are encouraged to exercise 'professional curiosity' in their dealings with possible victims of landlord abuse. Housing options teams commented on tenant unwillingness to be housed in the PRS as a means of alleviating their homelessness. Unpick a tenant's past experience in the sector can help to explain this reluctance.
- In some cases, experience of abuse will amount to trauma, which means that trauma-informed approaches are appropriate. These encourage client engagement that asks, 'what has happened to you?' rather than 'what is wrong with you?' and considering ways in which tenants might feel less vulnerable to abuse in any PRS placement.

Identify effective protection and enforcement tools

- Elements of good practice that were recognised within the case study area included multi-agency working around the PRS. Risk Assessment Conferences included private sector housing officers and adult safeguarding representatives, forging a closer working relationship where an enforcement team was more likely to refer a vulnerable individual to the safeguarding team.
- One local authority had a dedicated PRS tenant support officer, who worked closely with local landlords and tenants on their patch, and whose physical presence in the area meant that they were able to spot problematic properties and knock on doors. The officer regularly made referrals to the enforcement team but also engaged in ongoing support of the tenant until their housing issues were resolved.

Legislative interventions

- Local authorities lack appropriate protection and enforcement tools when faced with abusive landlord behaviour. This report suggests that a review should take place of the Serious Crime Act 2015 to consider its application to the landlord/tenant relationship. The Act legislates against 'controlling or coercive behaviour in an intimate or family relationship', and many of the behaviours identified in the Act's guidance echo the tenant experiences discussed in this report.
- The report also suggests that greater use could be made of anti-social behaviour injunctions, under the Anti-Social Behaviour Crime and Policing Act 2014. Local authorities are empowered to seek injunctions under the Act against individuals whose activities are causing or likely to cause harassment, alarm or distress; causing nuisance to a person in relation to occupation of a residential property; or capable of causing housing-related nuisance. One local authority – Wolverhampton City Council – has used this legislation to control poor landlord practices.

1. Introduction

1.1 Introduction

Tenant voices tend to be lost in discussion of strategies for tackling landlord-perpetrated crime. Listening to tenants indicates that malign landlord behaviour can extend beyond the reach of legislation that is routinely applied to non-compliance in the private rented sector (PRS). This report recognises a set of behaviours that can usefully be termed 'tenant abuse'. Some of these behaviours are identical to measures that might be undertaken by a landlord to force a tenant to leave the property. Tenant abuse differs from harassment in terms of intent. Tenant abuse comprises manipulative practices that enable the landlord to engage in long-term exploitation of – often – highly vulnerable tenants. This behaviour can take place in a variety of rental situations but is routinised at the lowest end of the market in the 'shadow PRS'. This introduction offers background information on modes of landlord criminality, and where tenant abuse – as a distinct set of behaviours – sits within those frames. This is one of four reports presenting findings from a large-scale ESRC project examining the incidence of landlord-perpetrated crime in the PRS. The project explored aspects of local authority enforcement and policing and examined the experiences of households who were victims of this type of crime.

1.2 Policy responses to tenant problems in the PRS

Landlord-perpetrated criminality has been recognised as a problem requiring statutory intervention. Rhetoric has shifted from reference to 'rogue' landlords who may have poor practices, to recognising that intentionally criminal landlords who operate in the market and require a more strategic response. In 2020, *Journeys in the Shadow Private Rented Sector* characterised different types of landlords who were letting property with no intention to comply with the legislation.¹ In 2022, the then Department of Housing, Levelling Up and Communities launched a £14m programme to fund pathfinder projects across 29 local authorities, aiming to 'build enforcement capacity and capability, and test and disseminate innovative approaches'. Two of the projects were focused on disrupting organised crime within the PRS (Leeds City Council) and improving intelligence sharing with the intention of 'ousting rogue and criminal landlords and agents' (Liverpool City Council).²

These policy interventions indicate an awareness that tenants can be victim to landlord criminality but have not explicitly addressed tenant experience. Multiple research reports have highlighted the lived experience of renters, which has disclosed dissatisfaction with endemic problems in the sector including lower property standards relative to other tenures; tenure insecurity; and affordability issues. The Renters' Rights Act, which was passed as this report was in preparation, attempts to tackle the first of these two issues by: reforming tenancy law; improving access to redress; reinforcing local authority responsibilities to enforce existing housing regulations; increasing sanctions for non-compliance, through higher civil penalty notices; and introducing a landlord database. These interventions, though welcome, tend to focus on what might be regarded as the middle of the market, where changes to the frameworks of tenancy legislation, redress and

¹ R. Spencer, B. Reeve-Lewis, J. Rugg and E. Barata (2020) *Journeys in the shadow private rented sector*, Cambridge House/University of York.

² UK Parliament (2023) 'Reforming the Private Rented Sector: Government's response to the Committee's Fifth Report of Session 2022-23', <https://publications.parliament.uk/pa/cm5803/cmselect/cmcomloc/1935/report.html>, accessed 29 Sep 2025.

an understanding of tenant rights would improve the operation of a market regarded as unbalanced in the landlord's favour. The Act presumes that problems in the PRS will be rectified by improving the ability of tenants to act as consumers and exercise their rights.

The voices of tenants at the very lowest end of the market have been absent from these discussions. These tenants' social and economic characteristics mean that they are unable to access the mainstream PRS. For example:

- they may be reliant on low-paid, sporadic work and not be able to present bank accounts showing regular income;
- they may be reliant on Universal Credit to help pay the bills;
- they may not be able to present a home-owning individual willing to act as a guarantor;
- poor mental health might mean addiction problems which preclude them presenting as a 'good tenant';
- recent migration to the UK could mean that their immigration status is regarded as problematic; and
- English might not be their main language, and unfamiliarity with the UK housing system means that it is difficult for them to negotiate a good tenancy.

Often, landlords in the shadow private rented sector will target tenants whose exclusion means that they are easier to exploit. Landlords will also pinpoint individuals who are easy to manipulate including people with developmental difficulties and older people who might be easily confused and bullied. The experience of these tenants might be described in terms of 'hyper-precarity', since eviction is a constant threat. Indeed, eviction is generally triggered when the landlord decides that this letting arrangement no longer serves their purposes. Abusive landlords generally rely on coercive or lock-change evictions and act with impunity knowing that even if they are reported to the authorities, tenants' complaints will rarely provoke investigation or prosecution.

1.3 Tenant abuse and crime in the PRS

This report is one of several reports published from the ESRC project 'Understanding criminality in the private rented sector and co-producing solutions'. This project found that there are multiple modes of criminality in the private rented sector.³ Tenant abuse sits within these different modes.

First, the project recognises that the PRS constitutes 'criminogenic space'. This means that the complex system which makes up the operation of this part of the housing market includes many features that are conducive to criminal behaviour. The landlord/tenant relationship is one arena that can foster criminal responses by both tenants and landlords. This report will be focusing on landlord criminality, which is only possible within the very particular circumstances of a letting arrangement. These circumstances are defined below.

Unbalanced nature of relationship

In the current UK housing market, the tenant is disadvantaged in respect to limited property supply in relation to demand. The unbalanced nature of demand and supply increases tenant tolerance of poor property conditions and management practices.

³ J. Carr, K. Colliver, C. Hunter, I. Langdale, B. Reeve-Lewis, J. Rugg, D. Scully & R. Spencer (2025) *Are the English civil and criminal remedies for harassment and illegal eviction fit for purpose?* University of York; K. Colliver & C. Hunter (2025) *Enforcement against slum landlords in England*, University of York; X. L'Hoiry, G. Page, L. Parton, J. Rugg & G. Antonopoulos (2025) *Criminal landlords and the shadow private rented sector in England*, University of York.

Relationship is chosen by the landlord

Faced with several possible tenants, the landlord can choose the tenant it is easiest to exploit.

The landlord sets the terms

The landlord sets the terms and conditions of the tenancy, including the type of tenancy arrangement they will allow. This creates opportunities to abuse tenant rights.

Abusive actions are hidden

Abusive behaviours take place within domestic space, and within the interpersonal exchanges between landlord and tenant. This means that abuse can be very difficult to 'see', and difficult for the tenant to prove.

Tenant shame

Tenant shame at living within overcrowded, poorly maintained property means that they may be unwilling to allow statutory authority access, which further prevents the detection of abusive behaviours.

Second, there are at least four different types of criminal landlords, and each relies to some degree on an element of tenant abuse. Tenant abuse is integral to slum landlordism. 'Milking' property by maximising rental income and minimising investment in property repair and maintenance relies on there being tenants who have no option but to tolerate such conditions. Manipulative and threatening behaviour and the threat of eviction reduces tenant willingness to report conditions to the authorities. Slum landlords will favour submissive and vulnerable tenants who try and make a home in a poor-quality property and continue to pay the rent. Illegal eviction is a constant threat, but interview material indicates that this kind of abusive relationship can last for many years.

Sham landlords will be more likely to set up tenancies where there is some uncertainty around the legality of the letting arrangement. Criminal letting agents will often support the operation of slum and sham landlords but also add a layer of exploitation, perhaps through imposing additional fees. Landlords linked to organised crime introduces the possibility that tenants may be subject to crimes including modern slavery or be made to support activities such as cannabis farming.

1.4 Research method

The project comprised a multi-method programme of research, described in detail in Appendix 1. This particular report draws most heavily on work undertaken with Safer Renting. This London housing charity provides advice and support directly to tenants who have been victimised by criminal landlords and is also contracted to supply tenancy relations services to several London boroughs.⁴ Boroughs refer cases to Safer Renting where the tenant has been subject to the threat of illegal eviction or has been illegally evicted. The charity works with the clients to resolve their legal issues and forward prosecution of the landlord or letting agent where appropriate. The report uses three types of data.

Safer Renting cases

The ESRC team collected anonymised narratives from Safer Renting advice workers, detailing 33 cases. Almost all these cases had all presented to Safer Renting within the last two years. The

⁴ <https://ch1889.org/safer-renting/>, accessed 4 Nov 2015.

narratives covered tenant experiences up to and including their experience of the threat of illegal eviction, and the eviction. It was not always possible to include information on outcomes for the tenant, since tenants often disengaged from contact with Safer Renting for reasons that are not possible to identify. These interviews were collated as individual cases, and each was given a set of initials that did not match the tenant's name. They are referred to as 'Safer Renting case XX'. All Safer Renting clients are routinely asked in advance if their anonymised data can be used for research purposes. Information was collected via recordings with Safer Renting officers, and information was analysed using a thematic grid.

Safer Renting interviews

The Safer Renting team also completed fifteen interviews with clients who had agreed that they could be recontacted. The interviews each lasted around an hour and asked the tenant to describe their experience that led to an attempted or actual illegal eviction. These interviews were all formally transcribed, which meant that it was possible to include tenant voices in this report. These data were also analysed using a thematic grid. Again, each interview was ascribed a set of initials that did not match their name and are referred to as 'Safer Renting interview XX'.

Statutory authority data

Data was also collected from local authority respondents in Yorkshire and the Humber, which was the principal ESRC project case study location. This report draws heavily on recorded interviews with officers within private sector housing teams (PSHs), housing options teams (HOPs) and one interview with an officer with responsibility for landlord/tenant liaison (LLT).⁵ The interviews were transcribed and subject to thematic analysis. Where the report draws on direct quotation, an anonymised code number indicates the respondent type, local authority code and respondent number.

The project also undertook detailed exploration of a selected number of prosecution cases from four local authorities within the case study area. These cases included close reading of documentation produced as the case progressed, leading to the production of detailed case notes. An interview also took place with the leading officer who was taking the case. The report draws on two of the prosecution cases that included elements of tenant abuse.

Policing interviews

Policing interviews took place across the four forces working in the Yorkshire and the Humber region, and included 37 staff, working in various capacities. Full details of the programme of research are given in Appendix 1. Policing interviews are given the code 'POL', with a unique identifier number.

1.5 Report structure

The report is structured in four sections. Chapter 2 discusses the nature of tenant abuse, introducing the concept of a 'power and control' wheel as a valuable method of understanding tenant experience. The chapter also describes the impact on tenants of their experience of abusive landlords. Chapter 3 shifts focus to consider statutory responses to tenant abuse. The concluding chapter offers some reflections on the need for change in response to this behaviour and offers some recommendations on alternative approaches.

⁵ The exact job title has been redacted for reasons of confidentiality.

1.6 Conclusion

Tenant abuse is a set of behaviours that is characteristic of criminal landlords operating in the shadow private rented sector. Abuse is predicated on criminal landlords' ability to exploit households who are excluded from the mainstream rentals because of their demographic and economic characteristics. Tenant experience of abuse is largely hidden, overlooked by debate identifying problematic private landlords and by interventions that aim to secure landlord compliance with housing and tenancy law. The remainder of this report will describe in detail tenant experience of abuse, and the nature of the statutory response. The report offers recommendations that aim to shift the tenor of that response and prompt a review of protective legislation that might be extended to cover the landlord/tenant relationship.

2. Abusive landlord behaviours

2.1 Introduction

This section discusses the range of abusive behaviours that were in evidence in tenant accounts of their experiences and reflecting comments from various stakeholders who were involved in enforcement, housing options work, and in policing. This section uses the concept of a power and control wheel to describe the range of abusive behaviours. This concept is useful in underpinning the nature of abuse as a form of behaviour that extends beyond what might be regarded as mainstream dissatisfaction with the PRS. Tenant abuse is underpinned by the threat of eviction. This is a devastating outcome for tenants at the lowest end of the market: tenants are made destitute by the inability to secure alternative accommodation and – if the landlord has simply changed the locks – by the loss of personal belongings.

2.2 The nature of abuse: power and control

The range and extent of landlord-perpetrated abuse against tenants arises from the power imbalance between the two parties, which is particularly acute at the lowest end of the market. Here, tenants are generally accepted as occupying a relatively powerless position that landlords can exploit. One way of describing and explaining this abuse is to use a modified power and control wheel. This concept was developed in Duluth in the 1980s, as a means of understanding domestic violence.⁶

The wheel describes the way in which landlords use the threat of eviction and the likelihood of homelessness to exert control over tenants. The 'spokes' of the wheel describe the behaviours that landlords deploy to instil fear. Further exploitation can take place within this dynamic, where the landlord might extend the profitability of an abusive relationship by introducing elements of fraud and inducing tenants to commit crime.

Within this framework, abusive behaviour might also be perpetrated by other individuals, as permitted by the landlord. This could include family members and associates of the landlord, or other tenants in a shared property. Some unfortunate tenants were subject to abuse by the landlord *and* the letting agent, sometimes working in tandem and sometimes following their own agendas. The involvement of other malign actors increases a tenants' sense of powerlessness.

It might be argued that elements of tenant abuse discussed in this report are no different to commonplace PRS tenants' experiences of slow landlord response to repairs, or financial exploitation through charging high rents. As will be demonstrated in this chapter, tenant experience of abuse generally includes multiple types of manipulative control and exploitation which often lead to the tenant becoming afraid of the landlord and uncertain about the boundaries they might be willing to cross. One PSH officer noted a landlord who had many slum rentals but still visited each tenant to pick up the rent. This technique forced tenants into a position of personally accounting for a failure to pay and extended the landlords' ability to control through surveillance.

⁶ <https://www.theduluthmodel.org/>, accessed 4 Nov 2025.

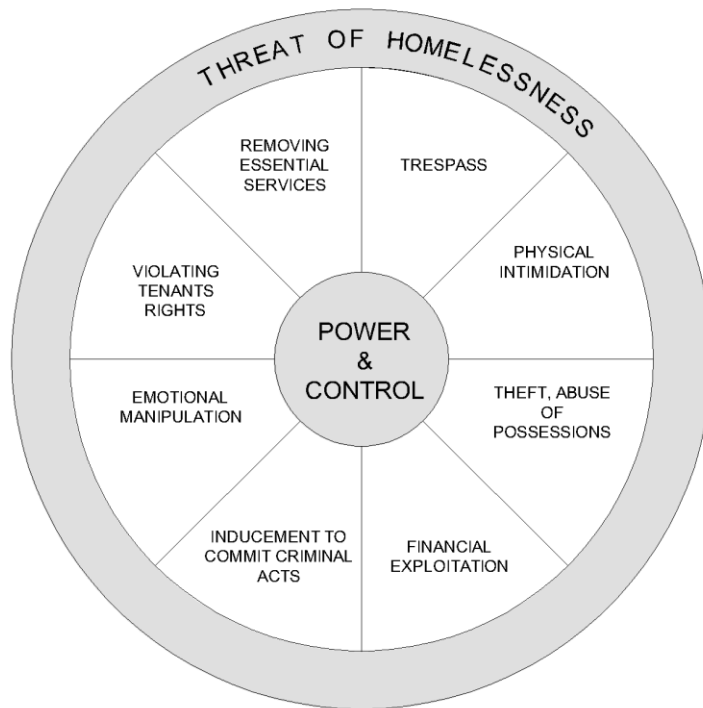


Figure 1 Landlord-perpetrated abuse power and control wheel. Source: adapted from the power and control wheel used in the Duluth model (see fn5).

2.3 Relying on the threat of eviction/homelessness

Abuse was predicated entirely on the landlord's ability to evict a tenant at will. This did not mean that the tenant would be served with a legal notice to quit. Often, the landlord would step up their abusive behaviour so that a property simply became unliveable, or a tenant thought their life was in danger. Tenants might, alternatively, be subject to preemptory lock-change eviction, risking damage to or loss of property and immediate homelessness.⁷ Safer Renting interviewee DW had lived in a house of multiple occupation (HMO) for six years. The landlord was extremely abusive, subjecting DW and the other tenants to multiple acts of coercion and a complete refusal to attend to any property repairs. DW was clear about the consequences of non-compliance, in relation to another tenant:

What she did for [name of another tenant], she took all the stuff, and she put in the corridor, and she changed the locks because he stopped doing what she wants. She also threatened tenants not to tell about the situation: she said if we say the reality, she will put everyone out, and people were scared about her.

DW reported that the landlord said, 'If I don't do what she wants, the door was open for me to leave'. Tenants were continually faced with this level of coercive threat. Safer Renting interviewee HD stayed for three years with an abusive landlord, who was slow to repair the property, pressured HD to work for no pay, would occasionally turn off the utilities, and failed to give HD a valid tenancy agreement. HD said that 'Anytime I put up the slightest struggle, I'd get "Hmm. I don't think this is going to work [HD]" type of talk which is passive aggressive behaviour'.

⁷ Carr et al., *Harassment and illegal eviction*.

2.4 Types of abuse

It was rarely the case that clear lines can be drawn between different types of abuse: for example, trespass might be regarded as a species of physical intimidation, in that the unwanted presence of the landlord in the property could feel uncomfortable. A merging of different kinds of abuse was evident with Safer Renting case LG, who was living in a shared property. The landlord had retained another room in the property for his own occasional use, which appeared to justify LG not being given a tenancy agreement. The landlord often turned up late at night, making lots of noise and demanding rental payments in cash, took furniture from her room, and occasionally turned off the hot water.

Trespass and/or invasion of privacy

Of all types of abuse, trespass was largely misunderstood by tenants who generally did not question the landlord's rights to be in the tenant's home. A couple in their twenties reported that their landlord insisted on repeated inspection visits that lasted up to three hours. Boundaries could be blurred in shared accommodation, where the landlord does retain rights of access to shared spaces, but not to a tenant's room without their express permission. Safer Renting case MB2 was a younger woman living in a shared property with a resident landlord who had another room in the house. The other tenants were mostly women. The landlord made a habit of going into tenants' rooms without invitation. The bathroom clearly had no lock, and he would wander in when he knew it was occupied. Safer Renting case LT, also living in a shared property, said that his landlord often turned up without prior notice, with family members, drunk and making a lot of noise. When residents complained about disrepair in the property, the landlord moved five other people into the house to 'make repairs'. The men held loud parties where drug use was in evidence; they were clearly there to frighten the tenants.

It was common for landlords to let other people into a tenant's home. Safer Renting case NE had been living above a shop: there were two floors above the shop, and two separate HMOs. NE's flat had eight or nine tenants. There was a problem with the facilities in the other HMO, and the landlord gave all the tenants in that property a key to NE's flat so they could share the bathroom there. In total, 13-15 people were sharing the same bathroom, which meant that some tenants were having to shower at work. NE was clearly unaware of who now had a key to his home. The landlord arriving at this 'solution' was disregarding his tenants' welfare and paying little attention to their privacy and security. When NE stopped paying rent in protest, a physical altercation ensued and he was subject to a lock-change eviction.

Trespass could also include the landlord erecting cameras in the property. Safer Renting interviewee BB said that her landlord had put cameras up in the common areas of the seven-bed house where she was renting a room. One of the cameras had been placed directly outside her door, angled so that it looked into her room when the door was open. BB was also expected to undertake 'surveillance' duties for the landlord, in reporting on the movement of other tenants in the property. NN was living with her family in a self-contained property. It was clear to her that, after a failed illegal eviction attempt, the landlord was coming into her home when the family was out. She believed that the landlord had hidden a camera in the bedroom, and she no longer felt safe in her home. All these types of 'home invasion' undermined tenants' feelings of security. Such actions made it evident to the tenant that they were powerless to prevent the landlord – or indeed, anyone – entering their home at any time.

Physical intimidation

Physical intimidation can include the landlord threatening violence to ensure that the tenant remains compliant. Safer Renting interviewee DW found her landlady physically threatening:

Actually, she pushed me in the kitchen. She and her daughter they did something against me in the kitchen, they push me, I was cooking, I didn't expect she was behind me. Then they pushed, and she had one big knife in the hand, big knife. Something like, "I kill you". When I saw that, oh, my God.

Safer Renting case ZI was told by her landlord that the letting arrangement with the agent had broken down, and she had to sign a new tenancy. ZI refused, and the landlord later returned without notice and changed the lock to her room when she was in the shower. She had to sign the contract to get back into her room.

The intimidation can spill into actual assault when the landlord decides that they no longer want the tenant. Safer Renting interview MB2's experience of trespass was certainly one where lines were crossed in terms of physical intimidation. The shared house she lived in started to empty – perhaps because of the landlord's behaviour, or because the property was unlicensed – and he increased the rent of the remaining tenants. MB2 refused to pay, and the landlord left a written notice to quit on her bed. When she confronted him about this, he physically assaulted her. Although MB2 asserted that she was not shaken by this assault, she still moved out to stay with a friend. In another case, another young woman – MB3 – was also subject to a physical assault when she fell into rent arrears. The landlord grabbed her collar, used vile language, and pushed her against a wall. She moved out soon after the attack.

Unwanted sexual attention

Physical intimidation can include unwanted sexual attention. Safer Renting interviewee AD had moved into a property in desperate circumstances: she had been evicted from a previous tenancy and was living in her car when she saw the property advertised in a shop window. The property appeared to be a good option: the landlord promised that it had been newly refurbished. AD was working at the time, and felt able to pay the £1,400 a month the landlord was asking for. AD told the interviewer that she had experienced childhood abuse, and found it difficult to deal with unwanted sexual attention from the landlord which began even before she moved in.

Really, really at the beginning, before I signed the contract, he was telling me how he was a director or manager of a shipping company and how women were jumping in his bed. It became really very unpleasant and unprofessional, but as I said, I don't know how to deal with the situation, and I don't know how to cut the conversation and say 'no' [Safer Renting interview AD].

Another time, he grabbed her arm and tried to kiss her. She pulled back and then later took the opportunity to tell him that she didn't want that kind of contact. He visited the flat and came into her bedroom regularly, made sexually inappropriate comments and claimed that physical contact was typical in his culture: '*We do greet with three kisses on the cheek*', but then he would also grab her hand and pull her towards him. His abusive behaviour extended to coercive acts that were intended to reduce AD's confidence. The safeguarding officer who was eventually assigned to AD's case was shown emails between AD and her landlord and said they were shocked at the level of verbal abuse they contained: '*he talked to me like a second-class, absolutely brainless person*'.

Theft, retention or (ab)use of tenant possessions

Landlord abuse extends to actions in relation to tenants' belongings. Landlords' ability to access property at any point means that a tenants' belongings are vulnerable. This is particularly the case in shared accommodation, where the landlord might claim that another tenant was culpable. Safer Renting case GB said that he returned home to find his room door wide open; cash and some belongings were missing. Other people in the property were – in GB's account – chaotic and probably drug users, but only the landlord had the key to his door.

In all the Safer Renting cases and interviews where the tenant was subject to a lock-change eviction, tenants lost immediate access to their belongings, and in many cases failed to secure access for months after the eviction. Almost all the tenants reported loss of property, indicating that landlords had rifled through belongings to steal cash and other valuable items. Very little attention is paid to landlord theft of tenant property. This crime is very difficult for the tenant to prove and is unlikely to garner an effective police response.

Other kinds of theft include the theft of utility supply. More than one tenant reported that their property was connected to business premises owned by their landlord, but their gas/electric meter was supplying the business. Safer Renting case SA lived in a flat above her landlord's business. He had rigged the property so that hot water for his business was supplied from SA's flat. Other modes of meter tampering were reported by environmental health officers, who said that meters could be fixed so that tenants were paying excessive rates for the electricity they used. Landlords were able to pocket the difference.

Financial exploitation

Many commentators argue that private renting is an innately exploitative financial situation. This presumption obscures the activities of landlords whose working practices include elements where money is extorted from the tenant beyond what might have been agreed at the start of the tenancy. Safer Renting interview ZI's protracted problems with her landlord included his coming to her room to claim a cash rent payment even though she had paid the rent already to the letting agent. A young couple who got a pet were charged additional rent by the landlord for the pet; they also insisted that the couple paid for twice-weekly cleaning at their flat, and that they take out pet insurance.

Financial exploitation also relates to the deliberate targeting of people whose characteristics mean that it is possible for the landlord to arrange that the housing support element of Universal Credit is paid directly to them (see Box 2:1). One PSH officer commented that landlords were becoming increasingly well-educated around the housing element of Universal Credit. Safer Renting case GB had been living in a shared house for around a year. Other tenants were wholly reliant on Universal Credit. The property was in acute disrepair, with a rodent infestation and overcrowding: eight or nine people were living in the four-bed house, and GB believed that they were all possibly drug users. GB believed that the landlord targeted that tenant type.

One PSH officer commented on a recent benefit fraud investigation that had taken place in their area, led by the Department for Work and Pensions. The investigation had targeted landlord-perpetrated fraud. It was found that some landlords, whose tenants spoke little English, were 'helping' their tenants complete benefit paperwork to ensure that the landlords themselves were receiving the benefit.

Other forms of financial exploitation included tenants being coerced into unpaid labour. Safer Renting interview HD was living in a shared house, and the landlord decided to let other rooms on short-term holiday lettings basis. HD was told that he would have to manage the lettings, including entering information on rooms in the house onto a booking platform, letting people into the property and clearing up after they had left. The landlord/tenant liaison officer reported that landlords in their area often required their tenant to work off rent arrears through manual labour. One tenant told the officer

he was actually working for the landlord daily. The landlord was paying him £60 a day for painting and cleaning his properties out, but he were taking £40 off him for the rent arrears. That's happening a lot [...] Modern-day slavery, to pay their arrears off. [...] Well, this particular landlord, he's got 49 properties across South Yorkshire, so you can imagine the maintenance that needs doing. The last one that I found him working at, he was actually laying a carpet in the living room. So to get this money back, because the landlords know that they're not going to get this money back, because they're on benefits, and unless they serve a

Section 8 for the arrears, and that's going to cost them again, it's easier to say, 'No, I'm not going to pay Joe Bloggs £100 to paint that kitchen for me. I'm going to use him, because he owes me money already [LTL-ABA01].

Prosecution case HIH-E, in Box 2:1, is a case of extended labour extortion.

Individual cases of financial exploitation shaded into more organised and larger-scale examples of modern slavery. Police worked closely with the Gangmaster and Labour Abuse Authority and mentioned multiple instances of trafficked labour:

So, for example, many of the car washes we go to now, when you find out where they're living, you will find that they'll all give the same address. You go to that address and it'll be a house of multi-occupancy, either recorded or not. It'll have 10 or 15 mattresses in the rooms and a lot of that's through either HMOs or through private landlords, but the GLAA are really on board with that [POLMAN11].

Box 2:1: Emotional manipulation financial exploitation – Prosecution case HIH-E

This case came to the attention of the local authority following a complaint from a member of the public. The complaint related to two elderly men who were living in a flat within a building that contained other untenanted self-contained flats. The property was in very poor condition. The roof was open to the elements, exposing the top floor, but the landlord was using rooms in the rest of the property as storage. He had persuaded the men to move into two separate flats in the property. Neither flat had adequate heating: one did not even have a boiler. He had a locked room in one of the flats that the tenant could not access, and it transpired that he was using this to store illegal items and quantities of cash.

The landlord persuaded one of the men to arrange a joint bank account with him on the understanding that the landlord would be his 'carer'. In actuality, the tenants were regarded as – in the PSH officer's phrase – a 'cash cow'. He would clear the account regularly as his tenant's pension came in. He also used the men as labourers, working to clear gardens and fill skips. He would pay them £5 a day or give them out-of-date food and clothing from charity shops. The men were clearly terrified of the landlord. One on occasion, one of the men whispered to the PSH officer who was inspecting the property 'Please get me out of here. I've got to go. I've got no money, I've got no life, I'm scared of him'. The man later claimed he was actually very happy: the landlord had clearly threatened him in the intervening period. The council managed to move the two men into other accommodation, but the landlord found one of the men, who he continued to use as free labour. He threatened the tenant, saying that he would always be able to find him.

Inducement to commit criminal acts

The project did not include any cases where landlords were directly inducing tenants to commit criminal acts. However, policing and local authority respondents mentioned the common occurrence of landlord behaviour drawing tenants into criminal activities, including moving tenants around properties to create multiple benefit claims, and falsifying tenant ID to evade council tax. There was passing reference to landlords inducing tenants to shoplift to pay the rent, but none of the respondents shared more direct examples. A landlord manipulating a tenant in this way benefits materially from the crime but also deny culpability and evade prosecution by being able to blame the tenant for the criminal act.

This strategy is particularly evident in landlord involvement in cannabis farming.

Police interviews that included reference to cannabis farming indicated the ambiguous nature of culpability, where blame could be attached to the tenant, the letting agent or the landlord.

Emotional manipulation

Safer Renting cases and interviews reported several ways in which the landlord sought to control their behaviour through emotional manipulation. A degree of coercion could be predicated on the landlord fostering a sense of loyalty. Safer Renting interview HD had, quite late in life, come out and thought he could trust his landlord, who was also gay. Other tenants felt they could trust their landlord because their ethnicity matched the tenant's. Safer Renting case TL had moved into some sort of cabin at the bottom of her landlord's garden; TL's English was not good, and her landlord came from the same part of the world. Soon after she moved in, the landlord began a programme of personal attack. He called her 'fat' and criticised her lifestyle, possibly to undermine her self-esteem. When she was out of the property, the landlord looked through her personal belongings and later used items that he had found to claim that she was a 'bad woman'.

Safer Renting case EB had moved into a property with his wife, also largely because the landlord had come from the same part of Eastern Europe and was 'like family'. Other people in the house were also from the same place. EB became unhappy with conditions in the property. Other tenants – also from the same part of Eastern Europe – began to pick fights with him. EB was evicted illegally, and it later emerged that the landlord was aiming to build a portfolio of properties with Eastern European tenants to 'avoid any repercussions' in terms of complaints. Safer Renting case SA, an older woman with a child, also had a landlord who shared her ethnicity. He would attempt to shake her confidence by leading evidence of folk curses at the door to her property.

Coercive control could also include threatening to misinform the authorities about some aspect of the tenant. This level of threat was particularly acute when tenants had children. It was common for landlords to threaten tenants that 'social services' would take their children away if the tenant complained about the landlord. Safer Renting case LG said that her landlord had been making allegations to the social services, that her son – who was only nine – had been dealing drugs at school. This landlord later attempted to force LG to leave the property by reporting her to the police, claiming that she had stolen furniture.

Box 2:2: Manipulation and financial exploitation – Prosecution case HIH-H

One of the prosecution case studies concerned a tenant who was a victim of financial exploitation and coercive control. The woman came to the attention of the local authority because of the introduction of a selective licensing scheme. The private sector housing team was visiting all properties in the area. Even from an external inspection, the property condition looked to be in breach of its license. The tenant was a woman who had learning difficulties and was – in the words of the PSH officer, '*struggling with life*'. The woman was extremely vulnerable and had no support. The property was uncarpeted, with little furniture. The woman kept a dog and cats but was finding it difficult to keep the house clean. She was meeting her rent payments through Universal Credit which was possibly being paid directly to the landlord and appeared to cover the full cost of the rent. However, the letting agent was also asking for additional cash payments that were sometimes collected from her by 'maintenance people' and sometimes delivered by her in person at the agent's office. The agent was well known to the local authority, in managing properties across the city in a similarly poor state; many of these were owned by the same landlord.

The local authority attempted to move the woman out of this property, but on the day of the move she was intercepted by the agent or landlord, who took the woman and her pets to another property some distance from her friends and family network. She was told on the

doorstep that if she did not sign a new tenancy agreement they would drive off and leave her homeless. She signed the agreement, and they left her with some of her possessions. The new property was, using the PSH officer's words, '*a hovel... basically falling apart. They'd moved her from one hell hole to another*'. It had no heating and no hot water and contained just a mattress and a sofa. The local authority inspected this second property. They threatened the letting agent with enforcement action, and the woman was moved a third time. By this time, it became clear that the landlord had removed and disposed of all the woman's possessions from the first property. The woman was persuaded to sign another tenancy agreement for the third property. She remains with the same letting agent. The local authority arranged some support and was prosecuting the letting agent for property quality issues.

Violating tenant rights

The violation of tenant rights was perpetrated in different ways. It could include simply misleading the tenant as to the nature of the tenancy. Safer Renting case UB had moved into a room in a shared property with her toddler child. The individual that UB was renting from presented as the landlord but was, in fact, a tenant who had rented the property as a single tenancy. UB lived there for around a year, until the superior landlord discovered the arrangement. The superior landlord then, in turn, attempted an illegal eviction via a lock-change. Safer Renting case ZI was also given a sham tenancy which included several illegal clauses such as a prohibition against applying for assistance with housing costs, and a £20 fee for every day of unpaid rent. ZI missed a rental payment, and after five days was told that – in accordance with her tenancy agreement – she had two weeks' notice to leave. She was also told that she was a lodger rather than a tenant, because the property was a serviced apartment. No cleaner ever appeared. Safer Renting interview MM said that the landlord had forged her and her husband's signature on a tenancy agreement and supported an attempted illegal eviction with fake documents from the council and from the bailiff's office.

These kinds of violation of rights generally shifted the balance of power further into the landlords' favour, creating circumstances where it would be difficult for the tenants to make a claim against the landlord.

Removing essential services/controlling tenants' living conditions

Academics reviewing practices in Europe have identified 'milking' properties as a criminal landlord tactic: that landlords will extract as much benefit from a property as possible – via rent – without making the required investment in terms of repairs or maintenance.⁸ 'Milking' is a form of exploitation.

Almost all the Safer Renting clients who were included in the study lived in property that was in chronically poor condition, and where those conditions were deteriorating. Safer renting case MM had lived in this kind of property for more than five years. She moved in because the flat had lift access, and she had mobility problems. However, property conditions deteriorated rapidly when the landlord took over direct management from the agent. There was internal water leakage including from the bathroom, which was causing a bad smell, and the landlord refused to attend to the broken boiler. Rubbish was allowed to pile up outside the windows. At the time of the interview, she was still living there, still paying the rent, and the landlord was still refusing to attend to the repairs.

Landlords offer no explanation for property disrepair because they are aware that the tenants they are targeting have no other options. Landlord control can be extended by interrupting

⁸ P. Kupka, V. Walach. & A. Brendzová, A. (2021) 'The poverty business: illicit practices and reproduction of disadvantaged communities in Czechia', *Trends in Organized Crime*, 24: 227-245.

the utility supply. Usually this means that tenants are suddenly deprived of heating or hot water. This could also include disrupting the wi-fi, so that tenants who would normally expect to be able to work at home then found it difficult. A landlord dictating a tenant's living conditions is a means of exerting control by demonstrating unpredictability. This was one aspect of abuse that could be notched up to make a property entirely unliveable, if the landlord decided that they wanted a tenant to leave.

Another method of controlling property useability was forbidding tenants to use part of the property. Safer Renting case NB was living in a room in a shared house. He was subject to various types of emotional manipulation, which included the landlord being complicit in bullying from other people within the flat. NB was told to keep all their kitchen equipment in his own room and then banned from using the kitchen at all. Landlords also took space in a property that was let for the tenant's sole use. In prosecution case HIH-E, the landlord used one of the rooms in his tenant's flat to store illegal items and cash.

2.5 Illegal eviction

Abusive landlords will want the tenant to stay in the property, but the point at which the tenant becomes non-compliant, stops paying the rent, or the letting no longer serves the landlord's purposes triggers an increase in the level of abuse, to induce the tenant to leave. The tenant leaves because they feel that their life is in danger: the landlord may have offered a personal threat or sent people to break into the property and tell the tenant to leave. The landlord might simply make it impossible for the tenant living in a property, by removing essential bathroom equipment, taking down internal doors or cutting the utility supply entirely. Worse, the tenancy might be ended when the landlord effects a lock-change eviction, leaving the tenant without a home and without belongings.

Box 2.3 Safer Renting interview DW

DW moved into a single room in a shared property after being evicted illegally from another property where there had been an illicit rent-to-rent arrangement and the landlord found out. She had been given two weeks to leave and had found a new room that was advertised on gumtree. She lived in this property for around six years. Initially, the landlady seemed lovely, and DW felt lucky. However, problems emerged very quickly. DW was given a sham tenancy agreement: *almost everything was illegal because it says that she live in the house with us. She never live there with us, never. ... She said I was a lodger.* The landlord tried to insist that DW pay the rent in cash. The property had five bedrooms, but at some points up to ten people were living there. Everything in the property was broken, the heating did not work and the bathroom door was broken. Another tenant purchased a microwave for everyone to use. The bills were inclusive, and the landlady nagged the tenants to reduce their electric and water usage, indicating that they should take showers at work. The landlord was prepared to evict tenants illegally by changing the locks. This happened to the tenant who had purchased the microwave, and who had stopped doing what the landlord wanted. The tenants were terrified of the landlord, who threatened to evict everyone if they told the authorities what was going on. DW was physically threatened in the kitchen by the landlord and her daughter, who was holding a knife.

DW had moved into the property in a fragile state: she had suffered a recent family bereavement. The landlord found out that DW was taking medication for depression and started to manipulate her. DW was expected to clean the house and to report regularly on other tenant's behaviour: the landlord called constantly, wanting to know when other tenants were out of the

house. If DW did not respond promptly, the landlord would become aggressive. She would visit the property and go into tenants' rooms and take valuable items. DW became more anxious about the landlords' behaviour. The landlord told her, *'If I don't do what she wants, the door was open for me to leave'*.

DW fell behind with her rent when she lost her job, and the landlady took her to court. DW was supported by Safer Renting, and the landlord was convicted of various offences amounting to a fine of £7,000. At this point, DW was still living in the property because she had nowhere else to go. All the other tenants had left: some had offered evidence against the landlord. The landlord finally forced DW to move by breaking up the bathroom and the kitchen to make the property unliveable.

Is incredible. I don't have words to describe. For me, she is like... Let me see if I can say this word in English, but really bad person. [...] You know when someone doesn't have feelings, and they just do whatever they want, they don't care about...

The threat of eviction underpins all other elements of abuse. The possibility that the landlord might resort to illegal eviction constitutes an even higher level of threat. The landlord changing the locks or in some other way preventing tenants from accessing their accommodation means that they suffer an immediate loss of home and the loss of all their belongings. Given the tenant's marginality in the housing market, it is entirely likely that they would then suffer a period of street homelessness or – where family and friends are available – precarious sofa-surfing. This means that the threat of eviction is also a threat of destitution. A tenant being aware of the extremely poor nature of local authority responses to homelessness (see Chapter 3) would further enhance a feeling that no legal remedy would be forthcoming. The associated report *Are the Civil and Criminal Remedies for Harassment and Illegal Eviction Fit for Purpose?* deals with tenant experience of illegal eviction in more detail.

2.6 Impact of abuse on tenants

Landlord abuse, experienced over an extended period, had long-term negative mental health impacts on the Safer Renting clients. It is important to note that landlords whose business models are based on some degree of tenant abuse are more likely to seek tenants who they feel able to manipulate. This means that, often, tenants experiencing this crime start the tenancy with an increased vulnerability to harm. Two of the Safer Renting interviewees reported that they had started their tenancy with mental health problems that were exacerbated substantially by landlords who were aware of the impact their actions were having. Safer Renting interview DW (see Box 2.3) said that she was deeply affected by her experience and still had bad dreams about her landlord. She has moved into a more settled tenancy and a house she loves but even so she is apprehensive that the same thing will happen again.

Violation of home and self

The fact that the abuse takes place within a tenant's home adds substantially to its impact. Home is often regarded as an extension of the self. Research on the impact of domestic burglary indicates that home intrusions are particularly traumatic because they undermine a belief that the self is in some sense inviolable. Outcomes can include several psychological stress indicators that can result in physical health issues and behavioural problems.⁹ The Safer Renting accounts indicate that

⁹ Kunst, M. and Hoek, D. (2023) 'Psychological distress amongst domestic burglary victims: a systemic review of possible risk and domestic factors', *Trauma, Violence & Abuse*, 25:1, 430-447.

trespass included multiple instances of the landlord handling tenants' private property while they were out. This engendered a sense of violation and increased insecurity.

Diminished self-esteem

Safer Renting interviews indicated that experiences had an impact on clients' self-esteem. Some blamed themselves for being naïve or susceptible to exploitation. Safer Renting interview BM3 said that he had moved into a place in an *'act of desperation'*:

I kind of rushed into it, I didn't even examine everything. Yes, just really needed a place to get to and to stay short-term, and so I took, so I was on SpareRoom and just looking for some rooms I could afford and yes, just messaged a bunch of landlords and this one got back to me and accepted my sort of three months up-front payment. Which I guess is, was quite rare, and looking back, it was maybe too good to be true, because they turned out to be very dodgy.

The property was in extremely poor condition, and BM3 was later tricked into leaving his room by a colleague of the letting agent pretending there was a serious leak. He was then locked out: *'The whole experience was just awful, but it did make me also beat myself up for being so gullible and stupid'*.

Safer Renting interview NB had lived for four years in a shared property, where he was subject to ongoing abuse from the landlord. This abuse included the landlord interrupting the wi-fi supply, interfering with NB's possessions when he was in hospital, and forcing NB to keep his window closed. The landlord also prevented NB from using the shared kitchen and obliged him to keep all their kitchen equipment in their own room. This long period of abuse came to an end when other people in the household said that they wanted NB's room for another family member, and NB's health meant that he was finding it difficult to pay the rent. He was subjected to a lock-change eviction, with no access to his medication. The landlord's actions had a substantial impact on NB's mental health: *'he just make me realise that I am nothing; anybody can do anything to me. I'm that vulnerable now because of that person'*.

Another Safer Renting interview – AD – said that her experience of unwanted sexual attention from her landlord over a period of two years led to her self-harming while she was living at the property. She was eventually assigned a safeguarding officer.

'Hyper-precarity'

Tenants living in the shadow private rented sector experience chronic precarity. Their home is not a place of comfort and security. Reports of serial illegal evictions were not uncommon: tenants were forced into taking a poor-quality rental after being illegally evicted, only to suffer the same outcome. *'Hyper-precarity'* means that the tenant is living in constant fear of domestic repercussions from a landlord whose behaviours are difficult to anticipate. Tenants know that the landlord could choose to turn off hot water, heating, or the wi-fi at any time. This meant that tenants are forced to be alert to any change in the landlord's demeanour, and to curtail any kind of action that might provoke a negative reaction.

Powerlessness

Tenants could do little to influence their landlord's behaviour. The accounts from Safer Renting have been secured precisely because these tenants did approach the authorities for assistance. Even in these cases, tenants found that their situation was not always materially improved by their seeking help. For example, even where referrals were made to the authorities, tenants were still subjected to interrupted utility supply, harassment and attempts to coerce tenants to leave. Property conditions did not improve. Feelings of powerlessness were underlined by dismissive responses by the police and by statutory authorities (see chapter 3). Safer Renting case LG's

landlord had been served with an injunction but was still interrupting the hot water supply and had continued his programme of harassment which included repeatedly reporting LG to the police.

The powerlessness also reflected the fact that tenants had little alternative but to remain where they were. Tenants who had been referred to Safer Renting were often still waiting for another property to become available and were continuing to suffer harassment and abuse because they had nowhere else to go. Given the fact that their previous search had turned out to be a poor choice, it is not surprising tenants were wary about rushing into what might turn out to be another exploitative letting arrangement.

Fear

Protracted experience of manipulation, coercion, unpredictable trespass and – in some cases – physical threat could engender fear that tenants did not stop feeling after their tenancy came to an end. One Safer Renting interview – a woman who had been subject to a physical assault – did not want to live in any kind of HMO again, because she knew that the landlord had a legal right to access the shared space.

Inability to protect children

Many of the tenants in the Safer Renting case notes and interviews had children: in almost all cases these were aged 12 or below and included very young babies and toddlers. Parents were living in circumstances where they could not protect their children from landlords' abusive behaviour. One mother reported that her children were frightened of the landlord, who entered their home unexpectedly and left doors open.

Conflict between the tenant and the landlord could lead to shouting and loud noises, and children were witness to physical altercations between adults. Safer Renting case BV, whose landlord's abuse culminated in an attempted illegal eviction, had a newborn baby in her arms when four men suddenly came into her kitchen and told her that she had 24 hours to leave. Much of her distress in recalling the incident related to her baby's crying and her own helplessness.

The landlord did not need to be present to have an impact. Children experienced heating and lighting suddenly becoming unavailable, intermittent hot water supply, rodent and insect infestation, and their parent's own stress and anxiety. It is not difficult to imagine that parents found it very hard to explain these circumstances to their children, in ways that did not underline the fact that they were powerless to make things better.

Physical and mental health consequences

This combination of negative experiences had physical and mental health consequences. Some clients reported that medical conditions had worsened because of their rental experience. The Safer Renting interview and cases included clients whose household included a pregnant woman. Being subject to abusive behaviour had an impact on the pregnancy. Safer renting case LT, whose landlord was deliberately intimidating tenants in a shared house by letting in strangers, said that another tenant was forced to move out because the stress was affecting her pregnancy.

Mental health impacts were evident. Safer Renting case TL was a woman with a small baby, who was living in a property attached to her landlord's house. She had been subject to a long period of harassment and intimidation including hearing – through a party wall – her landlord and his wife talking about her. The property was damp and mouldy, and the landlord controlled her electricity, heating and hot water supply, turning these off for long periods. This behaviour was affecting her ability to take care of her baby. When Safer Renting spoke with her, she became deeply distressed and wept about her situation. She did not feel that anyone could resolve the harassment because she could not offer any evidence, and in any case no longer wanted to stay in the property. In the end, she moved out into accommodation that was clearly not affordable and was borrowing money from friends to pay the rent. TL did not mention the state of her mental health when she entered into the tenancy but a long period of abusive name-calling, manipulation and sudden changes to

her living conditions clearly had an impact. By the time the landlord had engineered an illegal eviction, she was so suicidal that she was assigned an adult safeguarding officer. Safer Renting interview AD was so impacted by her landlords' sexual harassment and problems with her accommodation that she began to self-harm and attempted suicide.

Landlord abuse also had impact on children in a household. Multiple reports have indicated the impact of poor property conditions on children's health. Within the Safer Renting narratives, children were very often living with Category 1 hazards and vermin, in houses where their parents could not control who came through the front door. Two of the Safer Renting interviewees said that their children suffered anxiety because of their experiences: one constantly revisited an incident where he witnessed the landlord shouting abuse at his mother; another mother said that her child had started bedwetting.

2.7 Conclusion

This chapter has described in detail tenant experiences of landlord abuse. These experiences often lasted for years. Types of abuse varied, and many overlapped. All created circumstances in which the tenant was subjected to levels of control that undermined their sense of security and self-worth. Landlord control of a tenant's living conditions created a position of enhanced precarity where a failure to comply could lead to interruptions in utility supply. Levels of financial exploitation indicated that landlords viewed their tenants as 'cash cows', useful as long as they were able to pay the rent. Recourse to illegal eviction constituted a threatened loss of both home and belongings, and the likelihood that a tenant might become street homeless and destitute.

3. Statutory and legal responses

3.1 Introduction

This section reflects on statutory agencies' awareness of landlord-perpetrated tenant abuse. The broad nature of behaviours indicate that statutory awareness might be spread across local authorities in separate teams including private sector housing teams, housing options, trading standards' financial exploitation units and adult social services. This report covers officer responses amongst private sector housing professionals and homelessness teams only. Respondents occasionally made references to some types of abusive behaviour but did not readily identify 'tenant abuse' as a type of landlord criminality. Enforcement officers rarely alluded to tenant experiences of landlord criminality and mentioned tenants most often in terms of their unwillingness to support landlord prosecution. When asked about routine partnership working within the local authority, private sector housing officers did not mention adult safeguarding teams. Housing options teams most often referred to privately renting tenants in terms of their problem behaviours.

Tenant reflections on their engagement with statutory authorities amounted to dismay and disappointment in a lack of interest in their problems. It appeared that maintaining a tenancy was more important than protecting a tenant from ongoing abuse.

3.2 Statutory agencies' awareness of abuse

'Tenant abuse' was not necessarily badged as such amongst the statutory interviewees, but local authorities did show awareness of some of the abusive behaviours outlined in the previous chapter. Housing law concentrates local authority attention on property conditions, which means that environmental health teams and housing options teams were very likely to be acquainted with landlords letting extremely poor-quality properties. A private sector housing officer in one of the more rural local authorities in the case study area commented:

So we know there's these things going on but we just can't get the evidence. It's just a couple of landlords, to or three landlords who are like that. But everyone knows that they're like that. They know what they're doing, they've been doing it for so long. They skirt along that line of what is and what isn't ok [PSH-KLKE01].

Tenants were rarely acknowledged as the ultimate victim of this kind of behaviour. The majority of the private sector housing team interviewees gave only passing mention to tenants. Housing infractions were most often discussed in terms of the relationship between the local authority, the landlord and the law. The property itself was judged in terms of its compliance or non-compliance with regulation, but the tenant experience within that property and in relation to the landlord was rarely an immediate concern.

A slightly tighter focus on the tenant came in discussion of illegal eviction. Local authorities were aware of cases of harassment, particularly where that case led to an illegal eviction that met the local authority's criteria for prosecution.¹⁰ Local authorities enforcement teams were not attuned to the longer-term abuse that very likely predated the harassment action that intended to oust the tenant from their home.

¹⁰ Carr et al., *Harassment and illegal eviction*.

Enforcement teams sometimes worked with the Department for Work and Pensions, in the investigation of benefit fraud. One officer identified a pattern of behaviour that included fraudulent exploitation and extorted labour:

The landlords are quite happily bringing people in, setting up HB, setting up all the tenancy and using those tenants as black labour at the same time. Basically, once you are a landlord you have full control of that individual, particularly if they're a vulnerable individual. You're finding people work and setting up the housing benefit. And you're then taking off them any other benefit they might be eligible for. Then you are taking the wage from the black labour and giving them back a small allowance to live on [PSH-LML01].

Doubts could also be cast on other more routine arrangements within the benefit system. Landlords operating within the housing benefit market are aware that, where a case can be made that a tenant may not have the capacity to arrange rental payment, the housing element of Universal Credit can be paid directly to the landlord. These are called 'Alternative Payment Arrangements'.¹¹ For some landlords operating with good intent within this market, this is a means of ensuring that tenants with mental health difficulties or addictions do not fall behind with their rent and achieve a degree of tenancy stability.¹² However, this arrangement carries limited scrutiny and can be exploited for less benign reasons:

I'm aware that we've got certain landlords who would take their tenants to DWP and say, "Can we get this transferred so it's directly to me?" So they get direct payments. They do that with all of their tenants. And it's little things like that, where you go "I don't know if that's...it's not really..." [EPH-KLKE01].

These quotations indicate some degree of awareness of the coercive nature of landlord control. No comment at all was offered on supporting tenants who were subject to this level of manipulation.

Housing options teams were more likely to be aware of problematic landlord behaviours which might lead a tenant to seek support from the local authority. One homelessness team officer noted problems facing migrant households:

I think a lot of the stuff around exploitation, undoubtedly is going on amongst possibly migrant households we've seen, particularly where there's a lack of status in the UK. We're aware and we probably might touch on a bit more detail around where you've got HMOs unlicensed, possibly unregistered, probably not fit for habitation, but being left to people with no status, so with no right to rent. That's very much under our radar. We don't really always know about it until a problem occurs that means we know about it [HOP-GHGo1-03]

The team also acknowledged that this problem extended beyond this group:

I do think there's probably some exploitation in very poor landlord behaviour of tenants that do have recourse [to public funds], but they don't come to us for support. They just maybe move from one crappy landlord to another, without coming across our threshold in terms of a service. I don't think we can say we know the full extent, the full picture of that poor behaviour [HOP-GHGo1-03].

This level of detailed comment was unusual amongst the housing options interviews.

¹¹ <https://www.gov.uk/government/publications/universal-credit-alternative-payment-arrangements/alternative-payment-arrangements>, accessed 5 Nov 2025.

¹² J. Rugg & A. Wallace (2021) *Property supply to the lower end of the English private rented sector*, Nationwide Foundation/University of York.

It is reasonable to conclude that the types of behaviours that constitute tenant abuse are known to authorities but are not necessarily badged as such. Legislation recognises discrete elements of infraction such as a failure to attend to an improvement notice or illegal eviction, and resolution is focused on achieving compliance. Statutory intervention is not directed towards protecting tenants from what can be a long-term abusive landlord situation, where elements of emotional manipulation are not immediately visible or easy to evidence.

Policing interviews indicated an awareness of tenant abuse that might be taking place in relation to levels of criminality associated with cannabis production and modern slavery. Police respondents, understandably, did not characterise criminals involved in this kind of activity as 'landlords' specifically even though letting property was actively facilitating those types of crime. Mentioning 'landlords' tended to evoke the immediate response that any criminality under that heading was a civil issue. Police respondents made little reference to tenants. One officer noted that properties causing a disturbance might come to the attention of police in terms of anti-social behaviour, in which case an attempt might be made to work with the council to effect a closure order.

The willingness of both police and local authorities to intervene was tempered by professional knowledge that – as indicated below – there was no guarantee of a positive outcome for the tenant. One police respondent indicated that they had intervened in a case where a rental property was being used by sex workers. The property was subject to a closure order, but the officer was ambivalent: *'where do the women go? You're in effect putting them on this [...] in effect you're almost making somebody homeless, aren't you?'* [POLFL08]. The local authority officer who had intervened in the case reported in Box 2:2 admitted that their intervention had led in the short term to the tenant losing her home and most of her possessions and being placed in accommodation that was far worse than the first property that was inspected. In the medium and longer term, the tenant's vulnerability had been flagged to social services and her housing situation did improve materially although this did mean continued letting with the same abusive letting agent.

3.3 Reporting abuse and the statutory response

Local authority officers often concluded that the scale of tenant exploitation by landlords is hidden. However, all the Safer Renting cases and interviewees had approached local authorities or the police to report their experiences and seek support. This section considers the experience of reporting and the likely local authority response in tandem, and in doing so points towards some of the reasons why an individual tenant might over time become increasingly unwilling to approach the local authority for help with their landlord. It appears that intervention in this part of the market creates a reinforcing negative spiral:

- People in abusive tenancies are unlikely to approach local authorities;
- Problems that are reported to the local authority are often dismissed, or the tenant blamed for the situation they find themselves in;
- Where local authorities respond, the priority is often to maintain the abusive tenancy; if the tenant is moved, one abusive rental situation might be replaced with another;
- Abusive landlord behaviour becomes normalised or even expected; cycling back to:
- People in abusive tenancies are unlikely to approach local authorities

Reporting to local authorities

Landlords' manipulative practices mean that tenants can find it very difficult to approach local authorities with evidence of abusive behaviours. Emotional manipulation, verbal and physical threat leave no material traces, and tenants did not feel confident that their account of events would be

favoured over their landlord's. It is notable that action was more often taken in cases where an onlooker was able to film the landlord threatening or assaulting the tenant. Indeed, in Safer Renting interview KC's case this led to the landlord being jailed because of the violence of his behaviour.

Tenants could be left uncertain about where exactly their complaint should be lodged. It may not be clear to a tenant which local authority service they should approach with the difficulties they may be having with their landlord. Reporting mechanisms could be complex. Tenants, on reaching a stage where levels of abuse might have seriously compromised their self-esteem and created a degree of anxiety, faced a multiple options too confusing to navigate. One housing options officer summarised their local pathway into the service, voicing a degree of exasperation:

Yes, they can contact us in a number of ways. Yes, they can phone up and go through the 900 stages of the council's switchboard and eventually get to speak to somebody. They can call into the office. We can provide a drop-in service. Depending on their circumstances, they may or may not be seen straight away. They may even be put on a courtesy phone to speak to someone internally, or they might be signposted and given an appointment later one, something like that. Also, I mean they can try and work out our website. There is an online way so people can refer themselves into us as well [HOP-KLK01].

Safer Renting interview UY recounted his experience of trying to secure help from his local authority:

When I was in [borough name], they have a web page on their website that says if you're experiencing eviction or harassment, then call this number and send an email to this address or whatever, but it actually doesn't...It says when you call it, it says, oh, you have to call this number, and then you call the switchboard, and then you go through the whole chain of options, and then you get back to it. It's just the licensing, private sector licensing. They don't have any tenancy relations officers anymore.

Tenants' experience pointed towards local authorities being less than responsive. Safer Renting interviewee NB reported that he physically went to their council office when he was evicted. He was there for the whole day which they found difficult because a health issue made it painful for him to sit. He returned on multiple days to find out whether his case was progressing, because calling on the phone seemed to get him nowhere: 'They said "oh, we will contact you" but nobody ever contacted'. It is notable that the tenant whose abuse was reported in Box 2.1 had personally reported her property's condition to the local authority enforcement team several times and had zero response; the case was only picked up when officers visited the property during routine selective licensing inspections.

Problems being dismissed, or tenant being blamed

Tenants who took their problems to the local authority found that their cases were dismissed in several different ways. Tenants' complaints and a refusal to return to a PRS tenancy was often interpreted as a technique used by the tenant to try and secure a social housing tenancy:

We have tenants not really wanting to go back. They actually want us to get an alternative for them, which is more stable and more suitable and more affordable for them, which is social housing properties [HOP-HIH01-02].

This technique was regarded as both knowing and naïve: complaints could be an attempt to 'game' the system, or a reflection of a tenant's failure to understand the pressure of demand for social housing placements. Safer Renting interviewee AD reported feeling 'let down' by the system. She

was living in a property that was extremely cold, although the landlord persistently denied the problem, and suffering sexual harassment.

I've actually spoken with [name of council] and they said "Well, there's not much we can do. We've been there, seen the pictures, and you are living much – in better shape than a lot of people who come here, so what are you actually complaining about?"

She was told "Well, you are by yourself. You don't have a kid. Yes, we are sorry that you are unwell, but there are thousands of people in our queue, and that queue is not getting shorter". It was only after she had begun self-harming and attempted suicide that her case was referred to the local authority safeguarding team.

Housing options teams' immediate response to a complaint was to review the degree to which that tenant was at threat of homelessness. A tenant is most likely to approach the local authority when the landlords' behaviour has descended to harassment because they want to provoke the tenant to leave. A tenant with no prospect of alternative accommodation may then approach the local authority. If a tenant cannot provide a valid notice to quit, the local authority is likely to conclude that the tenant is not at risk of homelessness because the landlord cannot defend their action in court. Criminal landlords have no intention of using court procedures. Safer Renting case BB approached Citizens' Advice after her landlord told her to leave. She was told to go to the council:

I booked an appointment, and I went in the next day, early, early morning, I think I was the first there. I spoke to somebody at the [unclear] and they said that they can't do anything until she chucks me out, so I'm not homeless until she's done the deed, like literally let me go. She still had to serve me a Section 21 or something like that. I told her, after the appointment with the council, I told her was she able to give me a letter that I can give to the council? Maybe they can help me. She refused, she said she'd have nothing to do with the council, she doesn't care, she doesn't want to deal with the council.

BB was then thrown out of her home by the landlord, who changed the locks. It is not unusual for a tenant telling their landlord that a notice to quit is invalid to experience then an increased level of harassment to force the tenant to leave, or a lock-change eviction.¹³

A tenant complaining about their landlord's behaviour, but who has not been served a notice to quit is not seen as an individual requiring support. A referral might be made to the private sector housing team if the tenant complaint relates in any way to property quality. Local authority enforcement action rarely takes a broader view of the landlord/tenant relationship. This project's review of prosecution cases indicates that some interventions take months to resolve, leaving the tenant in much the same position as before. Safer Renting case SA indicated that even though the local authority PRS housing team had visited the property and the landlord was under some degree of scrutiny, the landlord was still controlling the tenant by intermittently cutting off the utility supply.

Local authority willingness to support a tenant in part reflected the commonplace view across different services that the tenant was in some respect to blame for their circumstances. Tenants in the shadow PRS have been excluded from the mainstream market because of personal demographic characteristics. These characteristics then become an explanation for further victimisation. For one officer, *'sadly, the people who are mainly illegally evicted are at the bottom of society who live sometimes quite chaotic lives. And most evictions are "he said, she said"'*. Here, the inference is that tenants subject to illegal eviction are unlikely to present well in court, and so local authorities lose interest in delivering ongoing support.¹⁴ The landlord/tenant liaison officer said that

¹³ Carr et al., *Harassment and illegal eviction*.

¹⁴ *Ibid.*

they sometimes found it difficult to secure help for tenants from housing staff: *'There are lots of different types of abuse. I know I shouldn't say this, but it can also not be just from the landlord. It can also be from people who are supposed to be supporting them'* [LTL-ABA01].

Local authorities maintaining an abusive tenancy, or replacing one abusive landlord with another

Local authority homeless teams' initial responses to tenant complaints about a landlord tend to prioritise mediation. Here the guiding principle is to ensure that the tenancy does not end in a way that burdens the local authority with a homelessness relief duty: *'Our prime purpose is to try and keep people in those properties, if possible, and prevent there from being an illegal eviction. That's what we try to do'* [HOP-OPO01-02]. Here, the presumption is always that a failure in the tenancy requires the local authority to work with the landlord to mediate the tenant's problems:

Our first steps, as always, will be to try and sustain that tenancy through negotiations, by trying to support with any rent arrears or putting support in place. Whatever it may be to support that tenancy. Where that's not successful, then we would start to look to support that customer to find alternative accommodation. The likelihood is that they will be back within the private rented sector [HOP-HIH01-02].

Local authorities were aware that there were landlords that, in one housing options officer's view were *'not to be worked with, if you like, so we wouldn't refer a tenant to them if we were planning to relieve someone's homelessness'*. Other local authorities were quite willing to use landlords who were *'a little bit out of order'* on occasion, but who were prepared to accommodate tenants referred by the rough sleeping team, and who had more problematic behaviours:

I think we have certain landlords who – we have some landlords, a very small amount, who don't take any crap basically. [...] So it's a difficult relationship with them, in the sense that they're not always squeaky clean but then they will take some of our more difficult, chaotic customers [HOP-OPO01-2 with PSH-OPO02].

In instances where a local authority might be more proactive in taking an enforcement approach, an improved housing outcome for the tenant was in no way guaranteed. This was particularly the case for individuals who had no recourse to public funds. As one officer indicated, *'even if they were to approach us for help, that might result in their loss of their accommodation, and we wouldn't be in the duty to replace it with anything'*. The enforcement action might lead to property improvement in the longer term, but in the short and medium term, tenants might well find themselves homeless. This is often the case where an unlicensed or overcrowded HMO comes to the attention of the authorities: intervention can provoke a spate of coerced and lock-change illegal evictions by the landlord under scrutiny. Tenants are unlikely to come forward to seek assistance in these circumstances and many – in desperate need for new accommodation – end up in another abusive tenancy.

Abusive landlord behaviour becoming normalised

In the words of the housing officer cited earlier in the report, tenants' housing experience is little more than movement *'from one crappy landlord to another'*, without that tenant ever coming to the notice of the authorities. Safer Renting case notes and interviews indicated that serial movement between abusive renting situations, provoked by serial illegal evictions, was a common occurrence. Notably, tenants could begin to blame themselves for making poor choices, being taken in by landlords who initially appeared supportive but whose behaviour later changed, or taking up options that appeared in retrospect to be too good to be true. It was not unusual for tenants to regard these experiences in terms of good or bad luck rather than concluding that the landlord was

entirely responsible for their behaviour. Indeed, faced with a general lack of interest in landlord prosecution amongst statutory authorities it is not surprising that tenants might conclude that abusive behaviour was an expected characteristic of renting at the lowest end of the market.

This degree of normalisation then becomes another reason for blaming the tenants for their housing circumstances. One senior housing officer, exasperated by local unwillingness to report vermin infestation in a particular neighbourhood commented '*the people that live there are so... they've got such a low expectation that they just accept that this is how they must live*'. [PSH-LMLo1].

3.4 Conclusion

This chapter has indicated that, although statutory authorities do recognise the likelihood that tenant abuse by landlords is taking place at the lowest end of the PRS, there is little evidence of meaningful intervention. Local authority powers and duties that are directed towards landlord practice focus on property condition and illegal eviction. In both cases, interventions are not directed towards identifying more broadly abusive behaviours. Tenants who approach the authorities are subjected to gatekeeping strategies that reflect local authority's operation under extreme financial and resource constraints. However, constraint does not preclude authorities from identifying ways in which their practices might actively contribute to further exploitation of tenants whose accommodation options are extremely limited.

4. Recommendations

4.1 Introduction

This report concludes with some recommendations which aim to improve the level of support offered to tenants who experience landlord abuse. In the circumstances of a rental tenancy, tenant abuse is a set of behaviours that might not be amenable to a single type of intervention. However, it is first necessary to recognise abuse as a mode of criminality. Statutory officers often regarded abusive behaviour as a somehow inevitable characteristic of rental at the lowest end of the market and tended to blame the 'housing market' rather than landlords specifically.

It is appropriate, next, to consider how statutory authorities might best respond to tenants who have experienced long-term abuse within a letting relationship. This abuse, particularly when it culminates in coerced or sudden illegal eviction, can carry long-term mental health impacts. The concept of trauma-informed service delivery is a useful framework for considering how statutory authorities should modify their engagement with tenants who have lived in the shadow PRS.

The chapter, finally, considers two alternative legislative approaches to tenant protection from landlord abuse.

4.2 Recognising tenant abuse as criminality

The very lowest end of the private rented sector – the shadow PRS – operates to the extreme detriment of many tenants. This report has recognised that a landlord's decision to 'milk' their property is very often supported by levels of tenant abuse which bind the tenant to a rental arrangement through emotional manipulation, misinformation and threat. Further options for exploitation – including fraud and inducements to criminality – can add to the profitability of the arrangement for landlords.

There is a high degree of tolerance for these types of behaviour, which have become largely normalised. In the words of private rented sector team officer:

The number of properties that someone on benefits could afford to rent in [this town] is miniscule. The chances is really low and that's why we have a lot of people once they're in a property, if that landlord's rogue and he's not running their property [well] there's a reluctance for them to come forward because where else are they gonna go? [PSH-ABA01].

Here, the argument appears to be that victimisation of tenants is an inevitable consequence of dysfunctionality at the lower end of the market. Blame is placed on the market, rather than on the landlord who has made a conscious decision to operate in ways that are entirely detrimental to tenant welfare. Slum and scam landlordism¹⁵ both rely heavily on elements of tenant abuse. This report strongly suggests that recognising tenant abuse as criminal behaviour constitutes a major and necessary step towards devising effective protections.

¹⁵ L'Hoiry et al., *Criminal landlords*.

4.3 Recognising abuse, and recognising abuse as trauma

Local authority interviews with enforcement staff and housing options teams offered no evidence that working practices recognised landlord abuse of tenants, or that the abuse suffered by tenants could amount to trauma. Housing officers noted that there could be a general unwillingness for tenants to take up the offer of a PRS tenancy as a means of alleviating their homelessness: *'We have tenants not really wanting to go back'* [HOP-HIH01-02].

Professionals who routinely deal with tenants within the shadow private rented sector should exercise 'professional curiosity'. This is a mode of working that is integral to social work practice and encourages the professional not to take presented information at face value. Elements of professional curiosity include:

- Not dealing with issues in isolation;
- Active observation;
- Triangulating information;
- Willingness to have difficult conversations;
- Understanding past history; and
- Relationship building.

These principles suggest that an officer presented with a property complaint or an attempted illegal eviction takes time to look beyond the presenting issue and consider the nature of the tenant's relationship with the landlord. The Landlord/Tenant Liaison officer interview demonstrated how this worked in practice. The officer had a remit for protecting vulnerable adults in the PRS, which also combined an element of environmental protection work and enforcement. Their role meant that they drove around their patch and spotted where there might be problems: for example, if a property looked to be in disrepair, or there was excess rubbish in the garden, they would knock on the door. The officer, asking supportive questions to gain the trust of the tenant, would then often discover that *'there's a bigger picture'*. This could include elements of landlord abuse, which was common in that area of the city. The examples of extended abuse included in Boxes 2:1 and 2:2 indicated that a level of professional curiosity drove further interventions beyond initial concerns relating to property condition, leading ultimately to enforcement teams involving adult safeguarding colleagues.

It is also necessary to recognise that an experience of abuse can be highly traumatic. 'Trauma-informed' care is becoming integral to support for individuals who are homeless.

Box 4:1 Defining trauma

'An event, series of events, or set of circumstances that is experienced by an individual as physically or emotionally harmful or life threatening and that has lasting adverse effects on the individual's functioning and mental, physical, social, emotional or spiritual wellbeing'.¹⁶

¹⁶ Substance Abuse and Mental Health Administration, quoted by L. McCarthy (2022) *Trauma-informed approaches in homelessness practice: an exploration of practitioner understandings and implementation*, CRESR, 1.

This approach encourages staff dealing with individuals experiencing homelessness to ask 'what has happened to you?' rather than 'what is wrong with you?'.¹⁷ In seeking to place a tenant who has been subject to an extended period of landlord abuse, local authorities should accept that the tenant will be dealing with long-term mental health impacts, distrust of statutory authorities, and fears that their experiences will be repeated.

Homeless tenants who are resistant to being placed in another PRS tenancy would benefit from validation that their reluctance is justified, assurances that the landlord's property passes the required standards and that no issues have arisen in relation to their professional practice, and that ongoing support is available such that any concerns raised by the tenant are given due consideration. Currently, the operation of 'tenancy liaison officers' within local authority homelessness services to support the landlord when tenancies begin to break down. It is suggested here that the local authority's landlord liaison function should include ongoing contact with tenants placed in PRS tenancies, so the officer can be alerted to the development of detrimental landlord behaviours. Having a direct link to a named housing support officer would assure a traumatised tenant that assistance was immediately available.

4.4 Identify effective protection and enforcement tools

Multi-agency approaches

Local authority enforcement officers and housing options teams were asked about other parts of the local authority they worked with routinely. Some reference was made to adult safeguarding teams, although this tended to be with a degree of frustration. One leading officer in an enforcement team indicated that their work now routinely expanded into dealing with the dealing with the increasing number of vulnerable individuals in the PRS:

When I first started, it was simpler to do the job. You were just dealing with houses. The new manager was saying, 'but this is just bricks and mortar, why are getting involved with landlords and tenants?'. But you're not just dealing with the house, you're dealing with issues around the house. Because of cutbacks, there's more people out there with high vulnerability and mental health issues. We're crying out for support from Adult Services and other areas. But capacity is an issue that's thrown back at us so many times [PSH-EFE1].

Another officer noted an instance where they had attended properties where there was an immediate child safeguarding issue, but the social work team simply did not respond to repeated calls for assistance.

There were examples of good practice. In another local authority, where multiple service providers operate within a highly integrated service, private sector housing officers attend Multi-Agency Risk Assessment conferences that discuss high-risk cases of domestic violence and vulnerable children and adult panels. Although no mention was made of landlord abuse issues in this context, it was clear that this level of partnership working offered the opportunity of clear lines for dialogue and co-ordination between enforcement and social work teams.

Some of the tenant experiences discussed in this report indicated levels of vulnerability of the tenant that were sufficiently acute to draw a safeguarding intervention. This happened when the tenant had reached a mental health crisis in terms suicide ideation, or – in one case – actual suicide attempts, or the tenant was demonstrably incapable of taking care of themselves, as in the cases presented in Boxes 2.1 and 2.2. These were clearly cases where referrals had been made to draw in appropriate levels of support for the tenant. However, there appears to be limited prospects for intervention where the tenant has not reached an acute crisis point.

¹⁷ *Ibid.*, 20.

Introducing PRS tenant support officers

Another example of good practice within the case study area was the creation of a tenant support officer. This local authority had made the decision had been made to extend the support that was routinely available to tenants in social housing, reflecting the increasing number of more vulnerable tenants who were now living in the PRS. As mentioned above, this officer had a remit for that encompassed support, environmental protection and enforcement. The officer had a case load of around 20-30 clients in a typical quarter, and caseworked each client from the point at which initial contact was made. The officer often used the prosaic issue of rubbish or property disrepair to engage the tenants, and described their working practices:

once I'm dealing with the bin issues and the waste in the garden, then I talk about the tenancy. Are they having any problems with their home? Do they rent the property? These are the conversations that I have, and that's how I actually build up the relationships and the rapport. Then that's when they put their trust in me and tell me. That's how I pick up majority of my work.[...]

when I start working with a tenant and they tell me that there are problems with the home, they may not have any heating. They may be paying their rent by cash, they may not have the appropriate certificates, or just basic safety things like smoke alarms, carbon monoxide detectors. This is where the enforcement starts [...]

I always have the conversation and say, 'Have you spoken to your landlord about this?' Then that's when some of them will say, 'I'm too scared to say anything.' Then they'll tell you the reasons why they're too frightened to stay with the landlord. It's a big picture. What I tend to do is, when I'm supporting someone, I keep that case from start to finish, so I deal with the enforcement and everything [LTL-ABA01].

The officer worked closely with the enforcement team, and with tenancy relations experts within the homelessness team. The officer had environmental health training and was able to pass on cases where improvement notices might be required, or where there were threats of eviction. The officer was able to support the tenant throughout these processes.

4.5 Legislative interventions

It is crucial for local authorities to develop a more tenant-centred approach in dealings with the shadow PRS. Intervention would be easier if local authorities could draw on appropriate protection and enforcement tools. There are limited legislative options for authorities to use in response to tenant abuse. Housing Acts are mostly focussed on material contraventions such as property conditions. Tenant abuse often reflects a landlord's intention to let property in extremely poor condition. Prosecution may lead to an improvement in conditions within a particular property but would not address the tenant abuse directly. The Protection from Eviction Act (PfEA) 1977 provides some protection of tenants from harassment but only where harassment is intended to force a tenant to surrender their tenancy. Further, the PfEA does not apply to lodgers or other kinds of excluded tenancy.

There is no legislation to support tenants who want to leave situations of abuse, thereby breaking the terms of their tenancy. A tenant choosing to leave would be classified as 'intentionally homeless' and ineligible for local authority homelessness relief.

The Renters' Rights Bill aims to offer improved protection to tenants, but this is predicated on a consumer model that offers frameworks for complaint and mediation that encourage tenants to exercise their rights. This kind of approach fails to acknowledge that some parts of the market do not operate within a legalistic framework, and that tenants may be subject to controlling behaviours that prevent their seeking advice or redress.

This report suggests that other legislative enactments might be valuable in expanding the protections available to tenants who are subject to abuse.

Serious Crime Act 2015

S76 of the Serious Crime Act 2015 legislates against 'controlling or coercive behaviour in an intimate or family relationship'. Guidance on use of the Act offers helpful commentary on the nature of abusive behaviour generally, and can be applied to tenant abuse:

A controlling or coercive behaviour offence does not relate to a single incident – it is an intentional pattern of behaviour which takes place over time, in order for one individual to exert power, control or coercion over another.¹⁸

According to government guidance, controlling and coercive behaviour is defined as an offence when:

- The victim and perpetrator are personally connected at the time the behaviour takes place;
- The behaviour has had a serious effect on the victim;
- The behaviour takes place repeatedly or continuously; and
- The perpetrator must have known that their behaviour would have a serious effect on the victim, or the behaviour must have been such that he or she 'ought to have known' it would have had that effect.¹⁹

Here it is accepted that a residential letting might not be regarded as being a 'personal connection' between the landlord and tenant. However, a letting arrangement does draw both parties into a long-term arrangement that very often rests on multiple personal interactions. One element of landlord abuse is achieving emotional manipulation via those personal interactions. Misunderstanding of a landlords' rights to access a tenant's domestic space creates opportunities for emotional manipulation and threat. Landlords also have access to tenants' personal information, which means that they can contact the tenant at any time.

Box 4:1 reproduces all the behaviours listed in the Government's statutory guidance on controlling and coercive behaviour and is here edited to exclude behaviours that are only relevant to intimate or family relationships (such as controlling reproductive rights, or the threat of placing someone in a care home). There is a substantial degree of overlap between the behaviours in Box 4:1 and the abusive behaviours reported in Chapter 2.

Box 4:1 Behaviours that are within the range of controlling or coercive behaviour, applicable within a letting arrangement

Physical and sexual violence/abuse and violent behaviour

- Physical violence, and threats of physical violence;
- Physical intimidation e.g. blocking doors, clenching or shaking fists, slamming doors, hitting walls, pretending to hit or swing, throwing objects at or around the victim, displaying weapons or harmful objects; and
- Sexual assault, coercion or abuse, and threats of sexual assault.

¹⁸ Home Office (2023) *Controlling or coercive behaviour: statutory guidance framework*, https://assets.publishing.service.gov.uk/media/642d3f9e7de82b001231364d/Controlling_or_Coercive_Behaviour_Statutory_Guidance_-_final.pdf, accessed 29 Oct 2025, 5.

¹⁹ *Ibid.*, 9.

Emotional and psychological abuse

- Abuse relating to faith or beliefs;
- Verbal abuse;
- Constant criticism of the victim's role as a partner, spouse or parent;
- Criticising the victim's choice of friends and associates;
- Intentionally undermining and/or manipulating the victim.

Controlling Behaviours

- Controlling or monitoring the victim's daily activities and behaviour;
- Using digital systems, such as smart devices or social media, to coerce, control, upset and monitor the victim;
- Controlling and monitoring the victim's access to their post;
- Acts of coercion or force to persuade the victim to do something that they are unwilling to do;
- Economic abuse (e.g. coerced debt, controlling spending/bank accounts/investments/mortgages/benefit payments);
- Making and enforcing rules and regulations that the victim is expected to follow and using punishments to make them comply e.g. making accusations or humiliating a person in public or private for deviating from the rules;
- Coercing the victim into carrying out criminal behaviour such as selling drugs or carrying weapons;
- Following the victim and/or appearing unexpectedly,

Restrictive Behaviours

- Withholding and/or destroying the victim's immigration documents, e.g. passports and visas;
- Isolating the victim from family, friends, colleagues and professionals who may be trying to support them, intercepting messages or phone calls.

Threatening Behaviours

- Threats to expose/exposure of sensitive information (e.g. sexual activity, private sexual photos or films, 18 sexual orientation and/or transgender identity), or making false allegations to family members, friends, work colleagues, community or others, including via photos or the internet;
- Making false allegations to statutory agencies (e.g. Police, Children's Services, Jobcentre, Child Maintenance Services);
- Using children to control the victim, e.g. threatening to take the children away, threatening to harm the children;
- Using pets to control or coerce a victim, e.g. harming, or threatening to harm or give away pets;
- Threats to the victim, including to their family, friends and pets, that make them feel afraid;
- Threats to report a victim to immigration enforcement and/or the police, or threaten to remove the victim to their country of origin; and
- Intimidation or threats to go to the police to report alleged offending.²⁰

It might therefore be appropriate to extend the remit of the Serious Crime Act to cover abuse within a landlord/tenant relationship.

²⁰ *Ibid.*, 15ff.

Anti-social Behaviour injunctions

The City of Wolverhampton Council is exploring the use of the Anti-Social Behaviour Crime and Policing Act 2014 to deal with criminal landlord behaviours. This grants powers to seek injunctions against individuals who are likely to engage in anti-social behaviour (ASB). The legislation defines ASB as activities that are

- causing or likely to cause harassment, alarm or distress;
- causing nuisance to a person in relation to occupation of residential premises; or
- capable of causing housing-related nuisance.

The value of this legislation rests in the very broad framing for ASB offences: for example, actions of repeated trespass, interference with utility supply, and threatening behaviours can be captured within this framework. Unlike the Protection from Eviction Act, it does not need to be proven that the behaviours were intended to force the tenant to leave the property. An injunction either prohibits an individual from taking a particular action or requires them to take the action described in the injunction. The decision to issue an injunction rests with a judge, who makes their decision based on the evidence that is produced.²¹ A landlord breaching an injunction can be punished with two years' imprisonment, an unlimited fine or arrest without a warrant.

4.6 Conclusion

Like many other elements of landlord criminality, tenant abuse hides in plain sight. Landlords are not inadvertently or mistakenly exploiting or manipulating tenants: this is a way of working that aims to extract maximum financial benefit from minimal investment, using vulnerable and marginalised tenants who have no other housing options. Local authorities can be complicit in this kind of criminality. Housing options teams often direct tenants to landlords who are known for their poor management practices and lax property standards. Enforcement teams' focus on property conditions means that problematic behaviours tend not to be scrutinised.

There is a need for local authorities to recognise tenant abuse as a type of criminal behaviour, and one that is most often deployed so that tenants will tolerate very poor-quality property. The level of abuse endured by some tenants amounts to trauma, and trauma-informed approaches – which are increasingly deployed within homelessness services – should be extended to support tenants who are precariously housed in the shadow PRS.

Further research is required to frame good practice guidance to support tenants who are subject to abusive exploitation by their landlord. Often these behaviours are normalised by tenants and by the statutory authorities dealing with the tenant. The power and control wheel can be a tool to pinpoint behaviours, and good practice should explore the creation of a suite of possible interventions.

²¹ Local authorities have the right to seek injunctions under the Local Government Act 1972, s222.

Appendix 1: Research methods

This project began in April 2023 and finished in December 2025. The project used Yorkshire and the Humber (Y&H) as a case study region. The fifteen constituent local authorities have varied economic and social demographics, with concentrations of high deprivation and low-demand housing. In 2023/4, Y&H had the highest crime rate of all English regions.²² The local authorities varied in their degree of proactivity in terms of housing enforcement.

All qualitative respondents were sent a work package (WP)-specific information sheet, with consent secured in writing or in some cases verbally. Within the reports, all participants are identified with a unique code. Verbatim quotations are given in italics. All the four principal grey reports published in December 2025 draw on information from each WP.

This project was completed by a team of researchers, with Kit Colliver (York Law School) employed to deliver elements of WP3 and WP4, and Loren Parton (University of Sheffield) delivering elements of WP1, WP2 and WP4. Geoff Page (University of York) and Georgios Antonopoulos (Northumbria University) made substantial contributions to WP1. The research also drew on the expertise of Safer Renting staff Roz Spencer, Ben Reeve-Lewis, Isobel Langdale, David Scully and Joey Carr.

WP1: Criminal landlord behaviour and the policing response

(Lead: Xavier L'Hoiry, University of Sheffield)

WP1 focused on identifying the criminal behaviours that are associated with letting property. WP1 research involved qualitative data collection in the form of interviews. Interviews were analysed descriptively with NVivo 12 and further thematic analysis identified. Ethics approval for this WP was secured from the Department of Sociological Studies Ethics Committee, University of Sheffield.

Qualitative data

Interviews with law enforcement and other practitioners

Across the WP, 49 interviews were carried out with practitioners working in the Y&H region. A combination of purposive and snowball sampling was deployed to recruit participants. Purposive sampling was used to target practitioners with experience of intervening with criminality taking place in the PRS. The research team drew on existing professional networks with police forces in the first phase of participant recruitment. In the second phase of recruitment, snowball sampling was used to ask interview participants to connect the team with additional potential participants. This resulted in 37 interviews carried out with police practitioners across the four forces in Y&H. Of these, 28 were officers/staff working with local forces, seven were Regional Organised Crime Unit officers/staff and two interviewees held national roles. The WP sought to capture a range of police ranks (from Police Constable through to Detective Chief Inspector) and roles

²² <https://www.statista.com/statistics/866788/crime-rate-england-and-wales-by-region>, accessed 23 Nov 2025.

(frontline and management). Moreover, a further five interviews were carried out with heads of community safety partnerships in Y&H and seven interviews with representatives from local authorities in Y&H with a specific focus on criminality (e.g.: Serious and Organised Crime Coordinators). Interviews were conducted between July 2023 and March 2024.

Interviews with landlords

The WP also sought to gain insights into why landlords engage in criminality. A purposive sampling strategy was used to target landlords who were aware they had committed illegal or potentially illegal acts. Recruiting such participants proved to be very challenging and time consuming. The research team initially approached known contacts in law enforcement and local authorities for potential leads to participants. This yielded one participant. The research team also reviewed media reports of landlord prosecutions and contacted over 20 of these landlords via social media to invite them to interview. This was not successful and several of these individuals 'blocked' the research team online. The most successful recruitment method proved to be an open invitation posted on social media groups dedicated to landlords as well as a specialist landlord website in the UK. These invitations yielded 24 responses, and once potential participants contacted the project team, pre-interview discussions were held to ensure that participants were fully aware the study was focused on landlords' illegal behaviours. In total, 17 interviews were carried out as seven potential participants did not respond following initial exchange of emails/messages. One interview was subsequently discounted as it was clear that the participant had not broken the law.

All but two interviews across the WP were audio recorded and transcripts were produced. For the two non-audio recorded interviews, detailed notes were made. Transcripts and notes were anonymised as per the ethical protocol of the WP, with further review to identify information that was then redacted to ensure anonymity.

WP2: Examining and learning from the most effective solutions

(Lead: Julie Rugg, University of York)

Dealing with criminal behaviour in the private rented sector is the responsibility of organisations including the police, environmental health professionals, trading standards officers and tenancy relations officers. This work package explored local authority perspectives on criminal landlord behaviour and sought to disseminate examples of best practice. All the interviews were transcribed, and analysis was undertaken using a thematic grid. Ethical approval for this WP was secured from the Social Policy and Social Work Ethics Committee at the University of York.

Qualitative data

This work package used qualitative data collection across all fifteen local authorities in Y&H, using existing contacts to secure a contact for each local authority. This resulted in interviews with 30 PSH professionals, sixteen homelessness team members, four trading standards officers (at local and regional levels) and three professionals from other agencies. These interviews were completed in stages, from the summer of 2023 to the winter of 2024. One further formal interview was conducted with a PSH professional working in an

authority outside the region, to secure further information on innovation in its operational practice.

An attempt was made to complete formal interviews with other statutory agencies operating at national and regional levels including the Department for Work and Pensions, the Gangmaster Labour Abuse Authority, HMRC and the Immigration Agency but none of these agencies supplied a respondent.

RIAMS workshops

The WP used the RIAMS network which supports professionals working in environmental health to disseminate best practice via online workshops.²³ These workshops were recorded and made available via a dedicated section within the RIAMS website. Thirteen recordings were made available on subjects including local authority strategies for tackling criminal landlords; information sharing between trading standards and private housing environmental health teams; presenting evidence at residential property tribunals; use of banning orders; use of interim management orders; cuckooing; safeguarding and brothel closures; rent-to-rent scams; defending against CPN appeals; effective approaches to prosecution for illegal eviction; the Cannabis Grow Aware scheme; tackling modern-day slavery; and recovering rent and fines from criminal landlords including use of the Proceeds of Crime Act 2002 (POCA).

WP3: Housing justice

(Lead: Caroline Hunter, York Law School)

WP3 sought to explore how do local authorities decide to take legal action under their housing powers against criminal landlords and work the courts in those cases. The research involved a range of primarily qualitative data with a smaller element of quantitative data. The interviews for the case study authorities were analysed descriptively with NVivo 12 and further thematic analysis identified. All other interviews were analysed using thematic analysis.

Ethics approval for this WP was secured from the Economics, Law, Management, Politics and Sociology (ELMPS) Ethics Committee, University of York. All respondents were sent a WP information sheet, and consent was secured.

Qualitative data

Case study authorities - case tracking and interviews

For the research the Project followed four local authority private sector housing services within the Y&H region. The teams of three of the authorities (FGF, HIH, BCB) were primarily involved in housing standards work. The fourth team (MNM) was focused on illegal eviction and harassment. Activities included analysing current or recent case files of housing offences on the upper end of severity (n=29)²⁴, conducting longitudinal practice-level interviews with case leads over an 18-month period, and strategic-level interviews

²³ <https://riams.org/>, accessed 23 Nov 2025.

²⁴ Local authorities were requested to choose cases on these criteria: the seriousness of behaviour by the landlord (most serious examples of criminality); the stage of action by the authority; whether legal action was ongoing; police involvement and/or other non-housing offences being involved.

with heads of service (n=4) and local authority lawyers (n=3). The analysis identified commonalities and differences in enforcement strategy and practice and the factors that informed these choices.

Interviews with criminal lawyers and staff in other local authorities

In addition to the lawyers for the case study authorities, the Project team interviewed four criminal lawyers involved in prosecuting cases in other local authorities (Criminal lawyers 1 - 4). The interviewees were purposefully identified either from contacts at Safer Renting or from newspaper reports of illegal eviction prosecutions. One of the interviews included not only the lawyer at the local authority but also two PSH officers involved in the prosecutions undertaken by that authority. The interviews explored the progress for illegal eviction and harassment cases, any obstacles to justice and reform of the Protection from Eviction Act 1977.

Interviews civil lawyers and staff at advice organisations

Eleven interviews were undertaken with civil lawyers (Civil Lawyers 1 - 11). Again, the interviewees were purposefully identified from: knowledge of the research team; contacts made through a presentation made a research team member for the Doughty Street Chambers' All Day Housing Conference 2025: 'Rogue Landlords'; and contacting solicitors with legal aid housing contracts in the Y&H region. Three were barristers (one employed in a tenant organisation), all in London. Three were solicitors in private practice firms that have legal aid contracts for housing cases; two were in London and one in Birmingham. The remaining worked in Law Centres or NGOs with legal aid contracts for housing cases either as solicitors or as housing advisors. One was out of London. None of the interviewees worked north of Birmingham. No responses were received from the solicitors in the Y&H region. The interviews asked about the interviewees experience of clients who had been illegally evicted and/or harassed, and taking cases to the county court of the tribunal for rent repayment orders. In addition, three interviews were undertaken with advice organisations (Advice 1-3). A focus group also took place with four Safer Renting staff. These interviews were focused on the advice and support given to clients and working with other organisations.

Observation of three cases at Sheffield Magistrates' Court

One the research team observed a hearing day for local authority cases at Sheffield Magistrates' Court in June 2025. Three illegal eviction cases were heard. All were adjourned for trial or sentencing at a later date.

Focus groups with judges

The research team sought to interview both magistrates and judges of the First Tier Tribunal (Residential Property) (the FTT). In order to interview judges, it is necessary to seek permission from the Judicial Office.²⁵ An application was made in November 2024. Permission to interview judges from the FTT was given in June 2025. Two focus groups and an individual interview with judges from the London and Northern region of the FTT took place in August 2025. The interviews explored the judges' experience of civil penalty

²⁵ See <https://www.judiciary.uk/guidance-and-resources/judicial-participation-in-research-projects/>, accessed 18 Nov 2025.

appeals, rent repayment and banning orders and what factors informed their decision-making. Permission to interview magistrates was given on 13 August 2025, but it was not possible, within the timeframe of the project, to recruit any magistrates who had experience of housing offences.

Quantitative data

Data from FOI request to London boroughs

The research team were sent the responses to an FOI request to all London Boroughs for information on illegal eviction and harassment made by Gus Silverman, solicitor at Deighton Pierce Glynn in August 2024. The responses to the requests had limited quantitative data, but the qualitative data has been included in the analysis.

Banning order decisions

Decisions on banning orders are published on the FTT website.²⁶ All the decisions published up to March 2024 (n=40) were analysed to explore what contributed to a successful banning order application. Note that this figure includes two appeal cases seen by the Upper Tribunal and one variation of a decision.

Ministry of Justice prosecution data

An application for data on housing offences (Protection from Eviction Act 1977 and Housing Act 2004) prosecuted between 2011-2023, was made to the MoJ. The data was released 21 May 2024.²⁷ Analysis was conducted using the data flat files for each year, which capture defendant cases at principal offence level. Where cases involve more than one offence, this dataset records information for the offence with the most serious disposal. As such, the data may underestimate the overall number of offences and less serious disposals (e.g. disposal orders and victim surcharges). However, as housing offence cases are prosecuted by the local authority, a significant discrepancy between actual and reported case figures is unlikely.

Data analysis involved identification of housing offence types using Home Office (HO) and Criminal Justice System (CJS) offence codes, associated outcomes including findings and disposal, and geographical and longitudinal trends.

Disclaimer: This work was produced using administrative data accessed through the ONS Secure Research Service. The use of the data in this work does not imply the endorsement of the ONS data owners (e.g., HM Courts and Tribunals Service and the MoJ) in relation to the interpretation or analysis. This work uses research datasets which may not exactly reproduce Accredited Official Statistics aggregates. Accredited Official Statistics follow consistent statistical conventions over time and cannot be compared to Data First linked datasets.

Local authority civil penalty notice data

All local authorities in Y&H were asked for civil penalty notice (CPN) data: Data on offence, frequency and size of CPNs, and recovery rates. Data was collected from eight local authorities from the fifteen authorities in the region.

²⁶ <https://www.gov.uk/residential-property-tribunal-decisions>, accessed 18 Nov 2025.

²⁷ ONS SRS Metadata Catalogue, dataset, Ministry of Justice Data First Magistrates Court Iteration 2 - England and Wales, <https://doi.org/10.57906/1yrt-zd35>.

Data from RRO applications and CPN appeals in the FTT

Toward the end of the project, data created by Marks out of Tenancy (MOOT) using text-mining to scrape all the published decisions on the category 'Housing Act 2004 and Housing and Planning Act 2016' was sent to the Research team. A very small part of the data, concerning CPN cases and Rent Repayment Orders, was analysed.

Data from legal aid

Quarterly statistics for legal aid are published publicly.²⁸ Using that data, the number of legal aid applications for harassment and wrongful eviction over time were identified.

WP4: Tenant experience

(Lead: Lisa O'Malley, University of York)

Developmental work

This work package aimed to explore tenant experience of landlord-perpetrated crime. In part, ESRC funding was used to employ a support worker at the Bradford housing charity Hope Housing, which works with tenants excluded from the mainstream housing market. Early development was conducted with tenants and support workers. This work indicated that tenants did not always recognise that they had lived in the 'private rented sector': their experience included often extremely precarious living arrangements where there was still an expectation that they should pay rent. This research collaboration ended as a consequence of internal management change at the charity.

Qualitative interviews and case studies

The WP then began work with Safer Renting, to pursue joint objectives for this WP and WP5. Safer Renting offers tenants relations expertise to London boroughs and works to secure beneficial outcomes for tenants who have been victimised by criminal landlords. Many tenants in their caseload will have experienced actual or attempted illegal eviction. Formal interviews with Safer Renting clients were conducted by Safer Renting caseworkers, using a topic guide agreed by the team and which focused on the tenants' rental experience. In total, fourteen depth interviews were completed and transcribed. These interviews were analysed using a thematic grid. Case workers were themselves interviewed to secure a further 33 case summaries. This method ensured that these clients remained anonymous. All these clients had agreed that their cases could be used for further research.

Attempts were made to contact other charities and agencies who support tenants who are likely to be marginalised in the private rented sector, with very limited success.

WP5: Illegal eviction

(Lead: Julie Rugg, University of York)

This WP, which was not anticipated in the initial objectives for the project, was completed in collaboration with Safer Renting and staff working across the other WPs. This element of

²⁸ <https://www.gov.uk/government/statistics/legal-aid-statistics-january-to-march-2025-data-files>

the project aimed to assess the degree to which the Protection from Eviction Act 1977 could be regarded as fit for purpose. This WP included multiple elements.

Qualitative data

Safer Renting interviews

Interviews were conducted with fourteen Safer Renting clients who had been subjected to illegal eviction or attempted illegal eviction. The interviews were completed by Safer Renting staff. The interviews focused on the rental experience of the tenant from the start of the tenancy, including reasons why the tenant moved into the property, experiences through the course of the tenancy and events leading up to the attempted or actual illegal eviction.

Safer Renting cases

Safer Renting casework staff were asked to select four or five cases to discuss. All had been referred to Safer Renting between December 2023 and April 2025. The case workers were asked for basic demographic information about the client, the circumstances in which the case came to the attention of Safer Renting, and a summary of the problems with the landlord as reported by tenant including a narrative of the attempted or actual illegal eviction.

WP2 interviews

All the respondents who were interviewed in WP2 were asked about the incidence of illegal eviction and about the local authority responses in tackling this problem. Interviews with housing options staff were strongly focused on procedures in response to illegal eviction.

WP3 qualitative data

A number of the elements from WP3 qualitative data was used for this WP. This included:
The case study of local authority MNM;
Interviews with criminal lawyers and staff in other local authorities;
Interviews civil lawyers and staff at advice organisations;
Observation of three cases at Sheffield Magistrates' Court.

Quantitative data

WP3 quantitative data

This WP also drew on the following quantitative data from WP3:
MoJ data, reporting on the incidence of illegal eviction, sentencing and outcomes;
Data from FOI request to London boroughs;
Data from RRO applications and CPN appeals in the FTT;
Data from legal aid.

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