

# HOUSING AND COMMUNITY SERVICE SCRUTINY PANEL - RENTERS' RIGHTS ACT BRIEFING PAPER

Community Connections

## Introduction and Background

The Renters' Rights Act 2025 represents the most significant reform of the private rented sector (PRS) in a generation, aiming to strengthen protections for tenants while placing clearer, more enforceable obligations on landlords. The Act developed from the earlier Renters' (Reform) Bill gained Royal Assent on 22 October 2025 and was enacted on 27 October 2025. It establishes a new statutory framework focused on security of tenure, transparency, improved housing conditions, and enhanced local authority enforcement powers.

For Plymouth City Council, the Act brings substantial new duties, reporting requirements, and expectations of early, consistent enforcement. These duties commence from **1 May 2026**, with phased implementation running throughout 2026 and beyond.

- **Phase 1** – Tenancy Reform and new enforcement actions (**01 May 2026**)
- **Phase 2** – Private Rented Sector Database and Ombudsman (**Late 2026**)
- **Phase 3** – Introduction of Awaab's Law and New Decent Home Standard (**TBC – pending consultation**)

This paper is an update to the paper provided to the Housing and Community Services Scrutiny Panel on 22 October 2025 which can be found [here](#).

## Renters' Rights Act 2025 - Update Overview

### Implications

The Act places significant new responsibilities on local authorities, resulting in a substantial increase in demand for resources dedicated to regulating and managing the Private Rented Sector (PRS). Based on early assessments, there is concern that the level of staffing required to meet statutory duties exceeds current capacity. The resource requirements to manage the PRS were highlighted in the Phase 1 progress table within previous paper.

To manage the PRS, particularly Phases 1 and 2, the minimum number of officers required has been assessed as 3. This is beyond existing service budgets and funding envelopes. There remains uncertainty surrounding additional New Burdens Funding and the proportion PCC will receive from the Private Rented Sector Database. A further review of the expansion of the workforce and management of the PRS will therefore occur when further clarity is provided regarding future funding.

### New Burdens Funding

New Burdens Funding is being made available, based upon the size of the Private Rented Sector within Plymouth and in November 2025 the grant determination for 2025/2026 was confirmed.

PCC has been allocated **£98,286.96** for 2025/26. This has been utilised to offset against costs already incurred in preparing for the new statutory duties in line with the conditions of the grant. Further New Burdens Funding for 2026/27 has yet to be confirmed.

### Action Plan

Community Connections Housing Standards team are leading the way in preparing for the Act and have developed an action plan for the readiness and implementation of the Act.

The action plan outlines the key workstreams, tasks, and progress updates required to ensure Plymouth City Council is fully prepared for the phased implementation of the Act, as detailed in the table below. However, completion dates have not been set as we await further guidance in relation to future phases.

Workstream	Task	Update
<b>IT Assessment</b>	Audit existing IT systems for compatibility, compliance gaps and mandatory reporting requirements (of the 65 required reporting fields current assessments show only 6 are recorded in a reportable way currently).	Ongoing – System readiness is being managed throughout the Delta reporting pilot.
	Identify system updates, changes or replacements needed.	Initial findings are that systems can be updated to meet phase I of reporting. Consideration to an updated CRM is required for full roll out of statutory reporting.
<b>Resource Planning &amp; Budgeting</b>	Define wider resource requirements. Gold standard has been set at 1 x Private Rented Sector Officer per 800 relevant properties. This equates to 34.4 officers, or 850% growth on the current operational resources focused on the management of the Private Rented Sector. We do not believe the current PCC budget, short term new burdens, and increased enforcement will see our resourcing figure achieve anything close to this level.	<b>2025/2026</b> Recruited 1 x SCCO to take the enforcement lead around the Act. Start date confirmed as 02/02/2026.  <b>2026 and beyond</b> – Awaiting confirmation of further New burdens Funding and income from Civil Penalties & PRS Database.
	Consider new burdens allocation and Civil Penalty income, against resource requirements, training and new IT systems.	2025-26 new burdens utilised to offset against work already done in preparing for new duties under the Act. Further income will be considered for further requirements and work to maintain new duties.
<b>Training</b>	Develop role-specific training programs to address regulatory requirements.	Complete.
	Use a mix of e-learning, specific external training, and workshops, whilst working with neighbouring authorities to ensure regional consistency and shared costs.	Ongoing – PCC have access to training resources and materials through Operation Jigsaw, which is being disseminated across the teams. Further training will be required when different aspects of the Act are phased in.
	Utilise existing external platforms to provide updates and seek feedback such as Staff Room, South West	Comms to go out over a few months prior to Phase I.

<b>Communication &amp; Engagement</b>	Landlords Association, Facebook, X, to keep people informed.	Further comms will be published close to the time of Phases 2 & 3.
	Create a webpage on PCC website to outline the Act and the new duties for landlords with links to guidance.	Complete.
	Soliciting 2-way communication.	Review Firmstep forms & update or create new forms where necessary.
	Design an A5 flyer to be sent out to landlords across the city. Flyer to have a QR & link to webpage.	A review of how to distribute flyers to landlords across the city is being held and we are seeking to put leaflets in places not typically used to target landlords.
	Strengthen relations with tenant voice groups to understand the changes in the Private Rented Sector.	This will be developed with partners in line with emerging guidance and programme delivery.
	Work with MHCLG to ensure national communications are shared appropriately and tailored to local approach where required.	Ongoing talks are being held with MHCLG to align with national comms that can be tailored locally.
<b>New and Updated Policy &amp; Process Rollout</b>	Adapt, update or where required create new policies and processes aligned to the legislative gap analysis.	The Civil Penalty policy and Electrical Safety policy reviews have been paused due to guidance around the RRA being released. They need to be reviewed again to consider guidance. JIGSAW are developing a working group to develop a national version - we will look at working on our own in the interim but may consider what is drafted via JIGSAW.
	Create clear Standard Operating Procedures (SOPs) reflecting legislative updates.	New processes and procedures are being developed.
	Implement dashboards for real-time tracking and reporting.	Dashboards and real-time tracking will be implemented following the agreed Delta reporting.
	Build in policy and process review periods to ensure that intention has aligned with implementation, and to consider outcomes such as tribunal findings.	Regular reviews will be implemented
<b>Process Change Implementation</b>	Pilot new processes in controlled environments with teams prior to full rollout.	Ongoing – Taking part in pilots.
	Automate compliance checks and reporting where possible, utilising new technologies, AI and Power BI.	Ongoing – Initial discussion has been held with Performance team about embedding PowerBI into Flare.
<b>Performance Monitoring &amp; Compliance Audits</b>	Redefine Key Performance Indicators (KPIs) to align to new Delta requirements.	Delta data reporting points are currently being refined. As such, KPI realignment will not take place until the final reporting points are confirmed.
	Work with Devon Audit Partnership to complete compliance reviews.	Early engagement complete.
	Build in reviews to the service plan to ensure continual development.	Ongoing.

**Progress to Date****Legislative Change Taskforce**

A Legislative Change Taskforce has been established, consisting of members from Housing Standards, Housing Solutions and Legal teams. The Taskforce has begun developing Standard Operating Procedures (SOPs) and processes for the cross-departmental work required to establish a strong, consistent, cross departmental approach. This will ensure that Plymouth City Council remains legally compliant with its responsibilities under the Act. Regular reviews of SOPs and processes will be undertaken to ensure effectiveness.

**Recruitment**

Housing Standards have successfully recruited 1x Senior Community Connections Officer who will initially focus on the enforcement against landlords who are in breach of Phase 1 of the Act's implementation.

**Trading Standards**

PCC and Trading Standards are in the final process of agreeing the work that Trading Standards will lead on under the Act and will have updated agreements and processes in place prior to the introduction of Phase 1. The proposal to Trading Standards is that they are best placed to lead on enforcement of breaches under the Renters' Rights Act related to amended Tenants' Fees Act (2019) (TFA). This is predominantly pre-tenancy breaches.

**Training**

Training needs have been identified across internal stakeholder groups, and a comprehensive training programme has been created. This will ensure all staff understand their new responsibilities and are able to carry out their duties effectively ahead of Phase 1 implementation.

As secondary legislation is introduced and Phases 2 and 3 come into effect, further training requirements will emerge. The training programme will therefore continue to be reviewed and updated to reflect these changes and maintain compliance.

**Income**

Income received from enforcement action will be ringfenced to the service along with further income derived from a portion of the Database registration fees from the Database provider. Income will be utilised to enable PCC to carry out their duties under the Act.

**Local, Regional and National Engagement**

Area	Update
<b>Local</b>	<p>Community Connections continue to work with South West Landlords Association and Plymouth Homes 4 Lets (PH4L) to ensure we are maximising our engagement with the leading accreditation programme group in the region. Information is being shared throughout their members and non-members in respect of the Act, what it means for landlords and to advertise training opportunities to ensure landlords are compliant.</p> <p>PCC hosted a Housing Breakfast Expo in November 2025 engaging with landlords across the PRS to educate them on their new duties under the Act, how to prevent and tackle damp and mould and prevent homes from becoming cold.</p> <p>Further communications with landlords and tenants will be published on PCC's social media accounts in due course.</p>

<b>Regional</b>	Plymouth and Torbay have agreed to co-chair the regional Operational Jigsaw meetings. The span is from Cornwall to the Forest of Dean. Community Connections are also a member of the Devon Private Rented Sector Forum bringing together key individuals from regions teams responsible for the PRS.
<b>National</b>	Community Connections are actively engaged with the working groups hosted by MHCLG which focus on the development of the PRS Database Data Collection Refinement and Rent Repayment Orders (RROs) processes.

### **Key Risks & Mitigation Strategies**

The current Key risk is that we have a significant level of change pending in the management of the private rented sector however we have no defined budget or timeline to work towards, other than parts 1 and 4 are imminent.

<b>Risk</b>	<b>Actions to Address Risk</b>
<b>Income uncertainty regarding New Burdens Funding and PRS Database</b>	Continual requests have been made to understand New Burdens Funding for 2026/2027 and what proportion of the PRS Database costs PCC will receive.
<b>Lack of clarity around implementation timeline</b>	Continual requests to chairs of pilot schemes and to MHCLG around the introduction of statutory reporting, PRS database, PRS Ombudsman, Decent Home Standard and introduction of Awaab's Law.
Landlord resistance to change	Strong communication, stakeholder engagement, and leadership support.
Income	Continual review, produce a Civil Penalty Calculator, providing legal capacity where required to ensure fines are recovered, ensure landlords sign up to the PRS Database promptly.
Ineffective Training Programme	Early identification of training requirements, development of role specific training programme, ongoing support and training for staff to enable them to carry out their duties to the best of their ability and ensure PCC remain legally compliant.