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Consultation Document – summary of responses

Information, periods and fees required for an application for registration and an application for a licence under Part 1 of the Housing (Wales) Act 2014 – Regulation of Private Rented Housing

Date of issue: July 2015

Summary of Consultation Responses to the Regulation of Private Rented Housing (Information, Periods and Fees for Registration and Licensing) (Wales) Regulations 2015 (“Information Regulations”)

Introduction

The National Assembly for Wales passed the Housing (Wales) Bill in July 2014 and Royal Assent was granted in September 2014. Part 1 of the Housing (Wales) Act 2014 (“the Act”) covers the regulation of private rented housing and introduces a mandatory registration scheme for landlords and a requirement for landlords and agents to be licenced where they undertake letting and property management activities.

A consultation exercise was undertaken to seek views on the policy behind the Information Regulations. The Regulations will be made under sections 15(1), (1)(b), (4), 16(1)(e), 19(1)(b) and (d), 21(4), 23(1)(b), 46 and 142(2) of the Act and will set out the information, periods and fees required for an application for registration and an application for a licence under Part 1 of the Act. The consultation exercise contained questions relating to:

- the time period for determining an application for registration;
- information to be included in an application for registration;
- changes to be notified to the licensing authority in relation to registration;
- the time period for determining a licensing application;
- information to be included in an application for a licence;
- changes to be notified to the licensing authority in relation to licensing;
- fees for registration and licensing; and
- the declaration to be included in an application for registration or a licence.

Following the passing of the Regulation of Private Rented Housing (Designation of Licensing Authority) (Wales) Order 2015 (“Designation Order”) by the National Assembly on 24 March, Cardiff Council was designated as the Licensing Authority for the whole of Wales. Only the responses received to the consultation on the Information Regulations are summarised in this document. A complete consultation summary document will be published on the Welsh Government website at a later date.

Consultation Process

A six week public consultation was launched on 27 March 2015 and was open for responses until 07 May 2015. A total of 8 questions were included in the consultation document relating to the information, periods and fees for applications for registration and licensing under Part 1 of the Act.

The consultation document was published on the Welsh Government website and stakeholders were contacted directly and invited to take part in the consultation.

A total of 44 responses were received which broke down into:

- 10 Personal / Unknown
- 10 Local Authorities
- 9 Letting and Management agents
- 7 Trade Associations
- 4 Landlords
- 2 Third Sector Organisations
- 1 Registered Social Landlord
- 1 Public Body

8 responses received were from outside Wales, although all of these respondents had interests inside Wales either as national professional bodies, trade associations or landlords.

This document provides a summary of the responses received to the eight questions relating to the Information Regulations. It cannot include every comment, however, it tries to capture recurring themes and issues.

Legislative Background

Registration

Period for determining an application for registration

Section 15 of the Act relates to registration by a licensing authority. Under section 15(1) of the Act Welsh Ministers can prescribe the time period within which an application for registration by a landlord is to be determined by the licensing authority. The proposal is it will be set at 4 weeks.

Information to be included in an application for registration

Under section 15(1)(b) of the Act Welsh Ministers can prescribe the information which is required in an application for registration from a landlord. This information will include:

- the name of the landlord;
- details of any other names by which the landlord has been known;
- the correspondence address of the landlord;
- if the landlord is a body corporate, the address of the landlord's registered or principal office;
- a contact telephone number for the landlord, if available;
- a contact e-mail address for the landlord, if available;
- the date of birth of the landlord, if applicable;
- the address of each rental property in the licensing authority's area for which the landlord is the landlord;
- the name and date of birth of any joint landlord in relation to any rental property declared by the landlord and which one of the joint landlords is to be designated as the lead landlord for the purposes of registration;
- the name and licence number, if applicable, of any person appointed by the landlord to carry out lettings work or property management work on behalf of the landlord and the address of each rental property to which the appointment relates; and
- a relevant registration number if the landlord is a company or charity.

In addition the Act allows, under section 15(1)(c), for the authority to ask for further information as part of a landlord registration.

Changes to be notified to the licensing authority

Section 16(1) of the Act places a duty on a landlord who is registered to notify the licensing authority of the following changes:

- any change in the name under which the landlord is registered;
- the appointment of a person to carry out lettings work or property management work on behalf of the landlord in respect of the rental property;
- that a person a landlord has previously appointed to carry out letting work or property management work has ceased to do so;
- any assignment of the landlord's interest in the rental property;

There is also provision in section 16(1)(e) of the Housing (Wales) Act 2014 for the Welsh Ministers to prescribe further changes which must be notified in writing to the licensing authority. It is proposed the following changes should be prescribed:

- correspondence address;
- contact telephone number, if provided;
- e-mail address, if provided; and
- any other contact information provided in the application.

It should be noted a landlord has 28 days to notify the licensing authority of any change, failure to do so is an offence (see section 16(2) – (4) of the Act).

Licensing

Period for determination of a licensing application

Under section 21(4) of the Housing (Wales) Act 2014 Welsh Ministers can prescribe the time period in which a licence application must be determined by the licensing authority. The proposal is it will be set at 8 weeks.

Information to be included in an application for a licence

Section 19 of the Act relates to licence application requirements.

Under section 19(1)(b) of the Housing (Wales) Act 2014 Welsh Ministers can prescribe the information which is required in an application for a licence. This will include:

- the name of the applicant;
- details of any other names by which the applicant has been known;
- the correspondence address of the applicant;
- if the applicant is a body corporate, the address of the applicant's registered or principal office;
- if the applicant is carrying out lettings work and property management work on behalf of a landlord in the course of business, the address of any premises in the area of the licensing authority used for that purpose;
- a contact telephone number for the applicant, if available;
- a contact e-mail address for the applicant, if available;
- the date of birth of the applicant, if applicable;
- whether the applicant is applying -
 - (i) in respect of a rental property which the applicant is the landlord for; or
 - (ii) as a person acting on behalf of the landlord;
- details of any licences, voluntary accreditation, or registration held, refused or revoked in connection with any rental properties in any other part of the UK by the proposed licence holder;
- a declaration of –
 - (i) any convictions of the applicant relating to offences involving the matters listed in section 20(3)(a) of the Act;
 - (ii) any court of tribunal judgement against the applicant under the Equality Act 2010; and
 - (iii) any conviction of the applicant relating to offences in connection with any matter relating to the provisions referred to

in section 20(3)(c) of the Act and any finding of a court or tribunal that the applicant has contravened any of those provisions;

- where the application is a charity or company, the relevant registration number; and
- the name and date of birth of any connected person¹, if applicable, and how they have met, or will meet, the training requirements specified in regulations made under section 19(2)(b) of the Act.

In addition the Act allows, under section 19(1)(c), for the authority to ask for further information as part of a licence application.

Changes to be notified to licensing authority

Section 23 of the Act provides a licence holder must notify the licensing authority in writing of the following changes:

- any change in the name under which the licence holder is licensed.

There is also provision in section 23(1)(b) of the Act for the Welsh Ministers to prescribe further information which has to be updated by licence holders if their circumstances change. The proposed changes include:

- correspondence address;
- contact telephone number, if provided;
- e-mail address, if provided;
- any other contact information provided in the application;
- any material change that would constitute evidence of the matters referred to in section 20(3) to (5) (fit and proper person requirement); and
- any changes in identity of any connected person.

It should be noted a licence holder has 28 days to notify the licensing authority of any change, failure to do so is an offence (see section 23(2) – (4) of the Act).

Responses to the individual questions set out in the consultation

Period for determining an application for registration

The intention is the licensing authority would have up to 4 weeks to process an application for registration, which will allow a degree of flexibility should there be a large number of applications when the scheme goes live. In practice, and certainly after the registration scheme is more established, applications will be processed more quickly. Applicants will also be able to apply on-line. This will also speed up the process.

¹ “Connected person” means a person doing things under a contract of service or apprenticeship with an applicant for a licence who, as part of their role, undertakes the type of letting and property tasks the Act covers.

Do you agree that 4 weeks is an appropriate timescale for processing an application for registration?

Of the 44 responses received:

30 (68%) answered Yes

13 (30%) answered No

1 (2%) did not answer the question

There was broad agreement the 4 week time period was sufficient to determine an application for registration. Comments included:

- four weeks is an appropriate and proportionate timescale for processing an application for registration;
- we support this proposal as we believe that having a target of timescale will help to ensure timely action; and
- whereas four weeks appears to be a reasonable timescale, it is important that four weeks does not become the default timescale and should represent the absolute cut off point by which an application should be processed.

Respondents who did not agree with the 4 week timescale either did not agree with the need for registration at all, or thought the timescale was either too short or too long. Comments included:

- too long. The period, any period is meaningless;
- I do not agree that the process should be done at all. It is yet another burden on the honest private landlord;
- the private rented sector is fast moving you need to shorten the process to 10 working days; and
- no in the first instance I think that closer to 8 weeks is more appropriate. After the first year, perhaps 4 weeks is appropriate.

Welsh Government Response

As the significant majority of respondents agreed with the proposed timescale it is our intention the Information Regulations will specify a 4 week time period for determining an application for registration. This will allow the licensing authority flexibility in processing applications.

Information to be included in an application for registration

Do you consider that the proposed information that will be required is adequate?

Of the 44 responses received:

29 (65%) answered Yes

14 (33%) answered No

1 (2%) did not answer the question

The majority of respondents agreed the proposed information to be included in an application for registration was acceptable and appropriate. Comments included:

- we believe that the information required is appropriate. We believe it could include additional information such as the person responsible for repairs and gas servicing;
- the information held on such a register should be kept to a minimum necessary to perform the statutory function;
- it is not necessary for the Welsh Government to prescribe that a vast amount of information is required; and
- in principle we do consider the proposed information that will be required is adequate. However, we do believe there will be some practical issues in relation to maintaining and enforcing such a comprehensive database.

In general, there were few comments made by those who agreed with the proposals. Respondents who answered no to the proposed information required thought it was too invasive or felt more information should be required. Comments included:

- would like description of property e.g. type of property, number of storeys, maximum number of tenants;
- in order to support the policy intent of improving practice within the private rented sector (PRS), we want to see the information requirement to go further and include details about the condition of each of the rental properties registered;
- we are concerned that the Act allows, under section 15(1)(c), for the authority to ask for further information as part of landlord registration. This introduces a degree of uncertainty for landlords and agents, in terms of the extent of the registration task;
- a unique identifier, such as a National Insurance Number is sufficient; and
- for a body corporate, the person making the application should state their position in the body corporate.

Welsh Government Response

Because the majority of respondents agreed with the proposed information which will accompany an application for registration it is our intention to proceed with the Information Regulations as proposed. The licensing authority will also have the ability to require additional information where it is appropriate.

Changes to be notified to the licensing authority

Do you consider that the changes proposed in the regulations which have to be notified to the licensing authority are adequate?

Of the 44 responses received:

30 (68%) answered Yes

13 (30%) answered No

1 (2%) did not answer the question

A clear majority of respondents supported the proposed changes in circumstances and personal information which should be reported to the licensing authority. Comments included:

- we support this proposal and believe that the 28 days deadline will be important in ensuring that changes are notified in a timely manner;
- the information held on such a register should be kept to the minimum necessary to perform the statutory function;
- again, importantly the minimum essential changes only need to be notified; and
- as long as it is data protected.

In general, there were few comments made by those who agreed with the proposals. Respondents who disagreed with the proposed changes to be notified to the licensing authority either thought this would be too cumbersome or more detail was required: Comments included:

- if the tenant is informed of a change of address that should be sufficient;
- the administrative burden of notifying of changes of agents or managers is too high;
- it is another form of control and is not welcome by the honest 99% of the population;
- we would re-emphasise here that the registration requirements (including the change notification requirements) introduce significant administrative responsibilities for landlords; and
- the four proposed additions seem sensible in principle. However, how will such additions be enforced in practice?

Welsh Government Response

As over two-thirds of respondents agreed with the proposals relating to changes which should be notified to the licensing authority it is our intention to proceed with this policy element of landlord registration. The changes to be notified have been kept to a minimum so as not to make the system overly bureaucratic.

Period for determination of a licensing application

It is the intention to allow the licensing authority 8 weeks to process an application for licensing.

Do you think that 8 weeks is a reasonable timescale for determining a licensing application?

Of the 44 responses received:

24 (54%) answered Yes

19(44%) answered No

1 (2%) did not answer the question

A majority of respondents supported the proposal to allow the licensing authority 8 weeks to determine an application for licensing. The main concern was the timescale was too long. However, in practice, and as the registration and licensing scheme beds in, the timescale is highly likely to be much less than 8 weeks. Setting the determination at 8 weeks will allow the licensing authority flexibility should demand on the system be high at any given point in time. All the respondents who answered yes to the question chose not to comment. However, comments from other respondents included:

- the whole scheme should be scrapped as it is thought out by little minds who have nothing to do but justify themselves;
- if a landlord cannot operate without first having approval then 8 weeks is excessive as it may harm their business;
- this is far too long and will be detrimental to the private rented market;
- this is an unnecessarily long time to allow the authorities to determine the outcome of an application;
- eight weeks is an excessive timescale within which to make a business wait for authorisation;
- as registration should not take place;
- a licensing application could be completed in a day if people and systems were more effective and efficient;
- eight weeks is far too long a period to process licensing applications from either landlords choosing to let property directly, or for agents letting on behalf of landlords;
- reduce to four weeks; and
- the period for determining a licensing application should be as short as possible, given that the lack of a licence will prevent a new landlord from letting a property.

Welsh Government Response

There seemed to be some confusion about what was being proposed. The eight week timescale is set to allow the licensing authority flexibility when determining licensing applications and it is a maximum time period. As long as landlords or agents have made an application they will be able to continue with their business activities including receipt of rent etc.

Well over half of the respondents agreed with the proposal to allow the licensing authority 8 weeks to determine an application for a licence therefore it is our intention to proceed with the Information Regulations as proposed. This is a maximum timeframe and will afford the licensing authority the flexibility it will need.

Information for an application for a licence

An application for a licence will have to contain specified information prescribed in the Information Regulations.

Do you consider that the information that will be required is adequate?

Of the 44 responses received:
34 (77%) answered Yes

8 (19%) answered No
2 (5%) did not answer the question

There was very strong support for the proposed information which will be required to accompany an application for licensing. The vast majority of respondents who agreed with the proposal chose not to comment. Responses included:

- yes. However, the fifth bullet point should be amended to reflect the fact an applicant may carry out lettings work only or lettings and property management work;
- we believe that the information outlined in the proposals is adequate. We believe that it would also be useful to include information on who is responsible for gas safety work;
- more than enough;
- beyond adequate. Excessive;
- the information required is excessive; and
- we believe that it is the role of the licensing authority to help ensure that the properties provided by the landlord are in good condition and properly maintained in order to drive up standards and practice within the PRS.

Respondents who disagreed with the proposed information which will be required to accompany an application for a licence either wanted more information to be included or questioned the need for licensing. Comments included:

- there is an issue where multi-agencies are used by a property owner to market their properties. Do they need to specify all?
- the less information the better. The specified information is excessive;
- details of any licences etc. refused or revoked should relate to rental properties in Wales as the rest of the UK;
- what happens if the applicant is a landlord AND a person who acts on behalf of a landlord – are two licences required?? and
- should not be done at all.

Welsh Government Response

More than two-thirds of the respondents fully agreed with the proposed information which will be required to accompany an application for licensing. It is therefore our intention to proceed with this policy intention to ensure the information specified is included in an application for a licence.

Changes to be notified to the licensing authority

If a licensed person's circumstances change e.g. they move to a new correspondence address, there will be a duty to inform the licensing authority of their change in circumstances.

Do you agree the changes proposed in the Regulations which will have to be notified to the licensing authority are reasonable?

Of the 44 responses received:

29 (66%) answered Yes

12 (27%) answered No

3 (7%) did not answer the question

The majority of respondents supported the proposals relating to the changes which should be notified to the licensing authority. Although most of those who agreed with the proposals chose not to comment, points which were made included:

- yes. However, should agents also be required to notify the licensing authority when a property comes onto or leaves their books (as well as landlords informing of an appointment / change of agent)?
- once again draconian penalties of criminal sanction on landlords, and no penalty whatsoever on the fee collecting councils; and
- we would expect that 'any material change' in relation to evidence regarding the 'fit and proper person requirement' is tightly defined, and does, as proposed, only apply exclusively to matters outlined in sections 20(3) to (5) of the Act.

Respondents who disagreed with the proposals either thought the requirements were excessive or questioned the need for licensing and Part 1 of the Act. Comments included:

- the notifiable changes are excessive and the penalties for failing to do so severe;
- multi-agency involvement for marketing activities. This would be a nightmare to "Police" and keep updated;
- no, they are completely unreasonable and you should learn to trust the 99% of the population;
- clarification required as to whether as well as changes in identity of any connected person, should notification be required in any connected person is no longer connected or if there is any additional Connected person;
- registration should not take place;
- we would argue these proposals generate such a significant administrative burden for both agents and the licensing authority as well as a massive potential for inadvertent non-compliance that they are not practically implementable; and
- jobs for the boys again!!!!

Welsh Government Response

As a significant number of respondents support the proposals relating to changes which should be notified to the licensing authority it is our intention to introduce the Information Regulations as proposed. We believe these requirements are both appropriate and proportionate.

Fees for registration and licensing

It is the intention the licensing authority will be able to set a fees policy for registration and licensing fees. Before charging any fee, the licensing authority must prepare and publish a fees policy and will only be able to charge such fees in line with their fees policy. The licensing authority may fix different fees for different cases or descriptions of cases and these must be clearly shown in their policy.

Do you agree that the licensing authority should set and publish a fees policy for registration and licensing fees?

Of the 44 Responses received:

31 (71%) answered Yes

12 (27%) answered No

1 (2%) did not answer the question

Over two-thirds of respondents agreed the licensing authority should set and publish a fees policy. Comments on the proposals included:

- yes. However, the fees should take into account different situations, such as size of agency etc. For example, we manage 35 properties whereas a National chain of Estate Agents manage far more and this should be reflected in the fees structure;
- yes as long as the fees are reasonable and not punitive;
- yes. However, clarification would be useful as to how often / under what circumstances the fee may be revised. Also would there be a lead-in period between publication of the fee policy and its implementation?
- we believe that this process should be transparent and that fee levels should be consulted on with relevant stakeholders. This will help to ensure that the fee levels are appropriate;
- yes. However, we do not think we should be double charged to have two licenses, as this will deter investment from compliant landlords, whereas the bad landlords this is designed to stop, will carry on without applying, because they know that the LA has not the resources to find them (or else they already would have); and
- any fees policy must reflect the legal right of the licensing authority to recover fees.

Respondents who disagreed with the proposals either did not want any fees to be set or thought they should be set centrally. Comments included:

- any charges are unwarranted;
- this legislation is bureaucratic and expensive, the landlords and agents will invariably pay for this;
- absolutely not. This exercise is a complete waste of time. It is simply a nice little earner and popular with many voters. A chance to bash private landlords;
- no. I believe the LA should set and publish a fees policy only after consultation with landlords in the area;
- fees should only ever be set at a minimum level. Private landlords are already obliged to incur a range of fees and expenses prior to letting property, and this should be considered in setting fees levels;
- it is an absolute must that the fee structure is set nationally. It is unreasonable and inequitable that authorities are able to set their own fees;
- the Welsh Assembly should prescribe the fees by statutory instrument;

- we believe that fee setting should be undertaken centrally. Demonstration that the scheme is self-financing and not making a profit for the public sector, will be a crucial aspect of scheme monitoring;
- no I do not agree. There should be no fees for services required by taxpayers;
- I do not think that landlords should have to pay any fees at all. There is more than enough legislation which is expensive and totally a waste of time and money burdening the landlord; and
- As currently outlines in the consultation document, the proposal appears as though the Welsh Government is giving Cardiff Council complete autonomy and authority to do as they wish.

There seems to be some misunderstanding here as in effect the fees will be on a National basis as we have single licensing authority for the whole of Wales who will be publishing the fees policy.

Welsh Government Response

The policy intention to have only one licensing authority for all of Wales has already been put in place by the Designation Order. The fees will in effect be the same for the whole of Wales. The fees that can be charged, and for what purposes, are already governed by other pieces of legislation, case law and general administrative law, therefore the Council will not have autonomy and authority to do as they wish.

As an overwhelming number of respondents supported the proposals for the licensing authority to set fees and publish a fees policy we intend to go ahead with this policy intention. Giving the licensing authority flexibility for setting fees means it will be easier to change them rather than if they were set by Statutory Instrument.

Declaration to be included in applications for registration or a licence

An application for registration or a licence will have to be accompanied by a specific declaration.

Do you consider that the proposed declaration is adequate?

Of the 44 responses received:

36 (82%) answered Yes

7 (16%) answered No

1 (2%) did not answer the question

A very high number of respondents agreed with the wording and the need for a declaration. Most did not comment. Other observations included:

- we believe that the declaration should be provided in multiple languages beyond English and Welsh to reflect the diverse nature of communities in Wales;

- BE careful here. Many business people have made mistakes in their lives, and yet they are having to act like priests. The rental sector is a business, just like a car business with losses and profits and hard work. Don't take a holier than thou view, please;
- the draft of the proposed declaration is appropriate;
- a declaration to an unscrupulous landlord isn't worth the paper it's written on;
- the declaration is excessive. After "2014 that is false", the declaration should stop; and
- we consider the proposed declaration is adequate and the wording appropriate.

The few who disagreed with the proposed declaration either did not want a declaration at all or wanted it to be re-worded. Comments included:

- registration should not take place;
- why have any. Let us have a declaration from the CEO of each council first as to their guarantee of the proper use of monies collected and ensure they are ring-fenced to this whole misconceived project and form a new income stream;
- a more simple declaration is adequate and you should trust people to be honest as the majority of people are;
- should not have to be done at all. Do Ministers and public officials have to do this? Their actions do not prove that they are worthy to hold office very often; and
- no this does not read well and should be re-written.

Welsh Government Response

The declaration reflects section 39 of the Act which provides it is an offence to provide false or misleading information in connection with Part 1 of the Act. The declaration is a way of drawing applicants' attention to the consequences of this provision.

Because a very high number of respondents supported both the need for and the wording of the declaration our view is the proposal to include it in applications for registration and licensing should go ahead. A similar declaration has already been used for licence applications under the Housing Act 2004 with no negative effect. We see no reason to deviate from the original policy intention.

Conclusion

The Welsh Government welcomes the responses received to the consultation. The consultation period has ensured key stakeholders have been given the opportunity to engage with the proposed Regulation of Private Rented Housing (Information, Periods and Fees for Registration and Licensing) (Wales) Regulations 2015 and has allowed for discussion to take place about the new legislation and its implementation.

We have taken into account all of the responses received and have drafted the Information Regulations based on the responses. The Welsh Government was pleased to see the vast majority of respondents supported its proposals.

Full list of Consultation respondents

Letting and Management Agents		
1	Swift Relocations	1 King St, Carmarthen, SA31 1BA
2	Evergreen Homes	78 york Street, WH1 1DP
3	AA Properties Wales	13 Graigwen, Morganstown, CF15 8LH
4	LSL	LSL, 1-2 Northenhay Place, Exeter, Devon, EX4 3YF
5	Darcy Ptoperties Ltd	Gwen Medd Farm, Llangoedmor, SA43 2LP
6	Rees Richards & Partners	Druslyn House, De la Beche St, Swansea, SA1 3HH
7	Anonymous	
8	Anonymous	
9	Anonymous	
Local Authorities		
10	Conwy CBC	Civic Office, Colwyn Bay, LL29 8AR
11	Bridgend CBC	Civic Offices, Angel Street, Bridgend, CF31 4WB
12	Cardiff Council	Wilcox House, Dunleavy Drive, Cardiff, CF11 0BA
13	Private Sector Housing Expert Panel.	c/o Rhondda Cynon Taf CBC, Public Health and Protection Dept, Ty Elai, Williamstown, Tonypany, CF40 1NY
14	Rhondda Cynon Taf CBC	Public Health and Protection Dept, Ty Elai, Williamstown, Tonypany, CF40 1NY
15	Conwy CBC	41 Conwy Road, Colwyn Bay, Conwy, LL29 7AA
16	City & County of Swansea Council	Housing & Public Health, Directorate of Place, City and County of Swansea, Oystermouth Road, Swansea, SA1 3SN
17	Wrexham CBC	Housing Services, Ruthin Road, Wrexham, LL13 7TU
18	Conwy CBC	Civic Offices, Abergele Rd, Colwyn Bay, LL29 8AR
19	Anonymous	
Trade Associations		
20	Country Landlords Association	Ty Cymru, Presteigne Enterprise Park, Presteigne, Powys, LD8 2UF
21	Federation of Small Businesses Wales	1 Cleeve House, Lambourne Crescent, Llanishen, Cardiff, CF14 5GP
22	Residential Landlords Association	1 St Martin's Row, Albany Road, Cardiff, CF24 3RP
23	Central Association of Agricultural Valuers	Market Chambers, 35 Market Place, Coleford, Gloucestershire GL16 8AA
24	Guild of Residential Landlords	Suite 3, 13 Station Parade, Harrogate, HG1 1UF
25	National Approved Letting Scheme (NALS)	Eagle Tower, Montpellier Drive, Cheltenham, GL50 1TA
26	Association of Residential Letting Agents (ARLA)	Arbon House, 6 Tournament Court, Edgehill Drive, Warwick, Warwickshire, CV34 6LG
Third Sector		
27	Citizens Advice Bureau	Trafalgar House, 5 Fitzalan Place, Cardiff
28	Wales Co-operative Centre	Wales Co-operative Centre, Y Borth, 13 Beddau Way, Caerphilly, CF83 2AX
Public Bodies		
29	National Trust	Ysbyty Estate Office, Dinas, Betws y Coed, Gwynedd, LL24 0HF
Registered Social Landlords		
30	Monmouthshire Housing Association	Nant y Pia House, Mamhilad Technology Park, Mamhilad, Monmouthshire, NP4 0JJ

Landlords and Individuals		
31	Andrew Grew	4 the Orchard, Broadlands, Bridgend, CF31 5ER
32	David Solomons	25 Marlborough Drive, Ilford, Essex, IG5 0JN
33	John Daley	32 Ash Road, Princes, Risborough, HP27 0BQ
34	Julie Kirby	julie@kirby.co
35	Rob Williams	4 Cefn Close, Croesceiliog, Cwmbran, NP44 2NE
36	John Cooper	2 Court View, Langstone, Newport, NP18 2NN
37	Wynne Jones	Min yr Afon, Abercych, Boncath, Pembrokeshire, SA37 0EX
38	Anonymous	
39	Anonymous	
40	Anonymous	
41	Anonymous	
42	Anonymous	
43	Anonymous	
44	Anonymous	