

Department for Communities – consultation on amendments to The Landlord Registration Scheme

Regulations (NI) 2014

Response from Propertymark

June 2026

Background

1. Propertymark is the UK’s leading professional body of property agents, with over 19,000 members representing over 12,500 branches. We are member-led with a Board which is made up of practicing agents, and we work closely with our members to set professional standards through regulation, accredited and recognised qualifications, an industry-leading training programme and mandatory Continuing Professional Development.¹

Consultation – overview

2. The Landlord Registration Scheme was introduced in Northern Ireland in 2014 where it was administrated by the Department for Communities (DfC).² Since 1 March 2025, the responsibility for administering the scheme was transferred to Lisburn and Castlereagh City Council who would manage and host the Scheme on behalf of all local authorities in Northern Ireland. As part of the transfer, the scope of the Scheme has been expanded upon, with proposals for more requirements for landlords to submit information about their property. This represents a shift to make the database a more effective enforcement tool. In order for these changes to be made, the Landlord Registration Scheme Regulations (Northern Ireland) 2014 would need to be amended. This consultation seeks views on the specific amendments.

Propertymark response – summary

3. Propertymark welcomes the opportunity to respond to the consultation on The Landlord Registration Scheme Regulations (NI) 2014. We approve of the use of the Landlord Register to enhance enforcement to create a level playing field across Northern Ireland, where landlords and agents who fail to meet their regulatory requirements face penalties, which improves compliance within the sector. A focus group of nearly 30 Propertymark members also concluded that there

¹ <https://www.propertymark.co.uk/>

² <https://www.legislation.gov.uk/nisr/2014/9/contents>

was significant support for the changes although some concerns were raised about the duplication of information. Overall, however, Propertymark has very few concerns over the introduction of the amended regulations, but we will expand on concerns when relevant.

Consultation Questions – Propertymark response

Question 1: Do you agree with the proposal to expand the information requested for landlord registration as outlined in the consultation document?

4. Yes, we agree with the proposal to expand the information requested for landlord registration as outlined in the consultation document. This will help to set the Landlord Registration Scheme as a more active enforcement tool. To support letting agents who fully manage properties on behalf of landlords, we call for additional clarity that letting agents will be able to upload documents themselves rather than landlords. This must be explicitly made clear within the Registration Scheme to avoid confusion as to who is responsible for uploading information, with letting agents clearly responsible where they fully manage property. This avoids situations where landlords use a letting agent to manage property on their behalf, only to find out later that they'd be responsible for uploading documents to the Scheme, even if the documents are held and organised by the letting agent.

Question 2: Do you agree with the proposal that information on the following requirements should be provided as part of the registration process?

- **Fitness for human habitation**
 - **Smoke, heat and carbon monoxide alarms**
 - **Electrical safety checks**
 - **Gas safety certificates**
 - **Energy performance certificates**
5. When shared with our members, the vast majority agreed with the proposal that information on all five requirements should be provided as part of the registration process. However, there was only a single piece of information that received unanimous approval, with Gas Safety certificates receiving the highest percentage of agreement (100%) and Fitness for human habitation requirements receiving the lowest (83%). Considering the level of support, we are confident in our position that the Scheme should require all landlords or agents to provide all five pieces of

information. Where agents disagreed with the need to provide information was due to how they often provide a pack containing this information to all potential tenants who express interest in the property. While there is some concern about duplication, we would recommend that the process of providing information should be fully embedded into the Scheme. Once the information sharing aspect of the Scheme has been set up, landlords and agents should be required to send links to the information held by the Scheme rather than being expected to provide additional copies. This would avoid duplication.

Question 3: Do you agree with the proposal to share information held on the Landlord Register with the Health and Safety Executive Northern Ireland to assist with gas safety enforcement in private rented properties?

6. Yes, we agree with proposals to share information held on the Landlord Register with the Health and Safety Executive Northern Ireland to assist with gas safety enforcement in private rented properties. This was the stance taken by 71% of our members who we surveyed. The proposed change will be essential to ensure that the Register can be effectively used by enforcement bodies to take action against agents and landlords who may be renting out properties that don't meet minimum legal standards. Increasing the capacity for the Scheme to take action against landlords and agents who do not meet minimum standards increases the value it provides to those who are compliant and raises standards across the sector.

7. Additionally, Propertymark is a long-time and active supporter of Gas Safe Week, reinforcing our commitment to safety standards within the property industry.³ We actively encourage our member agents to share advice with tenants and landlords about annual checks and alarms as well as encouraging contacts to visit GasSafeRegister.co.uk to find and verify engineers. We also support members through a variety of communications and guidance resources to support compliance and awareness.

Question 4: Do you agree with the proposal to share information (this will not include personal information that would allow an individual to be identified) held on the Landlord Register with the Department for Communities for research and statistical purposes, to assist with the formulation and development of policy and legislation relating to the private rented sector?

³ <https://www.propertymark.co.uk/resource/propertymark-supports-gas-safety-week-2025.html>

8. Out of all the questions, this was the most contentious with 29% of surveyed members disagreeing with the proposal and 61% agreeing with it. While a considerable majority agreed with it, the relatively high amount of disagreement should be cause for concern. Compared with other proposals, the benefits from this are not necessarily clear. While needing to upload data and having that more effectively enforced brings value to agents and landlords by levelling the playing field and raising standards across the sector, at this stage it's not clear what kind of legislation will be introduced from the data collected. As a matter of importance, Property agents want to see resources put towards targeting and taking action against non-compliant agents. For clarity, as an organisation, Propertymark supports this proposal as it'll enable decisions made by the DfC to reflect more up to date information about the private rented sector. However, the DfC should be aware that this is a somewhat contentious proposal. Importantly, agents and landlords will need greater reassurances that their data will not be collected in a way that enables the DfC to identify them personally.

Question 5: Do you agree with the proposal to amend Schedule 2 to bring this in line with the current practice of allowing a public online search by address function on the Landlord Registration Scheme website?

9. Propertymark agents largely supported this proposal, with only 3.5% disagreeing with it. While some members have raised concerns about the public being able to identify which specific properties a landlord and agent owns, it has been reassuring to see that changes have been made to the public search function that will only confirm if the property, letting agent and landlord have been registered on the Scheme. We do ask for additional reassurances that this will not change, as letting agents are concerned about the public having a list of the name of all their landlords and addresses. This would make it easier for competitors to directly contact their landlords to encourage them to switch agents.

Question 6: Do you have any other comments on the proposed changes to the Landlord Registration Scheme Regulations?

10. We have no further comments to make at this time.